

**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 Lewisham

Doc Ref: **APP30.12**

Folder **150**  
2 December 2013

**DCO-DT-APP-ZZZZZ-301200**

**Thames  
Tideway Tunnel**



Creating a cleaner, healthier River Thames

# 1 Response to London Borough of Lewisham 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 Lewisham (LB Lewisham) to the Examining Authority for the 4 November 2013 deadline.
- 1.1.2 The response is split into the following sections: Section 1.2 addresses matters in respect of the DCO Requirements and design principles; Section 1.3 addresses matters in respect of the *Code of Construction Practice (CoCP)*; Section 1.4 deals with the Section 106 Heads of Terms Agreement and other legal agreements; and Section 1.5 addresses site-specific matters in respect of the draft proposals at Earl Pumping Station, Deptford Church Street and Greenwich Pumping Station. Sections 1.3 and 1.5 contain tables that set out the comments from the LIR on the left and Thames Water's response on the right. Sections 1.2 and 1.4 describe the matters subject to ongoing discussions with LB Lewisham.
- 1.1.3 Our case for the use of Deptford Church Street, Earl Pumping Station and Greenwich Pumping Station is set out comprehensively in the application for development consent and in our responses to the first written questions. This response therefore does not address every matter raised in the LIR and does not extensively repeat material already submitted to the Examining Authority (ExA). However, we have responded where our case or assessments are challenged.
- 1.1.4 The signed *Statement of Common Ground* and draft Section 106 obligations are to be submitted on 13 January 2014. These documents will address the matters raised in the LIR and through ongoing discussions with LB Lewisham, noting any outstanding matters between the parties.

## 1.2 Draft DCO Requirements

- 1.2.1 LB Lewisham has set out proposed revisions to the submitted DCO Requirements and suggested new Requirements. We propose to issue a further updated version of the revised *Draft DCO* (Doc ref: 9.20) including Requirements to the ExA following the DCO Hearings in late November.
- 1.2.2 The [\*Environmental Statement\*](#) (Doc ref: 6.2.23, Vol 23 Deptford Church Street) acknowledges that several of the likely construction-related effects arising from the Deptford Church Street site would be both significant and adverse. In some cases, LB Lewisham considers that the likely effects will be greater and more damaging than identified. The *Environmental Statement* assessment findings are based on clearly set-out assessment methodologies, which were consulted on. The *Environmental Statement* was

preceded by the *Preliminary environmental information report* and a scoping report, as well as extensive public consultation and followed by Section 48 publicity. If the Council considers the effects to be different to those we have reported in the *Environmental Statement*, it would be helpful to understand which environmental topics the Council considers relevant and the basis of the differences.

- 1.2.3 LB Lewisham considers that a site-specific Requirement relating to the submission of a site-specific archaeological written scheme of investigation is necessary to ensure that archaeology is appropriately protected and managed. This is covered already by Requirement DEPCS 11 in the [Draft DCO](#) (Doc ref: 9.20.02) submitted to the Examining Authority on 23 September 2013.

## 1.3 Code of Construction Practice

**Table 1.1 Response to LIR comments regarding the *Code of Construction Practice***

Ref	LIR para. ref	Issue	Our response
<b>Code of Construction Practice</b>			
1.	9.2.4	<i>“The Council’s view is that Part A of the CoCP is not satisfactory and the site specific Part B documents are insufficiently detailed and precise. In combination they do not provide the level of environmental protection that is appropriate, or an appropriate level of guidance regarding the development of a construction environmental management plan.”</i>	The CoCP has been developed with the local authorities, including input from the Environmental Health Officers, over a period of three years. The <i>Statement of Common Ground</i> sets out all the various discussions with LB Lewisham on the CoCP. Since the re-issue of the <a href="#">CoCP</a> Part A and Bs (Doc refs: 9.21 and 9.22) in September 2013, we have continued to refine the documents in response to comments from our engagement with stakeholders. We are currently considering all feedback received on our CoCP including that provided in the written representations and LIRs submitted for 4 November 2013 deadline. We propose to issue a further updated version of our CoCPs to the Examining Authority following the DCO Hearings in late November.
2.	9.2.13	<i>“There is no mention in Part A of the CoCP of specific procedures or challenges appropriate to slurry handling. “This is a major oversight given the proximity of more</i>	The CoCP Part A sets out the general measures for control and mitigation. The measures to manage and prevent pollution by use of diaphragm wall and tunnel construction slurries are detailed in the

## Response to London Borough of Lewisham Local Impact Report

Ref	LIR para. ref	Issue	Our response
		<i>than one tunnelling drive site to the Thames and its tributaries (e.g. Deptford Creek). The only mention of 'slurry' in any of the CoCP Part B plans is in the Chambers Wharf Part B document, and that is in relation to the control of plant noise rather than the management of risks to the water environment."</i>	CoCP (Section 8). This includes the control of pollution to surface water and ground water, as well as protection of water courses and incident planning, control and response. The CoCP requires a water management plan for each site as part of the construction environmental management plans, which are for approval by the Employer (as defined in the CoCP) in consultation with the Environment Agency and local authorities, and compliance with the agency's relevant pollution prevention guidance documents (Section 8.1). The contractor is also required to produce a pollution incident plan (Section 4) and a site waste management plan (Section 10).
3.	9.4.1	<i>"GPS tracking and clear labelling for every vehicle and a programme is needed for self enforcement, which should be tied to a fine system."</i>	CoCP Part A (Section 5) sets out a number of control measures on lorry routing and access including submission and approval of a traffic management plan to the local authority. These control measures are secured by Requirement PW6 and also Requirements DEPTF 6 and 7.
4.	9.4.2	<i>"The construction environmental management plan should be for Local Authority approval with issues agreed prior to it being distributed to contractors."</i>	Further information regarding the construction environmental management plan can be found in our response to first written question 6.75.
5.	9.4.6	<i>"Parking and traffic complaint hotline and performance standards for dealing with complaints and a "penalty system" for breaches of Travel Plan, to result in penalty payments to be paid into a Residents, Schools and Businesses Traffic Impact Fund."</i>	CoCP Part A (para. 3.1.4) states: <i>"The Employer will maintain a telephone helpline service during the programme construction period to handle enquiries and concerns from the general public. It will also act as a first point of contact for information in the case of any emergency. All calls will be logged, together with a record of the responses and action taken. Appropriate contacts and response times will be the subject of a detailed procedure to be agreed prior to the commencement of construction. Potentially affected occupiers will be notified of the helpline number and it will be widely advertised."</i>

## Response to London Borough of Lewisham Local Impact Report

Ref	LIR para. ref	Issue	Our response
			Monitoring of the mode split of worker travel to site as part of the site-specific Travel Plans will ensure that appropriate measures are put in place to meet targets. However, a penalty system is not in place for breaches of the Travel Plan.
6.	8.1.13 Earl Pumping Station	<i>“LB Lewisham and LB Southwark Councils are concerned that there will be a loss of amenity during the excavation of the contaminated material on site and the extent of the impact has not been fully assessed.”</i>	The measures to manage contaminated material are set out in the CoCP Part A and secured through Requirement EARPS3, which is for approval by the local planning authority.  The implementation of the control measures in the CoCP will help to reduce effects on amenity by controlling impacts from dust, air quality, odour, noise and contamination.
7.	8.1.15	<i>“The Environmental Statement<sup>1</sup> contains mitigation measures to deal with the potential problems from the site. However it is not clear how these effective material management procedures and environmental monitoring will be approved by Environmental Agency and the relevant Local Authorities.”</i>	The draft <a href="#">Mitigation Route Map</a> (Doc ref: 9.07) provides further detail regarding how mitigation is secured. Our response to first written question 6.76 sets out how each of the plans required to be submitted pursuant to the CoCP would be prepared and the role of the relevant authorities in that process.
8.	8.1.32 Earl Pumping Station	<i>“To avoid adverse effects on the public realm, the boundary treatment is particularly important in this location. High quality replacement fencing should be installed along the western edge of the existing Earl Pumping Station site and to continue around the new shaft structure, with details to be approved by the Council.”</i>	The landscaping plan for Earl Pumping Station in the application is illustrative; specific reference is made on this plan to new fencing. The design principles are for approval and principle EARPS.5 states that the shaft enclosure shall provide visual interest when reviewed from the surrounding streetscape and from above.  We welcome the opportunity to develop landscaping plans in due course with local stakeholders and for details to be approved by LB Lewisham.
9.	8.1.50 Earl Pumping Station	<i>“Whilst the Environmental Statement indicates that vibration levels would not reach a level which could cause impacts on residents’ amenity, it notes that specific ground condition encountered would no tbe</i>	We provided further information in our responses to the first written questions. Some of these responses address the use of low noise/vibration piling techniques, as follows:  a. Questions 11.23 and 11.24 set out how we will ensure low

Response to London Borough of Lewisham Local Impact Report

Ref	LIR para. ref	Issue	Our response
		<p><i>known until piling is underway. It may therefore not be possible to use low impact vibration methods. This is a significant concern for residential amenity in both LB Lewisham and LB Southwark and, from the information available, it is possible to determine whether or not adverse impacts would result from other methods of vibration. This concern is extenuated by the lack of any robust measures within the Draft DCO, CoCP, requirements and s106 as proposed in the application to ensure that the contractor will utilise low vibration piling methods unless it is absolutely not possible. If it should be not possible to use these methods, there is then a serious risk of further significant impacts upon the surrounding area for residents. Furthermore, the Thames Tunnel compensation programme is not sufficiently robust to offset the significant impacts.”</i></p>	<p>noise/vibration techniques are used where technically feasible and how this is secured in the <i>Draft DCO</i>.</p> <p>b. Question 11.25 sets out the mitigation options in cases where low noise/vibration techniques are not feasible and adverse effects are predicted or identified.</p> <p>With regards to piling at Earl Pumping Station, further analysis of the ground conditions identified that where driven piling is required, and for the depths that piles would be driven to, low impact vibration techniques could be used.</p> <p>The measures set out in <i>CoCP</i> are secured by project-wide Requirement PW6.</p>
10.	8.1.62 Earl Pumping Station	<p><i>“Considering that cyclists are likely to represent a majority of peak time road users on Lower Road and Evelyn Street by the time of construction, interaction between lorries and cycles will be frequent, especially during peak hours. It is therefore recommended that HGV movements be restricted to off peak hours.”</i></p>	<p>The <i>CoCP</i> Part A (Section 5.2.1) on lorry management details the project commitments with respect to lorry safety, including specific requirements for protection for cyclists. This includes membership of Fleet Operators Recognition scheme, driver training and physical protection measures on vehicles. The measures in <i>CoCP</i> Part A are secured by Requirement PW6 in the <i>Draft DCO</i>.</p> <p>As part of the preparation of the traffic management plan, the contractor would review any need for restrictions of HGV movements during peak hours.</p> <p>We are working with Transport for London as part of the Construction Logistics Cycling Safety working group on improving vulnerable road users’ safety.</p>

Ref	LIR para. ref	Issue	Our response
11.	8.2.62-63 Deptford Church Street	<p><i>“In August 2012 the Council telephoned each of the businesses to understand better how they used Crossfield Street and what the anticipated effects of the proposed works would have on the operation of their businesses.</i></p> <p><i>“Cumulatively the businesses estimated upward of 25 cars, 20 vans and 15 lorries visiting per day. Each business has specific access requirements and said it was crucial to their on-going operations that access and parking was maintained.</i></p> <p><i>“Some businesses are visited by large, articulated lorries, parking for up to half a day, other businesses deal with large fragile items that cannot be easily moved or carried for long distances. All businesses receive frequent deliveries to their premises and these vehicles use Crossfield Street as a set down area while they pick up and drop off goods. Crossfield Street is used for parking by staff, customers, contractors and delivery vehicles”</i></p>	<p>Crossfield Street would be temporarily opened up and linked to Coffey Street. These streets would then operate in a one-way direction, with traffic entering Crossfield Street and exiting via Coffey Street. Vehicles would still be able to access these businesses for loading and unloading.</p> <p>Business and workplace occupiers at Crossfield Street were identified as a sensitive receptor within the <i>Environmental Statement</i>, Vol 23, Section 12. Table 12.10.1 identifies that for this receptor there are no significant adverse effects on cyclists, highway users and parking users, but the adverse effect on pedestrians is significant.</p> <p>As stated in the <i>CoCP Part A</i> (Section 5.3), pedestrian access to premises would be maintained and suitable signage and lighting and barriers provided.</p>
12.	8.2.79	<p><i>“During the construction phase all temporary bus stops by DDA compliant and have shelters.”</i></p>	<p>This has not been requested by Transport for London, which is responsible for the bus stops. We will therefore need to consult Transport for London.</p>

## 1.4 Section 106 Heads of Terms and other legal agreements

- 1.4.1 We continue our discussions with LB Lewisham to agree Section 106 obligations, DCO Requirements and the mechanism for securing Thames Water’s published policies relating to noise insulation and temporary re housing. The detail of these negotiations and agreements will be reported in the *Statement of Common Ground*.

## 1.5 Site-specific matters

**Table 1.2 Site-specific matters**

Ref	LIR para. ref	Issue	Our response
13.	8.2.58 Deptford Church Street	<i>“The site is located in one of the most deprived areas in England and the potential impact on the education of children in an already deprived area is a major issue. The learning environment and journeys to school will be affected. Safety issues arise in relation to construction traffic and changes to the road layout and a suitable alternative fire assembly location for St Joseph’s School, supported by a safety audit, has yet to be agreed”</i>	A Stage 1 Road Safety Audit was undertaken and appended to the <a href="#">Transport Assessment</a> (Doc ref: 7.10). A Stage 2 Road Safety Audit would be undertaken by the contractor at the detailed design stage.  Our response to first written question 14.16 addresses the alternative to fire point assembly location for St Joseph’s School.
14.	8.2.67 Deptford Church Street	<i>“Access disruptions from the relocation of bus stops on Deptford Church Street as well as the re-routing of pedestrians will adversely affect businesses in Deptford town centre, the borough’s third largest centre after Lewisham and Catford.”</i>	Although bus stops would be relocated and pedestrian diversions put in place, Deptford town centre would still be accessible and in the <i>Environmental Statement</i> , the impact on bus passengers using services along Deptford Church Street (A2209) is considered to be negligible ( <i>Environmental Statement</i> , Vol 23, Table 12.10.1). Therefore, we consider that the businesses would not be significantly affected. In terms of pedestrians, the <i>Environmental Statement</i> concludes that there would be a significant adverse effect on pedestrians using Coffey Street, Crossfield Street or Deptford Church Street for access and as a through route. Measures incorporated within the <i>CoCP</i> Parts A and B aim to reduce the impact of the construction on transport users.
15.	8.2.77 Deptford Church Street	<i>“Clear wayfinding signage and information boards are required in order to assist all road users, including cyclists, public transport users and pedestrians in navigating the footpath / route closures and diversions associated with the works.</i>	Signage and provision for temporary footpath directions are required by Requirement PW11.  The <i>CoCP</i> Part A (Section 5.3) also states that pedestrian access to business premises would be maintained and suitable signage,

Response to London Borough of Lewisham Local Impact Report

Ref	LIR para. ref	Issue	Our response
		<i>Improvements to the pedestrian environment and routes around the works site are needed, particularly to the school from Deptford Church Street.</i>	lighting and barriers provided.
16.	8.3.4 Greenwich Pumping Station	<i>“The Council is concerned that the impact on Deptford Creek has not been thoroughly assessed. It is proposed that chalk spoil from the tunnel boring machine in the GFT will be handled in liquid form and transported by pipeline to a location within Phoenix Wharf where it will be de-watered and rendered fit for transport by road and for disposal as a caked material.”</i>	<p>The tunnel boring machine is likely to be a slurry balance machine for the anticipated ground conditions. The site layouts submitted have the slurry processing plant on the north side of the site on Phoenix Wharf.</p> <p>The pipeline from the shaft to the processing area would be within the limits of land to be acquired or used rather than along the Deptford Creek.</p> <p>See row 2 above regarding control and protection measures included in the CoCP with respect to water resources.</p>
17.	8.3.9 Greenwich Pumping Station	<i>“The Council is concerned at this level of road traffic and the cumulative transport effects of multiple Thames Tunnel sites and multiple large developments coming forward in both LB Lewisham and the Royal Borough of Greenwich should be thoroughly considered and assessed in the Environmental Statement. This does not appear to have been done.”</i>	<p>The <i>Environmental Statement</i> (Doc ref: 6.2.24, <a href="#">Vol 24</a> Greenwich Pumping Station, paras. 12.3.5, 12.3.6 and 12.4.65) take account of other project sites as well as other large developments in the area.</p> <p><i>“The effect of all other Thames Tideway Tunnel project sites on the area surrounding Greenwich Pumping Station has been taken into account within the assessment of the peak year of construction at this site.</i></p> <p><i>“As indicated in the site development schedule (see Vol 24 <a href="#">Appendix N</a>), all of the other developments identified within 1km of the Greenwich Pumping Station site would be complete and operational by Site Year 3 of construction and therefore form part of the base case. These developments are:</i></p> <ol style="list-style-type: none"> <li><i>a. Block E, 43-81 Greenwich High Road (A206)</i></li> <li><i>b. 83-87 Greenwich High Road (A206)</i></li> <li><i>c. Greenwich Industrial Estate</i></li> </ol>

## Response to London Borough of Lewisham Local Impact Report

Ref	LIR para. ref	Issue	Our response
			<p>d. <i>Hilton's Wharf</i></p> <p>e. <i>Development on site of old Seagar Distillery and Norfolk House</i></p> <p>f. <i>Greenwich Reach East</i></p> <p>g. <i>Bardsley Lane development</i></p> <p>h. <i>Development on land at Stockwell Street and John Humphries House</i></p> <p>i. <i>Development on land opposite North Greenwich Pier.</i>" (paras. 12.3.5 to 12.3.6).</p> <p><i>"With regard to the identification of additional receptors associated with the other developments included in the base case, the following developments on the list provided in para. 12.3.6 are within 250m of the site:</i></p> <p>a. <i>redevelopment of Block E of 43-81 Greenwich High Road (A206) (change of use from office to hotel) – already included as a receptor in Vol 24 Table 12.4.2</i></p> <p>b. <i>development of 83-87 Greenwich High Road (A206) (mixed use commercial and residential scheme)</i></p> <p>c. <i>redevelopment of Greenwich Industrial Estate (mixed use residential, education, leisure and community uses)</i></p> <p>d. <i>Hilton's Wharf (mixed residential and office scheme).</i>" (para. 12.4.65).</p> <p>Taking the above into consideration, a summary of the assessment outcomes are included in <i>Environmental Statement</i> Vol 24, Section 12, Table 12.10.1. This shows that there are no significant effects in terms of transport on the receptors identified.</p>
18.	8.3.10	<i>"The scope for increased barge movements, using Deptford Creek, and reducing road traffic from the</i>	See the <a href="#">Transport Strategy</a> (Doc ref 7.09), which sets out the overall approach to the transport of materials for the project. Section 6.3

## Response to London Borough of Lewisham Local Impact Report

Ref	LIR para. ref	Issue	Our response
	Greenwich Pumping Station	<i>Greenwich Pumping Station site is encouraged however it is noted that when the bridge is lifted to allow barge movements, the road is closed to all traffic (pedestrians, cyclists and vehicles) for more than ten minutes. Frequent lifting of the bridge could result in traffic congestion and rat-running from the strategic road network onto residential roads. The scope for increased barge movements should be investigated further and the impact on the highway network should be assessed."</i>	sets out the rationale for areas where river usage is not proposed, including the transport of materials along Deptford Creek to Greenwich Pumping Station. However, as stated in para. 7.1.1, the strategy does not preclude the contractor from increasing the use of river transport where safe, practicable and cost-effective.  Please refer to the <i>Draft Framework for the Transport Strategy securing mechanism</i> in Appendix A of the <i>Response to the Local Impact Report from the Mayor of London</i> (Doc ref: APP30.15) for a summary stakeholder involvement in the delivery of the process for delivering the <i>Transport Strategy</i> .
19.	9.2.18 Greenwich Pumping Station	<i>"The main issue at Greenwich Pumping Station of concern to the Council is the handling, management and transport of excavation spoil, which requires a detailed section of its own within Part B of the CoCP in order to improve the level of protection afforded to Deptford Creek (half of which is in LB Lewisham) and the occupiers of land on the eastern side of the Creek (in LB Lewisham)."</i>	See our response at row 2 above.

## Copyright notice

Copyright © Thames Water Utilities Limited December 2013.  
All rights reserved.

Any plans, drawings, designs and materials (materials) submitted by Thames Water Utilities Limited (Thames Water) as part of this application for Development Consent to the Planning Inspectorate are protected by copyright. You may only use this material (including making copies of it) in order to (a) inspect those plans, drawings, designs and materials at a more convenient time or place; or (b) to facilitate the exercise of a right to participate in the pre-examination or examination stages of the application which is available under the Planning Act 2008 and related regulations. Use for any other purpose is prohibited and further copies must not be made without the prior written consent of Thames Water.

### **Thames Water Utilities Limited**

Clearwater Court, Vastern Road, Reading RG1 8DB

The Thames Water logo and Thames Tideway Tunnel logo are © Thames Water Utilities Limited. All rights reserved.