

Thames Tideway Tunnel
Thames Water Utilities Limited



Application for Development Consent

Application Reference Number: WWO10001

Thames Water's Response to Local Impact Report from London Borough of Lambeth

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**Thames
Tideway Tunnel**



Creating a cleaner, healthier River Thames

1 Response to London Borough of Lambeth Local Impact Report

1.1 Introduction

- 1.1.1 This section responds to the points raised in the [Local Impact Report](#) (LIR) submitted by the London Borough of Lambeth to the Examining Authority for the 4 November 2013 deadline. The table below is arranged by topic and sets out the comment from the LIR on the left with Thames Water’s response on the right.
- 1.1.2 We have carefully reviewed the LIR and consider that many of the matters raised have already been taken into account in the *Initial Statement of Common Ground (SoCG)* with the London Borough of Lambeth and the draft Section 106 Heads of Terms (Doc ref: APP25, [Thames Water Utilities Limited Part 3 of 3](#)) submitted to the Examining Authority on 4 November 2013. This response provides a commentary on those key issues which we consider may be helpful to the Examining Authority.
- 1.1.3 The further iterations of the SoCG to be submitted to the Examining Authority later in the examination process will address any outstanding matters raised in the LIR and, through ongoing discussions with the London Borough of Lambeth, will note any outstanding areas of disagreement between the parties.

Table 1.1 Response to LIR

Ref	LIR para. ref	London Borough of Lambeth comment	Our response
General			
1.	12.22 and 12.23	<i>“The inclusion of a lockable gate preventing public access to the southern shaft structure would be contrary to the aims of Policy 39 of the saved UDP and would arise in significant harm to public’s enjoyment of the river Thames environment. The Local Authority considers that the surface of the permanent interception structure level with the Thames Path adjacent to Vauxhall Cross should be</i>	The restriction on public access has been included at the specific request of the occupants of Vauxhall Cross. Design Principle ALBEF.06 would enable access to the interception structure to be provided should the occupants of Vauxhall Cross withdraw their objection. This is a matter of disagreement noted in

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		<p><i>fully integrated into the public realm and therefore accessible to pedestrians at all times.</i></p> <p><i>“The Local Planning Authority respectfully requests that the deciding Authority insists that the lockable is removed and that the southern shaft structure is fully integrated into the public realm.”</i></p>	the SoCG.
2.	12.24	<p><i>“During the construction period appropriately signed pedestrian arrangements for the diversion of the Thames Path including provision for people with disabilities would be required. The diversion should be minimised and access returned to the riverside as soon as is possible. The temporary provision of access points and modifications to existing footpaths would involve the removal of existing boundary enclosures. However given the temporary nature of the works and that the boundary would re-instated after completion this is considered acceptable.”</i></p>	<p>Approval for the proposed temporary diversion route of the Thames Path is sought through the Access Plan (DCO-PP-15X-ALBEF-170005), which is for approval in Schedule 2, Part 3, of the Draft DCO Compare (Doc ref: 9.20.02, p. 66).</p> <p>Signage for the diversion will be secured through Requirement PW 11.</p>
Biodiversity and open space			
3.	12.31	<p><i>“The scheme, both during and after construction, may have some effects on water flow and turbulence, and this could result in ‘scouring’ of the river bed and any existing banks of sand and shingle, which are important habitats for many invertebrates, fish and birds in the River Thames. A well-considered approach to ecological modelling and mitigation measures by Thames Water can help address this issue. This inclusion of stepped terraces and native planting is to be welcomed and would be maintained through the requirements.”</i></p>	<p>The Code of Construction Practice (CoCP) (Doc ref: 9.21.03), which is secured through Requirement PW 6, states in para. 11.5.8 that the Environment Agency shall be consulted on method statements for reinstatement of the foreshore. Further negotiations are currently in progress with the Environment Agency with respect to securing how approval would be sought for these matters.</p> <p>The Environment Agency is the appropriate body for these matters and we believe that this consultation would ensure that appropriate mitigation is implemented.</p>

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Transport			
4.	12.36	<i>“The LA expects that the maximum amount of waste and spoil material is transferred away from the site by river.”</i>	We consider that river transport has been extended where practicable and cost-effective. This is an area of disagreement noted in the SoCG.
5.	12.37	<i>“Additionally Transport Officers have requested that wheel washing of construction vehicles be considered for dust suppression.”</i>	Wheel-washing, although not specifically mentioned in the CoCP, is implied in para. 7.2.1, which requires the contractor to follow the measures in the best practice guidance, The control of dust and emissions from construction and demolition , published by the GLA and London Councils in November 2006. In particular, we would draw attention to the Section. 6.3 measures for low risk sites (which will apply to all sites).
Access			
6.	12.41	<i>“In respect of the proposed construction access options the Local Authority would like to make it clear that Option A (utilise Lack’s Dock and existing vehicle cross over to Albert Embankment) is preferred rather than Option B (new access between Camelford House and Tintagel House and associated vehicle cross over to Albert Embankment). The work site adjacent to Vauxhall Cross would have access and egress during low tide only, this method of construction and access would allow uninterrupted access for Duck Tours and other necessary access to the Thames via Lack’s Dock. Furthermore this approach eliminates the likely detrimental effect on Albert Embankment Gardens, the listed Embankment wall and reduces the likely adverse effects on nearby residential neighbour amenity notably with respect to properties at Peninsula Heights. To reiterate the LPA would object to option B.”</i>	We note the council’s submission but have no preference for either option, which will be determined by the Secretary of State. This is a matter of disagreement noted in the SoCG.

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