

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 Wandsworth

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**Thames
Tideway Tunnel**



Creating a cleaner, healthier River Thames

1 Response to London Borough of Wandsworth 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 Wandsworth (the 'LB Wandsworth') to the Examining Authority (the 'ExA') for the 4 November 2013 deadline.
- 1.1.2 A number of the comments raised in the LIR are already subject to discussion as part of the ongoing *Statement of Common Ground (SoCG)*.
- 1.1.3 Responses to borough-wide matters set out by LB Wandsworth in its LIR are set out in Table 1.1 below. Responses to site-specific comments are set out in Table 1.2 to Table 1.8 below.

Table 1.1 Borough-wide matters

Ref	LIR para. ref	London Borough of Wandsworth comment	Our response
3.0 Borough-wide impacts			
Relevant Development Plan policies			
1.		<p><i>"The following policies and plans are relevant in considering the project as a whole:</i></p> <p>Relevant development plan policies:</p> <p>Core Strategy:</p> <p><i>"PL1 Attractive and distinctive neighbourhoods and regeneration initiatives PL2 Flood risk PL3 Transport PL4 Open space and the natural environment PL6 Meeting the needs of the local economy PL7 Land for industry and waste PL9 River Thames and the riverside PL10 The Wandle Valley PL11 Nine Elms and the adjoining area in north-east Battersea PL12</i></p>	<p>The ExA has advised that policies of a general nature which cover topics already addressed within the National Policy Statement for Waste Water (the 'NPS') are unlikely to be important and relevant. Site allocations and site-specific designations and guidance are more likely to be important and relevant.</p> <p>We have included a list of local policies and designations in Appendix C of the Initial LBW SoCG which are of relevance to the decision making framework set out in Planning Act 2008.</p> <p>Further discussion can take place with LBW under the SoCG regarding the relevant of policies.</p>

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		<p><i>Central Wandsworth and the Wandle Delta IS1 Sustainable Development IS2 Sustainable design, low carbon development and renewable energy IS3 Good quality design and townscape IS4 Protecting and enhancing environmental quality IS6 Community services and the provision of infrastructure · IS7 Planning Obligations”</i></p> <p>Development Management Policies Document: <i>DMS 1 General development principles - Sustainable urban design and the quality of the environment DMS 2 Managing the historic environment DMS 3 Sustainable design and low-carbon energy DMS 5 Flood risk management DMS 6 Sustainable Drainage Systems DMO 3 Open spaces in new development DMO 4 Nature conservation DMO 5 Trees DMO 6 Riverside development DMO 7 Development in the river and on the foreshore DMO 8 Focal points of activity DMC 2 Provision of new and improved community facilities DMT 1 Transport impacts of development DMT 3 Riverside walking and cycling routes DMT 4 Land for transport functions.</i></p> <p><i>Site Specific Allocations Document</i> <i>Area Spatial Strategy for Nine Elms Area Spatial Strategy for Land between Armoury Way and the Railway Some of the sites that are identified in the SSAD also form part of Thames Water’s DCO sites:</i> <i>The SSAD sites that form part of the Kirtling street DCO site are: Kirtling Wharf, Warehouse 88 Kirtling Street, Securicor Site, 80 Kirtling Street, Depot</i></p>	

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		<p><i>Kirtling Street, Cable and Wireless site unit 2a Battersea Park Road, Brooks Court, Kirtling Street, and Former petrol filling station Nine Elms Lane.</i></p> <p><i>The SSAD sites that forms part of the Dormay Street DCO site is the Keltbray site, Wentworth House and adjacent land at Dormay Street and the Causeway Island including land to the east site.</i></p> <p><i>The SSAD sites that form part of the Heathwall Pumping Station DCO site are Middle Wharf and Heathwall Pumping Station.</i></p> <p><i>The development plan policies are currently subject to review. The Local Plan is at proposed submission stage. However, it is not considered that any of the proposed changes in the draft Revised Local Plan have a direct impact on the Thames Tideway Tunnel.</i></p> <p><i>Other relevant plans and strategies</i></p> <p><i>Vauxhall Nine Elms Opportunity Area Planning Framework</i></p>	
Heritage, design and visual			
2.	3.1.2	<p><i>“Across all of the sites a common approach to the design of the ventilation columns is suggested, the details are yet to be agreed. It is understood by the Council that the design principles are included as part of the DCO as per the landscaping requirement, however this should be confirmed. The principle of having one common design is supported, however, the design should contribute towards the enhancement of the local area for it to be considered</i></p>	<p>Design principle FNCC.03 states that the ‘signature’ design shall be used for all ventilation columns serving the shaft, except where stated otherwise in site-specific principles. The design principles are secured by Requirement PW7.</p> <p>Sites where signature design columns are to be used are:</p> <ul style="list-style-type: none"> • Putney Embankment Foreshore • King George Park • Heathwall Pumping Station.

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		<i>a positive impact and this consideration needs to be made before agreeing a common approach. Details of the design would be agreed by the Council as discharge of requirement which is considered acceptable.”</i>	By virtue of site-specific Requirements (PUTEF22, KNGGP13 and HEAPS16), the details shall be submitted to the local authority for approval in accordance with the column types.
Transport			
3.	3.1.4	<i>“Throughout the pre application process the Council has insisted that river use is maximised where possible. It is proposed by Thames Water that 90 per cent of the excavated materials on riverside sites would be handled by barge movements but that most other materials are to be transported via the road network. The use of barges to transport materials by river is in accordance with Core Strategy Policy IS1(b). The impact on the road network in terms of the increase in traffic levels is identified in the Transport Assessment as insignificant; however the Council consider that a further increase in barge movements would further reduce the likelihood of any such impact. The Council considers that barge use could be increased by making use of barges to transport construction materials.”</i>	See the Transport Strategy (Doc ref: 7.09), which sets out the overall approach to the transport of materials for the project. Section 6.3 sets out the rationale for areas where river usage is not proposed. However, as stated in para. 7.1.1, the strategy does not preclude any appointed contractor from increasing the use of river transport, wherever safe, practicable and cost-effective. In addition to the current commitments, we would provide incentives within the construction contract to transport more material by river.
4.	3.1.6	<i>“The Council does have a concern about the possible impact of the River not being an option at the time of construction. The Transport assessment assumes that 90 per cent of excavated material from the main tunnel and 90 per cent of secondary lining aggregates would be transported by barge. If this figure could not be achieved, or the river was not an</i>	A summary of the draft mechanism for securing the <i>Transport Strategy</i> has been prepared through discussions with Greater London Authority, Transport for London (TfL), the PLA and the affected London Boroughs, including the London Borough of Wandsworth. See the Draft Framework for the Transport Strategy securing mechanism (Appendix A of Response to LIR from Mayor of London (App30.15) submitted on 2 December 2013.

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		<p><i>available option for a substantive period of time if at all, then the impact on the road network could be severe. Thames Water are discussing how they might manage derogations from the agreed Transport Strategy, both short term due to operational difficulties or more substantive resulting from exceptional circumstances. It is proposed that Thames Water will enter into a Transport Strategy Agreement to manage these potential occurrences. The Council would reserve its judgement and the acceptability of any such Agreement, until further progress has been made. If a situation arose by which the River was no longer an option for the transport of materials the impact on the road network would be such that this Council could no longer support this application.”</i></p>	<p>It also sets out the processes for derogations. The contractor would develop contingency plans to identify events which may lead to a derogation, so appropriate mitigation can be planned for and implemented, to minimise the likelihood of the derogation.</p> <p>Discussions are on-going to finalise this mechanism, with the next transport strategy workshop scheduled for 2 December 2013.</p>
5.	3.1.10	<p><i>“As the Council does not know what the exact mitigation measures are, uncertainties exist as to what the actual noise effects will be. It is considered that Thames Water has not sufficiently demonstrated options for the mitigation of noise at source. Such mitigation is crucial in helping to prevent a range of alternative scenarios – which the Council deem unacceptable. Such scenarios include providing mitigation at noise receptors, rehousing, or, in extreme cases, compulsory purchase of affected properties.”</i></p>	<p>Mitigation measures identified to reduce noise at source were embedded in the revised Code of Construction Practice (CoCP) Part A Section 6 (Doc ref: 9.21) (September 2013) and Part B (Doc ref: 9.22 site-specific measures). The CoCP is secured by Requirement PW6 and the CoCP Part Bs are secured by site-specific requirements (PUTEF1, CARR1, DRMST1, KNGGP1, FALPS1, KRTST1, and HEAPS1). Measures to mitigate noise at source at the site-specific level have been identified in the CoCP Part Bs for the sites within LB Wandsworth and are shown on the mitigation plans presented in Appendix APP11.09.01 to the response to the first written questions.</p> <p>These measures were factored into the noise and vibration assessments.</p>

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			<p>The principal means of minimising construction noise and avoiding nuisance is to apply Best Practicable Means mitigation measures on site. These are set out in the CoCP Part Bs. With any further practicable measures to be developed by the contractor and secured by local authority via consents under section 61 of the Control of Pollution Act before works commence on site.</p> <p>The CoCP measures reflect Best Practicable Means (BPM) (defined in the Control of Pollution Act 1974 (COPA) and set out in British Standard 5228). Further information on how adherence to BPM would be ensured and enforced is set out in our response to first written question 11.10.</p> <p>The Mitigation Route Map (Doc Ref: 9.07) details mitigation measures referred to in the ES and how they are secured.</p> <p>We consider that there are no further practicable on-site mitigation measures that can be applied to the construction sites. The contractor would be required to comply with the measures set out in the CoCP.</p> <p>The identification of noise insulation or temporary re-housing to address remaining adverse effects is consistent with mitigation strategies employed on other infrastructure projects such as Crossrail.</p>
Air quality			
6.	3.1.14	<p><i>“The enforcement of controls on emissions is to be by contractual arrangements relating to payments for compliance. There is some concern over the potential quality of enforcement that will be followed and so the strict adherence to proposed measures. However, there is provision for further involvement by the</i></p>	<p>Enforcement of controls on emissions is not proposed to be related to payments for compliance.</p> <p>Regarding construction, controls on emissions are detailed in the the CoCP Part A (Section 7) and compliance with the CoCP is requirement of the DCO (PW6) and non-compliance would be a criminal offence.</p>

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		<i>Council when this is found necessary.</i>	Regarding operation, Requirement PW8 requires that the authorised development shall be operated and maintained in accordance with the Air Management Plan (Doc Ref: 7.14). Further discussions can take place with LBW to clarify matters.
7.	3.1.17	<i>“The CoCP Part A, paragraph 7.5.6 refers to alert systems to be in place at certain sites with a higher risk of impacts from dust/particles. It is not clear whether Kirtling Street is included within this, but this site should be included due to the scale of potentially dusty operations being carried out and the degree of other major works in the area.”</i>	Kirtling Street is considered a high-risk site (as are all the drive sites) and will be subject to these alert systems. See the revised CoCP Part A, para. 7.4.5, p. 46.
Land quality			
8.	3.1.21	<i>“One issue that is unclear from the submissions on sites that may be impacted by contaminants is the treatment of the land cover on parts of the sites around the areas taken up by the shaft finish, plant structures, access yards, etc. There is a possibility that these areas may have free access but still have the presence of residual contaminants in the shallow soils. It should be demonstrated that there is no possibility for unacceptable exposure to residual pollutants to arise in the finished sites. Subject to the comment in the last paragraph being satisfied, the ground works associated with the tunnel sites will lead to an improvement in land quality.”</i>	The measures included in the CoCP and DCO Requirements include the production of a land quality validation report. This would be approved by the Environment Agency and the local authority. The Environment Agency has provided some suggested text for the contaminated land requirements. We are currently reviewing these requirements with the EA and will take into account other representations made.
Socio-economics			
9.	3.1.25	<i>“The Nine Elms sites are in the middle of a £9bn regeneration area of which over 13,000 units of</i>	In order to minimise the impact and coordinate the works, we are participating in the working groups established by the Nine Elms

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		<i>housing and 50,000 sqm of commercial floorspace already has planning consent including the new US Embassy and Battersea Power Station Town Centre. The Council understands the importance of the Thames Tunnel project but it needs to be undertaken in a way which does not risk the long term economic regeneration on a scale of national significance.”</i>	<p>Vauxhall Partnership established by the London Boroughs of Wandsworth and Lambeth to look at synergies and opportunities. These include:</p> <ul style="list-style-type: none"> • A Construction Logistics Study considering cumulative construction traffic impacts and mitigation measures for all developments in area • A Utilities Master Plan, considering coordination of utility provision • A Joint Jetty Study looking at jetty needs for removal of excavated material from the project site, Battersea Power Station and the Northern Line Extension <p>We are also attending regular synergy meetings with NLE, Battersea Power Station and Riverlight.</p>

Table 1.2 Barn Elms matters

Ref	LIR para. ref	London Borough of Wandsworth comment	Our response
4.2 Site-specific impacts			
Relevant development plan policies			
10.	4.1.7	<p><i>This site is subject to the London Borough of Richmond’s planning policies.</i></p> <p>Other relevant plans and strategies</p> <p><i>All London Green Grid – Arcadian Thames Area Framework</i></p>	<p>The ExA has advised that policies of a general nature which cover topics already addressed within the NPS are unlikely to be important and relevant. Site allocations and site-specific designations and guidance are more likely to be important and relevant.</p> <p>We have included a list of local policies and designations in Appendix C of the Initial LBW SoCG which are of relevance to the</p>

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			<p>decision making framework set out in Planning Act 2008.</p> <p>Further discussion can take place with LBW under the SoCG regarding the relevant of policies.</p>
Heritage, design and visual			
Transport			
11.	4.2.2	<p><i>“The main access route to this worksite is from Rocks Lane via Queen Elizabeth Walk. These are both in the London Borough of Richmond-Upon-Thames. The Council has commented on the Transport Assessment and is broadly in agreement with its findings. There is no proposal to use the River for moving materials so it relies totally on the road system. However, the adequacy of the load bearing of the railway bridges would be critical to the final routing of the traffic and the Council will be interested in the resolution of these matters. There is no access from the site to the east and it is not expected that workers would use the area of Putney for parking. However it remains important that the Travel Plan ensures the site workforce do not travel by private car.”</i></p>	<p>1) Response regarding the load bearing railway bridge: We understand that there is no weight limit restriction on this bridge (Hammersmith Bridge). There is a weight limit sign near the bridge that is in position as a local lorry movement management scheme. This sign provides advance warning to drivers of a weight-restricted bridge ahead on this route. We are in discussions with Network Rail as part of ongoing stakeholder engagement. From these discussions, we understand that Network Rail plans to refurbish and upgrade Rocks Lane Bridge in 2014 or 2015. We also understand that this is an old road bridge over the railway line, which is in need of repair.</p> <p>2) Response regarding the travel plans: No worker parking would be provided on the site boundary and the parking on the surrounding sites is restricted. Measures to reduce car use would also be managed through the Draft Project Framework Travel Plan (Doc ref: 7.11) and site-specific travel plans that would be developed by the contractor.</p>
Health			
12.	4.2.5	<p><i>“Population impact: Barn Elms is not an area of deprivation. The nearest GP is over half a mile from the site, which complicates statements about health needs but the rates of asthma, COPD (a respiratory</i></p>	<p>Access to the recreation ground from the north, through the pedestrian access close to the changing, rooms will be maintained, although the location of the access may be relocated a short</p>

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		<i>condition), and obesity are lower than the Wandsworth average indicating no local vulnerabilities to construction. The impact will be on people that use the green space for recreation, it is queried whether access to the recreation ground will be restricted or closed to those people accessing from the north of the park. It is unknown how many people will be affected, but it is noted that the final impact is neutral due to a reprovision of existing facilities.”</i>	distance depending on the final layout of the construction site.

Table 1.3 Matters relating to Putney Embankment Foreshore

Ref	LIR para. ref	London Borough of Wandsworth comment	Our response
5.1 Site related matters			
Relevant Development Plan Policies			
13.	5.1.13	<p><i>The relevant local policies and designations regarding this site are as follows:</i></p> <p>Core Strategy:</p> <p><i>PL1 Attractive and distinctive neighbourhoods and regeneration initiatives PL2 Flood risk PL3 Transport PL4 Open space and the natural environment PL9 River Thames and the riverside IS1 Sustainable Development IS2 Sustainable design, low carbon development and renewable energy IS3 Good quality design and townscape IS4 Protecting and enhancing environmental quality IS6 Community</i></p>	<p>The ExA has advised that policies of a general nature which cover topics already addressed within the NPS are unlikely to be important and relevant. Site allocations and site-specific designations and guidance are more likely to be important and relevant.</p> <p>We have included a list of local policies and designations in Appendix C of the Initial LBW SoCG which are of relevance to the decision making framework set out in Planning Act 2008.</p> <p>Further discussion can take place with LBW under the SoCG regarding the relevant of policies.</p>

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		<p><i>services and the provision of infrastructure IS7 Planning Obligations</i></p> <p>Development Management Policies Document:</p> <p><i>DMS 1 General development principles - Sustainable urban design and the quality of the environment DMS 2 Managing the historic environment DMS 3 Sustainable design and low-carbon energy DMS 5 Flood risk management DMS 6 Sustainable Drainage System DMO 1 Protection and enhancement of open spaces DMO 3 Open spaces in new development DMO 4 Nature conservation DMO 5 Trees DMO 6 Riverside development DMO 7 Development in the river and on the foreshore DMT 1 Transport impacts of development DMT 3 Riverside walking and cycling routes</i></p>	
Relevant planning history and any associated issues (including pipeline development)			
14.	5.1.18	<p><i>“Thames Water has stated that the proposed temporary and permanent works would be configured in order to ensure that the implementation of the applications for the redevelopment of the vaults at 2-6 Putney High Street within Putney Bridge is not affected. The redevelopment of the vaults is a long term aspiration of the Council and the Council welcomes potential mitigation measures to ensure the redevelopment of the vaults.”</i></p>	This is confirmed as discussed in the Initial LBW SoCG, p. 82.

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5.2 Site-specific impacts			
Heritage, design and visual			
15.	5.2.2	<i>“The location of the electrical and control kiosk on Watermans Green is considered acceptable however the Council would prefer the kiosk to be located out of sight in one of the vaults to the south of the site. This would exclude 2, 4 and 6 Upper Richmond Road which have planning consent to open the vaults for use on Watermans Green. Enclosing the kiosk in one of the alternative vaults would ensure that visual impact of the proposals are minimised to the wing wall of the Grade II listed Putney Bridge, protecting and reinforcing the character and heritage of the site in accordance with Core Strategy Policy IS3. The Council’s preferred arrangement of the kiosk has been identified in the Statement of Common Ground as a matter still to be agreed.”</i>	<p>The location of the electrical and control kiosk on Waterman’s Green has been subject to extensive discussions, see pp. 82 tp 84 of the Initial LBW SoCG.</p> <p>The main kiosk is proposed to be located within the defined parameters on Waterman’s Green.</p>
16.	5.2.3	<i>“The proposed foreshore structure will be located within the setting of the listed Putney Bridge and within the Putney Embankment Conservation Area. The Council is, therefore, concerned that the structure should not harm the setting of the Bridge and the Conservation Area.”</i>	Refer to response to para. 5.2.4.
17.	5.2.4	<i>“Whilst the broad principles concerning the location and shape of the foreshore structure and the location of the CSO are accepted, there are more detailed aspects of the design that are, as yet, unresolved and these could still affect the setting of</i>	<p>In terms of design, we have engaged with stakeholders, including LB Wandsworth.</p> <p>We are pleased to have reached a level of consensus with LBW on the design so far and acknowledge that there is still much consultation on the development of the detailed design needed in</p>

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		<p><i>the Bridge and fail to preserve the appearance of the Conservation Area. The Council is also consulting on a review of its Local Views Supplementary Planning Document. One of the views contained in the draft document is that of Putney Embankment from Putney Bridge. It is therefore important that the design of the promontory is of a high standard and sympathetic to the existing Embankment. The Council would also ask Thames Water to ensure that that the design of the shape of the promontory will not lead to the accumulation of rubbish around the inner corners. This would be a negative impact if not prevented.”</i></p>	<p>order to achieve the high quality we both expect. This process of development is captured in Requirement PUTEF2 which requires that prior to the commencement of construction of any permanent above ground structure, including the top of the interception chamber where it is above the level of the foreshore, details of the design (including size, external appearance and samples of materials) which shall accord with the design principles for this site, the Site works parameter plan and the indicative Foreshore kiosk design intent plan (Drawing No. DCO-PP-05X-PUTEF-080026), shall be submitted to and approved by the local planning authority in consultation with the Historic Buildings and Monuments Commission for England.</p> <p>Design principle PUTEF.02 states that the interception chamber shall be finished in high quality, fair-faced concrete that complements the existing finish of the bridge.</p> <p>Design principle PUTEF.19 states that the river wall of the permanent foreshore structure shall be finished in natural stone with vertical timber fenders on the outer face and horizontal fenders on the upstream and downstream faces.</p> <p>Predicting the behavior of the river in relation to deposition of rubbish is extremely difficult. However, noting LBW’s concerns on the accumulation of rubbish design principle PUTEF.15 states that provision shall be made for the potential extension of the platform to reduce the accumulation of sediment/debris in the foreshore area between the existing river walls and the foreshore structure.</p>
18.	5.2.5	<p><i>“The CSO interception structure, in particular, could appear to be an incongruous addition to the Bridge and Council considers that the preferred design could be improved”.</i></p>	<p>Putney Bridge is particularly elegant, and our proposed interception structure has been developed to minimise our impact on it in a similarly simple and elegant way through the following means:</p> <ul style="list-style-type: none"> • We have reduced the scale of the structure to an absolute

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			<p>minimum. This has been a considerable engineering challenge (you will note that most other interception structures on the project have access hatches which are protected by flood defence walls).</p> <ul style="list-style-type: none"> • The three dimensional elliptical form of the structure is designed to mirror the form of the flat arches in the bridge. • The fair faced concrete finish and detailing of the structure can be developed in consultation with LBW to complement or match the stone finish of the bridge as closely as possible. <p>In conclusion we feel the design is appropriate. It is illustrated in our response to first written question 8.6.</p>
19.	5.2.6	<p><i>“The foreshore structure is a large intervention in a unique and potentially fragile historic context and will inevitably result in a significant change. It is accepted that the foreshore structure offers potential benefits to the public realm. However, great care will be required to ensure that it will be integrated as sensitively as possible with the Embankment and that the benefits it offers can be realised without harm to the special character of the Conservation Area. This includes the protection of the mature plane trees adjacent to the construction site. The Council is concerned, therefore, to seek assurances that Thames Water is committed to delivering detailed design solutions of the highest quality as the scheme progresses.”</i></p>	<p>The mature plane trees will be protected as secured through the CoCP Part B Putney embankment Foreshore (Doc ref: 9.22.04). They may require pruning to allow construction. The method for undertaking works to trees is set out in CoCP Part A, Section 11.6. See also response to para 5.2.4.</p>
20.	5.2.7	<p><i>“The proposed CSO Interception structure is located beneath and against the southern arch of the Bridge. Because it is proposed to be attached to the listed</i></p>	<p>A photomontage of the proposed CSO interception structure is provided in our response to first written question 8.6.</p>

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		<i>building the Council considers that the works will require listed building consent. The CSO structure will be visible, particularly at low tide and there is concern that it would be likely to affect the special character of the listed building. The foreshore structure will appear in views of Putney Bridge and is considered by the Council to affect the setting of this listed building.”</i>	<p>The combined effect of sections 33(1)(i) and 115(5) of the Planning Act 2008 is that listed building consent is not required to be obtained for the CSO interception structure or the foreshore structure at the Putney Embankment Foreshore site. In addition, para. 8 of Schedule 9 to the Draft DCO (Doc ref: 9.20) provides that the provisions of the Order authorising the construction, maintenance or use of the authorised project have effect notwithstanding the provisions of (a) the Planning (Listed Buildings and Conversation Areas) Act 1990 and (b) any other enactment relating to historic buildings.</p> <p>We have proposed specific controls in relation to the works affecting the listed buildings and structures at this site, by way of Requirements PUTEF6, PUTEF7 and PUTEF 8.</p>
21.	5.2.8	<i>“The grade II listed bollards are proposed to be removed and stored off site until relocation. However, the proposed site of relocation bears little resemblance to the existing location where they can be seen as a group. The University boat race stone would remain onsite and protected during construction works.”</i>	Requirement PUTEF6 states that the listed bollards shall be reinstated in the location shown on the indicative Proposed Landscape plan (Drawing nos. DCO-PP-05X-PUTEF-080013 and DCO-PP-05X-PUTEF-080014) or a location agreed by the local planning authority in consultation with the Historic Buildings and Monuments Commission for England. The exact arrangement can be determined at a later stage, as agreed by the local planning authority
Transport			
22.	5.2.10	<i>“The average peak daily construction lorry vehicle movement is a maximum of 42 movements per day per direction. It is important that this traffic is managed such that only essential traffic uses Putney High Street. This should be limited to those movements, where the origin or destination is to the west. Traffic heading east should use Putney Bridge</i>	The route of the construction vehicles between the worksite and the Transport for London Road Network/Strategic Road Network is fixed, as described in the CoCP Part B Section 5. A site-specific traffic management plan would be produced by the contractor for approval by the local authority and highways agency. LB Wandsworth would be able to request that a regular monitoring

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		<i>Road to access the strategic road network at the Wandsworth One-Way System. Thames Water’s modelling indicates that the construction traffic generated by the works would not have a significant impact on traffic conditions. The Transport Assessment is being considered for validity by TFL. To ensure the traffic movements are kept to the agreed level it is requested that the contractor produces a regular monitoring report on the route of the vehicles to the Council. This would be set out in the Transport Management Plan.”</i>	report forms part of the traffic management plan.
23.	5.2.14	<i>“The Council has development proposals for part pedestrianisation of the Putney Embankment. However, this work has been delayed due to the Thames Tunnel Project. The Council would wish to work with Thames Water to ensure the pedestrianisation scheme will be taken forward as part of the Thames Tunnel works to the Embankment.”</i>	Requirement PUTEF13 requires landscaping works to be approved by the LB Wandsworth. The proposals at this site as set out in the application are capable of inclusion within any confirmed proposals for the wider area, subject to discussion with LBW and in accordance with the above Requirement.
24.	5.2.15	<i>“There is no information at this stage as to whether residents of Putney pier would be offered a new mooring, a different boat on a different mooring or residential accommodation. Therefore it is difficult to determine how reasonable any alternative offer may be in terms of location and quality for those potentially affected.”</i>	We continue to liaise with the owners and residents to discuss impacts of the project on their properties, including temporary re-housing eligibility, and we are therefore still discussing exactly how the temporary relocation scheme would be implemented.
25.	5.2.16	<i>“The main CSO worksite is on The Embankment. While we are satisfied with the proposed access arrangements to the worksite, there are outstanding</i>	Significant discussions have taken place on this matter with LB Wandsworth through the SoCG (see p. 118 of the Initial LBW SoCG. It remains an outstanding matter.

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		<p><i>concerns around the potential impact of works-related traffic on Glendarvon Street. It is proposed that access to the temporary slipway worksite is via Glendarvon Street. The Council considers Glendarvon Street to be unacceptable for use by heavy goods vehicles. The scheme is likely to impact on parking capacity as parking is proposed to be suspended at the southern end of this street to facilitate lorry movement."</i></p>	<p>We propose to use Glendarvon Street for access for the construction and removal of the temporary slipway for two periods of up to three months during the construction and removal of the temporary slipway.</p> <p>The formation of the construction site would result in the temporary unavailability of Putney public slipway. An alternative temporary slipway is therefore necessary and proposed to maintain public river access.</p> <p>It is anticipated that an average of three heavy goods vehicles would access the temporary slipway site per day while it is constructed and subsequently dismantled. heavy goods vehicles would only access the temporary slipway site between 10am to 3pm Monday to Friday to minimise the impact on the local community. This is covered in the <i>CoCP</i> Part B.</p> <p>There is no alternative route due to the one way system.</p>
26.	5.2.18	<p><i>"During construction general concerns are likely to occur regarding residential amenity irrespective of mitigation measures set out in the DCO. The Council would seek that Thames Water provide some form of public interface to enable any issues to be dealt with in a speedy manner."</i></p>	<p>A community and public relations team will be in place to ensure activities requested of the contractor and its staff meet the project's requirements. We will also maintain a customer helpline to handle enquiries and concerns from the general public.</p> <p>The community liaison plan will outline the actions undertaken to ensure local communities are kept informed and involved throughout the works. See Section 3.2 of the <i>CoCP</i> Part A.</p>

Table 1.4 Dormay Street matters

Ref	LIR para. ref	London Borough of Wandsworth comment	Our response
6.1 Site related matters			
Relevant development plan policies			
27.	6.1.5	<p>Relevant development plan policies <i>The relevant local policies and designations regarding this site are as follows:</i></p> <p>Core Strategy: <i>PL1 Attractive and distinctive neighbourhoods and regeneration initiatives PL2 Flood risk PL3 Transport PL4 Open space and the natural environment PL6 Meeting the needs of the local economy PL7 Land for industry and waste PL9 River Thames and the riverside PL10 The Wandle Valley PL12 Central Wandsworth and the Wandle Delta IS1 Sustainable Development IS2 Sustainable design, low carbon development and renewable energy IS3 Good quality design and townscape IS4 Protecting and enhancing environmental quality IS6 Community services and the provision of infrastructure IS7 Planning Obligations</i></p> <p>Development Management Policies Document: <i>DMS 1 General development principles - Sustainable urban design and the quality of the environment DMS 2 Managing the historic environment DMS 3 Sustainable design and low-carbon energy DMS 5 Flood risk management DMS 6 Sustainable Drainage Systems DMO 1 Protection and enhancement of</i></p>	<p>The ExA has advised that policies of a general nature which cover topics already addressed within the NPS are unlikely to be important and relevant. Site allocations and site-specific designations and guidance are more likely to be important and relevant.</p> <p>We have included a list of local policies and designations in Appendix C of the Initial LBW SoCG which are of relevance to the decision making framework set out in Planning Act 2008.</p> <p>Further discussion can take place with LBW under the SoCG regarding the relevant of policies.</p>

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Ref	LIR para. ref	London Borough of Wandsworth comment	Our response
		<p><i>open spaces DMO 3 Open spaces in new development DMO 4 Nature conservation DMO 5 Trees DMO 6 Riverside development DMO 7 Development in the river and on the foreshore DMT 1 Transport impacts of development DMT 3 Riverside walking and cycling routes</i></p> <p><i>Site Specific Allocations Document Area Spatial Strategy for land between Armoury Way and the Railway Site 3.2.1 Causeway Island including land to the east Site 3.2.3 Keltbray site, Wentworth House and adjacent land at Dormay Street</i></p>	
6.2 Site-specific impacts			
Heritage, design and visual			
28.	6.2.3	<p><i>“The Council would seek the option to retain the potential temporary construction bridge as part of the works between the Keltbray area of the site to Causeway Island to establish further links to the riverside in accordance with the area spatial strategy for land between Armoury Way and the Railway.”</i></p>	<p>It is not confirmed at this stage whether a temporary bridge would be the most suitable option for the construction site. There are alternatives such as craneage which may be more appropriate for the construction site. As highlighted previously the floodwall presents difficulties and for this reason access ramps to any bridge may be suitable for construction vehicles but not for standard vehicles with lower clearance, In addition any temporary bridge would have different standards to a permanent bridge.</p>
Health			
29.	6.2.10	<p><i>“The site is in the vicinity of two Health and Safety Executive Hazardous Installations (The Scottish Nova Gas Holder and the Calor Gas site (which is NW of the gasholder) and there may need to be a PADHI assessment. The inner zone measures 110m from the gasholder, the middle zone 250m and the</i></p>	<p>We are aware of these sites and also of the nearby National Grid cable tunnel.</p> <p>A planning advice for developments near hazardous installations (PADHI) assessment is only required for specific types of development which fall within any of the CD zones. Annex 2 of the</p>

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		<i>outer zone 340m. The Health and Safety Executive may have to determine the sites suitability in the vicinity of a major hazard site.”</i>	<p>Health and Safety Executive Planning advice for developments near hazardous installations (PADHI) guidelines lists the types of development for which the Health and Safety Executive should be consulted relative to PADHI.</p> <p>The guidelines list applications for which PADHI does not deal with, which includes notifications to Health and Safety Executive for other purposes, eg, of construction work. The project maintain therefore that a PADHI assessment is not required.</p> <p>The Health and Safety Executive is a statutory consultee and were accordingly consulted at all of the various pre-application phases. This included phase one (Sept 2010 – Jan 2011), phase two (Nov 2011 – Feb 2012), targeted consultation (Jun – July 2012), Section 42 tunnel and site boundary modifications (Jun – July 2012), and Section 48 publicity (July – Oct 2012).</p> <p>We has and continues to engage with Health and Safety Executive about a range of issues, however, this particular issue has not as yet been raised. If LBW is concerned about this issue they should raise this with Health and Safety Executive for subsequent discussion.</p>

Table 1.5 King George’s Park matters

Ref	LIR para. ref	London Borough of Wandsworth comment	Our response
7.1 Site related matters			
Relevant development plan policies			
30.	7.1.7	<i>The relevant local policies and designations regarding this site are as follows:</i>	The ExA has advised that policies of a general nature which cover topics already addressed within the NPS are unlikely to be

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		<p>Core Strategy: <i>PL1 Attractive and distinctive neighbourhoods and regeneration initiatives PL2 Flood risk PL3 Transport PL4 Open space and the natural environment PL10 The Wandle Valley PL12 Central Wandsworth and the Wandle Delta IS1 Sustainable Development IS2 Sustainable design, low carbon development and renewable energy IS3 Good quality design and townscape IS4 Protecting and enhancing environmental quality IS6 Community services and the provision of infrastructure IS7 Planning Obligations</i></p> <p>Development management policies document: <i>DMS 1 General development principles - Sustainable urban design and the quality of the environment DMS 2 Managing the historic environment DMS 3 Sustainable design and low-carbon energy DMS 5 Flood risk management DMS 6 Sustainable Drainage Systems DMO 1 Protection and enhancement of open spaces DMO 3 Open spaces in new development DMO 4 Nature conservation DMO 5 Trees DMT 1 Transport impacts of development</i></p> <p>Site Specific Allocations Document <i>Area Spatial Strategy for Central Wandsworth and the Wandle Delta</i></p>	<p>important and relevant. Site allocations and site-specific designations and guidance are more likely to be important and relevant.</p> <p>We have included a list of local policies and designations in Appendix C of the Initial LBW SoCG which are of relevance to the decision making framework set out in Planning Act 2008.</p> <p>Further discussion can take place with LBW under the SoCG regarding the relevant of policies.</p>
7.2 Site-specific impacts			
Transport			
31.	7.2.4	“There is a steady flow of pedestrians and cyclists	We are committed to the highest safety standards. Measures are

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		<i>along Neville Gil Close and additional care should be taken in accessing the site, particularly by larger vehicles. Measures should be contained in the CoCP and Transport Management Plans to ensure road safety issues are given priority.”</i>	contained within the CoCP Part A to ensure cyclist and pedestrian safety around construction vehicles (see for instance 5.1.6, 5.2.1, and 5.3.5(d)). Traffic management plans would be produced for each site by the contractor for approval by the local authority and highways authority.
Ecology			
32.	7.2.5	<i>“There is still insufficient information on potential bat roosts and foraging behaviour within this area to determine whether they will be mitigated for by current proposals. This has to be treated as a significant negative impact until it can be proved otherwise.”</i>	Refer to the Updated Terrestrial Ecology Survey submitted on 23 September 2013 (Doc ref: 9.10.04) regarding bat roosts at King George's Park. The <i>Environmental Statement</i> (Doc ref: 6.02.09, Vol 9 , Section 6) considers the effects on foraging bats and takes account of mitigation embedded in the CoCP Part A and design principles and concludes that there would be no significant adverse effects on foraging bats. Following the inspection of trees in 2013 it has been confirmed that these have low to negligible bat roost potential.
Health			
33.	7.3.1	<i>“The site should not prevent people walking around the perimeter of the lake, as this is an established walking route. The flood risk is noted in para 6.2.6 and possible contamination of the immediate area is queried.”</i>	The CoCP Part B requires operating plant and equipment to be set back from the bank of the lake to leave an 8m buffer zone, unless otherwise agreed. The path would therefore be maintained. There may be short-term restrictions during the erection and removal of hoarding and for the landscaping works. The site comprises parkland and no contaminating uses have been identified within the site. Limited off-site contamination sources were identified, notably the infilled canal on the eastern boundary (beneath the existing highway), the former incandescent mantle factory and pockets of industry to the south. Given the underlying geology and distances involved, we judged that none of the off-site sources would have affected the site (see <i>Environmental</i>

Ref	LIR para. ref	London Borough of Wandsworth comment	Our response
			<i>Statement</i> , Vol 9, paras. 8.4.5 and 8.4.6).
Flood risk			
34.	7.3.3	<p><i>“The Environment Agency identified the need for flood storage capacity in the ground to facilitate flood water conveyance and reduce the flood risk to properties surrounding the park. The potential design solution is illustrated as a ‘sunken garden’ in the proposed site features (DCO-PP-09X-KNGGP-110008) and landscape plan (DCO-PP-09X-KNGGP-110009). The Council acknowledges the Environment Agency’s concerns regarding the project works at this site resulting in a reduction in conveyance of flood water and a subsequent increase in upstream flood levels, however, it the creation of the shaft head terrace, and the adjacent ‘sunken garden’, will remove some 1500sq.m of lawn area currently in use for casual recreation. <u>Thames Water has proposed ornamental herbaceous planting within the excavated depression but the Council considers that this will not be an adequate replacement. The area will not be utilisable for casual recreation, will incur high maintenance costs, and by the nature of being a depression in the ground, will be prone to being a litter trap, and indeed, will likely hold water at times of high rainfall. If the sunken garden area was not planted with herbaceous planting, but laid with grass instead the Council would still find this measure to be unacceptable as areas of sloping ground are not popular for casual recreation, nor particular popular</u></i></p>	<p>The proposed area of hardstanding above the shaft and the sunken garden as shown on the indicative landscape plan are 348 sqm and 408m² respectively.</p> <p>See Initial LBW SoCG page 11 regarding the need for, benefits of and the fact that the Environment Agency has expressed in principle support for the proposed depression.</p> <p>Regarding the use of the ‘sunken garden’ for passive recreational purposes and maintenance of the proposed depression see our response to first written question 5.12.</p> <p>The main role of the sunken garden would be flood mitigation, however, as mentioned in the <i>Environmental Statement</i> Vol 9, Section 10.6, the newly landscaped area would be designed in such a way that users would be able to continue to use it for passive recreational purposes. Additionally, some users may find that the sunken garden provides an alternative type of space and functionality to other parts of the park.</p> <p>The maintenance of the sunken garden would be typically lower than more ornamental planted areas within the wider park.</p>

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		<i>for passive use.</i>	
35.	7.3.4	<p><i>“The Council is currently working with the Environment Agency to explore different options for flood risk alleviation along the river Wandle and considers that an alternative solution to changing the levels of the park is preferable. The Council is currently progressing the Local Flood Risk Management Strategy as part of it’s duties as a Lead Local Flood Authority under the Flood and Water Management Act 2010. The strategy will contain measures to contribute to flood risk alleviation in the borough and is the preferred approach to exploring and mitigating all sources of flooding.”</i></p>	<p>See Initial LBW SoCG p. 11 regarding the need for, benefits of and the fact that the Environment Agency has expressed in principle support for the proposed flood risk solution.</p> <p>Detailed design development work, flood modelling as part of the flood risk assessment, and on-going consultation with the Environment Agency confirmed the need for flood storage capacity in the ground to facilitate flood water conveyance and reduce the flood risk to properties surrounding the park.</p> <p>The Environment Agency has produced a preliminary high-level solution to the wider flooding problems in the locality. However, this plan has not yet been shown to be technically feasible and it is understood that the requisite funding for it to be delivered is not in place.</p> <p>Our design principle KNGGP.12 requires that, <i>“the design shall incorporate re-contouring of the site to improve flood plain flow characteristics. This requires part of the existing site adjacent to the shaft to be lowered by up to 700mm. Re-contouring shall be in keeping with the character of the park and the overall landscape design for the site. The final design of the re-contoured area, as well as its management and maintenance, shall be agreed with the Environment Agency. Any approved Environment Agency Flood Alleviation Scheme shall be considered during construction and designs shall be amended accordingly, wherever practical”</i>.</p> <p>The Environment Agency has accepted the proposals. We continue to discuss this matter with LBW to seek its agreement.</p>

Table 1.6 Falconbrook Pumping Station matters

Ref	LIR para. ref	London Borough of Wandsworth comment	Our response
8.1 Site related matters			
Relevant development plan policies			
36.	8.1.7	<p><i>The relevant local policies and designations regarding this site are as follows:</i></p> <p>Core strategy:</p> <p><i>PL1 Attractive and distinctive neighbourhoods and regeneration initiatives PL2 Flood risk PL3 Transport PL4 Open space and the natural environment IS1 Sustainable Development IS2 Sustainable design, low carbon development and renewable energy IS3 Good quality design and townscape IS4 Protecting and enhancing environmental quality IS6 Community services and the provision of infrastructure IS7 Planning Obligations</i></p> <p>Development Management Policies Document:</p> <p><i>DMS 1 General development principles - Sustainable urban design and the quality of the environment DMS 2 Managing the historic environment DMS 3 Sustainable design and low-carbon energy DMS 5 Flood risk management DMS 6 Sustainable Drainage Systems DMO 1 Protection and enhancement of open spaces DMO 3 Open spaces in new development DMO 4 Nature conservation DMT 1 Transport impacts of development</i></p>	<p>The ExA has advised that policies of a general nature which cover topics already addressed within the NPS are unlikely to be important and relevant. Site allocations and site-specific designations and guidance are more likely to be important and relevant.</p> <p>We have included a list of local policies and designations in Appendix C of the Initial LBW SoCG which are of relevance to the decision making framework set out in Planning Act 2008.</p> <p>Further discussion can take place with LBW under the SoCG regarding the relevancy of policies.</p>

Ref	LIR para. ref	London Borough of Wandsworth comment	Our response
8.2 Site-specific impacts			
Heritage, design and visual			
37.	8.2.3	<i>“The Council consider that detailed design approval requirement for permanent above-ground structures is required. This is to provide certainty to the Council that any detailed design works would be for agreement by the Council in the interest of protecting public amenity. It is acknowledged that the proposed above-ground structures are within a Thames Water operational site however these structures could have the potential to have an undue effect on public amenity.”</i>	<p>We are progressing discussions on this matter with LB Wandsworth. It currently remains an outstanding matter. See p. 20 of the Initial LBW SoCG.</p> <p>We did not propose a detailed design approval Requirement because the proposed permanent above-ground structures would be within the Thames Water operational site, defined by a new well designed boundary wall. The above-ground structures would have no effect on public amenity.</p>
Transport			
38.	8.2.4	<i>“This site sits adjacent to the A217 York Road, which forms part of the Transport for London Road Network (TLRN), for which Transport for London are both the Highway and Traffic Authorities. The transport assessment indicates that the level of traffic predicted from this site can be catered for on the TLRN and the Council will agree this unless told by TfL that it has concerns as the Highway and Traffic authority. The access during construction leads straight onto the TLRN and construction traffic should then stay on this network.”</i>	<p>We have had discussions on this matter with LB Wandsworth. It currently remains an outstanding matter. See p. 81 of the Initial LBW SoCG.</p> <p>From discussions with TfL, we do not propose to provide permanent access from York Road; access would be via the existing Pumping Station access, which has been in long-term use.</p>
39.	8.2.5	<i>“Thames Water is currently proposing to access the operational site for maintenance purposes from Lavender Road, passing through the York Road Estate. It would be preferable for access to be</i>	See response to 8.2.4 above.

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		<i>retained from York Road, such that heavy vehicles including cranes do not have to pass through the residential estate and close to the York Gardens library and Community Centre. However, the highway network through the estate can cater for this traffic if necessary."</i>	
40.	8.2.6	<i>"Adjacent to the work site is the York Gardens Library and Community Centre. It is important that the Thames Tunnel worksite does not affect access to the library and community centre, which are both important focal points for the community."</i>	As stated in CoCP Part A, Section 5.3, works within the highway or on a Public Right of Way: <i>"Pedestrian access to premises will be maintained"</i> .
Socio-economics			
41.	8.2.8	<i>"The wider area is currently identified as an area for estate renewal and a masterplan exercise is taking place concurrently with the Inquiry. The project is currently at the pre application stage and the details of the changes to the area are unknown, however It would be preferable for access to the Falconbrook worksite to be retained from York Road, such that heavy vehicles including cranes do not have to pass through the residential estate."</i>	See response to 8.2.4 above. We are open to discussions relating to LBW's proposals to redevelop York Gardens.

Table 1.7 Kirtling Street matters

Ref	LIR para. ref	London Borough of Wandsworth comment	Our response
9.1 Site related matters			
Relevant development plan policies			
42.		<p><i>The relevant local policies and designations regarding this site are as follows:</i></p> <p>Core Strategy:</p> <p><i>PL1 Attractive and distinctive neighbourhoods and regeneration initiatives PL2 Flood risk PL3 Transport PL4 Open space and the natural environment PL6 Meeting the needs of the local economy PL9 River Thames and the riverside PL11 Nine Elms and the adjoining area in north-east Battersea IS1 Sustainable Development IS2 Sustainable design, low carbon development and renewable energy IS3 Good quality design and townscape IS4 Protecting and enhancing environmental quality IS6 Community services and the provision of infrastructure IS7 Planning Obligations</i></p> <p>Development Management Policies Document:</p> <p><i>DMS 1 General development principles - Sustainable urban design and the quality of the environment DMS 2 Managing the historic environment DMS 3 Sustainable design and low-carbon energy DMS 5 Flood risk management DMS 6 Sustainable Drainage Systems DMO 3 Open spaces in new development DMO 4 Nature conservation DMO 6 Riverside development DMO 7 Development in the river and on the foreshore DMT 1 Transport impacts of development DMT 3 Riverside walking and cycling</i></p>	<p>The ExA has advised that policies of a general nature which cover topics already addressed within the NPS are unlikely to be important and relevant. Site allocations and site-specific designations and guidance are more likely to be important and relevant.</p> <p>We have included a list of local policies and designations in Appendix C of the Initial LBW SoCG which are of relevance to the decision making framework set out in Planning Act 2008.</p> <p>Further discussion can take place with LBW under the SoCG regarding the relevant of policies.</p>

Ref	LIR para. ref	London Borough of Wandsworth comment	Our response
		<p><i>routes</i></p> <p>Site Specific Allocations Document:</p> <p><i>Area Spatial Strategy for Nine Elms Site 2.1.7 Kirtling Wharf Site 2.1.8 Warehouse, 88 Kirtling Street Site 2.1.2 Depot, Kirtling Street Site 2.1.3 Former Petrol Filling Station, 2 Battersea Park Road Site 2.1.11 Cable and Wireless, Ballymore Site 6, Unit 2a, Battersea Park Road Site 2.1.17 Securicor Site, 80 Kirtling Street Site 2.1.23 Brooks Court, Kirtling Street</i></p> <p>Other Documents:</p> <p><i>Vauxhall/Nine Elms/Battersea Opportunity Area Planning Framework.</i></p> <p><i>Apart from Kirtling Wharf, these sites are allocated for mixed use development.</i></p>	
Relevant planning history and any associated issues (including pipeline development)			
43.	9.1.13	<p><i>“2013/4545 – Demolition of existing ready-mix concrete batching plant and associated structures; and provision of new ready-mix concrete batching plant (29m high x 18m long x 10m wide), aggregate storage bins (29m high x 41m long x 12m wide) on the western boundary and feed conveyor, 6 x 100 tonne cement storage silos, 2 x 500 tonne cement storage silos (25m high x 6m long x 13m wide), and ancillary facilities and structures, including recycled water and fresh water storage tanks, washout and recycling bays, two-storey office accommodation and car parking. (Under consideration – See link below for planning application case).</i></p>	<p>The proposals are required by and enable the implementation of the project.</p> <p>To ensure continuity of CEMEX’s existing business in Battersea it is important that this new plant is operational before the end of 2014. This may not be achieved within the expected timetable for determination of our application. Therefore, CEMEX has submitted this separate full planning application to LBW for the new concrete plant.</p> <p>A decision by the Secretary of State on the application is expected during late 2014. Construction of the project is due to commence 2016 (with enabling works possibly in 2015).</p> <p>This planning application would allow the existing concrete batching plant on Cringle Wharf to be retained continuously</p>

Ref	LIR para. ref	London Borough of Wandsworth comment	Our response
		http://ww3.wandsworth.gov.uk/Northgate/PlanningExplorer/Generic/StdDetails.aspx?PT=Planning percent20Applications percent20On-Line&TYPE=PL/PlanningPK.xml&PARAM0=766392&XSLT=/Northgate/PlanningExplorer/SiteFiles/Skins/Wandsworth/xslt/PL/PLDetails.xslt&FT=Planning percent20Application percent20Details&PUBLIC=Y&XMLSID E=/Northgate/PlanningExplorer/SiteFiles/Skins/Wandsworth/Menu/PL.xml&DAURI=PLANNING	<p>throughout construction of the project and allow construction material to be supplied to the surrounding regeneration area which has been transported by river.</p>
<p>9.2 Site-specific impacts</p>			
<p>Heritage, design and visual</p>			
44.	9.2.1	<p><i>“The proposals require the Cemex plant to occupy approximately half of their current site and this will require aggregates to be stored in silos rather than loosely. The proposal would create some substantial and bulky structures crammed together in the southern part of the site, and there are serious visual and townscape concerns regarding the bulk, scale and appearance of the new concrete-batching and aggregate equipment to be constructed. The Council is keen to ensure these substantial structures do not prejudice the development potential of the adjacent sites, including Riverlight, Battersea Power Station and the waste transfer station to the west. The Vauxhall Nine Elms Battersea Opportunity Area Planning Framework seeks to enclose the safeguarded wharves, and the proposal could</i></p>	<p>The townscape and visual assessment in the <i>Environmental Statement</i> (Doc ref: 6.2.14, Vol 14 Kirtling Street, Section 11) considers effects on townscape character and visual receptors arising from the proposed development at Kirtling Street alongside other project sites which fall within the ZTV (zone of theoretical visibility), which at this location is Heathwall Pumping Station, Albert Embankment Foreshore and Chelsea Embankment Foreshore. Effects arising from changes within the CEMEX plant (which forms part of the Kirtling Street site) are considered as part of the overall assessment.</p> <p>In terms of townscape character, operational effects on areas surrounding Kirtling Street are found to be minor beneficial. This is predominantly due to the clearance of existing dilapidated structures and buildings, and improvements in the vicinity of Heathwall Pumping Station. The works at the CEMEX plant relocates some existing structures, including silos, while also</p>

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		<p><i>prejudice this aspiration. These structures would create negative visual impact on the surrounding regeneration area.”</i></p>	<p>installing some additional structures located further back from the river frontage. These works are considered to be broadly typical of the existing character of the area and therefore would not give rise to adverse townscape effects when considered independently. While the bulk and scale of some of the structures differs from the existing, they remain tall slender elements in the townscape contiguous with the character of the existing silos, and other features such as Battersea Power Station and the gas holders.</p> <p>In terms of visual receptors, viewpoints within the ZTV for Kirtling Street were selected in consultation with LB Wandsworth, LB Lambeth and the City of Westminster. These viewpoints include consideration of future base case developments which will be complete by the time the project would be operational, resulting in an additional viewpoint from the Riverlight development. Again, the assessment generally identifies minor beneficial effects (from across the river and the Riverlight development – viewpoints 1.7 and 1.8) and negligible effects from receptors located further inland (viewpoints 3.1 and 3.2). These assessment findings are again primarily due to the clearance of existing dilapidated buildings, highly visible in the view across the river and forming the immediate foreground of the view from the Riverlight development. From both of these locations, while the relocated and additional silos within the CEMEX plant would be visible, they would remain in keeping with the nature of existing views. While the bulk and scale would differ from some of the existing structures they would remain tall slender elements in the view and also set in the context of the waste transfer station immediately to the west. Furthermore, the relocated structures within the Cemex plant would be located further away from the river frontage than existing, helping to reduce their visual dominance from the wide open panoramas along the</p>

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			<p>river. For these reasons, it was considered that there were no visual receptors within the future baseline Battersea Power Station development which would be significantly affected, and therefore no additional viewpoints were added for these receptors.</p> <p>Redevelopment of the waste transfer station does not form part of the base case or cumulative assessment schemes.</p> <p>In summary, while the relocated and new structures within the Cemex plant would be visible, they are not considered to give rise to significant adverse effects on the basis of their similarity to the existing context of the Cemex plant and the presence of other industry and tall structures in the area, including the neighbouring waste transfer station.</p> <p>A separate planning application with an accompanying environmental statement has been prepared by Cemex and submitted to LB Wandsworth for the reconfiguration of the concrete batching plant. It should be noted that the townscape and visual impact assessment in this planning application also identifies no significant adverse effects.</p>
45.	9.2.2	<p><i>“The Council consider that detailed design approval requirement for permanent above-ground structures is required. This is to provide certainty to the Council that any detailed design works would be for agreement by the Council in the interest of protecting public amenity. It is acknowledged that the proposed above-ground structures are within a Thames Water operational site however these structures could have the potential to have an undue effect on public amenity.”</i></p>	<p>We are progressing discussions on this matter with LB Wandsworth. It currently remains an outstanding matter. See page 20 of the Initial LBW SoCG.</p> <p>We did not propose a detailed design approval Requirement because the proposed permanent above-ground structures would be situated on the safeguarded wharf surrounded by structures associated with the wharf use.</p>

Ref	LIR para. ref	London Borough of Wandsworth comment	Our response
Transport			
46.	9.2.3	<p><i>“This site is on Cringle Street and Kirtling Street, both borough roads, which both feed directly onto the A3205 Battersea Park Road/Nine Elms Lane, the former at a priority junction and the latter at a signal controlled junction. The A3205 Battersea Park Road/Nine Elms Lane is part of the Transport for London Road Network (TLRN) and as such Transport for London (TfL) is the highway and traffic authority. During the construction period Thames Water would wish to close a section of Kirtling Street which would effectively run through the centre of the work site. The Council accepts this situation during construction as the road does not serve any other property within the area but would want to see this road returned to the Council at an adoptable standard at the end of the construction period.”</i></p>	<p>As stated in Section 5.5 of CoCP Part A, which is secured by Requirement PW6, in relation to reinstatement of highways and Public Rights of Way <i>“the highway will be restored to the condition it was before the works or to a standard acceptable by the relevant highway authority in accordance with relevant legislation. Surveys will be used to establish the condition of the highway and public right of way prior to the commencement and after the completion of project works, in consultation with the highway authority. The locations where surveys will be undertaken will be identified in the traffic management plan. The highway authority will be notified of surveys and may send a representative to agree the survey if it wishes.”</i></p>
47.	9.2.5	<p><i>“The Council does have a concern about the possible impact of the River not being an option at the time of construction. The Transport assessment assumes that 90 per cent of excavated material to and from the main tunnel and 90 per cent of secondary lining aggregates would be transported by barge. If this figure could not be achieved, or the river was not available at all, then the impact on the road network could be severe. Thames water are discussing how they might manage derogations from the agreed Transport Strategy, both short term due to operational difficulties or more substantive resulting from</i></p>	<p>A summary of the draft mechanism for securing the <i>Transport Strategy</i> has been prepared through discussions with Greater London Authority, TfL, the Port of London Authority and the affected London Boroughs, including the London Borough of Wandsworth. See the <i>Draft Framework for the Transport Strategy securing mechanism</i> (Appendix A of Response to LIR from Mayor of London (App30.15) to be submitted on 2 December 2013.</p> <p>It also sets out the processes for derogations. The contractor would develop contingency plans to identify events which may lead to a derogation, so appropriate mitigation can be planned for and implemented, to minimise the likelihood of the derogation.</p> <p>Discussions are on-going to finalise this mechanism, with the next</p>

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		<i>exceptional circumstances. If a situation arose by which the River was no longer an option for the transport of materials the impact on the road network would be such that this Council could no longer support the use of this site."</i>	transport strategy workshop scheduled for 2 December 2013.
	9.2.7	<i>9.2.7 The cumulative impacts on the Western Riverside Waste Authority's existing river barge operations of increased river barge movements associated with the Thames tunnel combined with those relating to the redevelopment of Battersea Power Station, aggregate deliveries to Cemex Ltd and the Northern Line extension are a concern and are a negative effect. The PLA are the responsible authority for river navigation issues and the Council would rely on their advice for barge movements on the River Thames</i>	Navigational issues and preliminary risk assessments were undertaken for each of the worksites where river transport is proposed. These identify the potential for navigational issues and how these are to be managed. These are contained in the Navigational Issues and Preliminary Risk Assessment for Kirtling Street (Doc ref: 7.20). We have been working closely with the Port of London Authority to ensure that any potential effects in river movements are mitigated.
48.	9.2.8	<i>"There are potential knock-on effects from Thames Water's use of half of the Cemex site on options for redeveloping the Western Riverside Waste Authority's Cringle Dock waste transfer station. The Council understands that there are environmental implications with the option of redeveloping the Cringle Dock site which raises potential issues with the Kirtling Street Thames Tunnel site and vice versa."</i>	The Cringle Dock proposals are contrary to development plan policy. With regards to the redevelopment of safeguarded wharves, the development plan, in particular <i>London Plan</i> policy 7.26 requires that: <i>"Development proposals should protect existing facilities for waterborne freight traffic, in particular safeguarded wharves should only be used for waterborne freight handling use.</i> <i>"The redevelopment of safeguarded wharves for other land uses should only be accepted if the wharf is no longer viable or capable of being made viable for waterborne freight handling.</i> <i>"The only exception to this would be for a strategic proposal of essential benefit for London, which cannot be planned for and</i>

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			<p><i>delivered on any other site in Greater London.</i></p> <p><i>“Adjacent or opposite safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance”.</i></p>
49.	9.2.9	<p><i>“There are cumulative impacts of additional Thames Water waste movements by road in the vicinity of WRWA transfer stations. This could result in increased congestion and delays to the Council’s waste collection vehicles, especially in the event that barge movements are temporarily ceased due e.g. to adverse weather or a security incident.”</i></p>	<p>As stated in the Kirtling Street Transport Assessment (Doc ref: 7.10.11), there would be 192 average peak daily construction lorry movements, with approximately 20 movements in the AM and PM peak.</p> <p>The Kirtling Street junction with Battersea Park Road (A3205)/Nine Elms Lane (A3205)/New Covent Garden access would be operating within capacity in the construction base case. The addition of the project traffic at this junction results in 42 seconds per passenger car unit in the AM peak period assessed and 44 seconds per in the PM peak period assessed, this results in a negligible impact on the operation of the junction.</p> <p>At the Cringle Street junction with Nine Elms Lane (A3205) and Nine Elms Parkside will be also operating within capacity in the construction base case. The addition of the project traffic has negligible impact on the operation of the junction. The maximum increase in delay would be ten seconds in the PM peak hour for vehicles turning out of Cringle Street. The ratio of flow to capacity for this movement would increase by 8 per cent in the PM peak hour, which would be the maximum increase at this junction. This indicates that there would be an insignificant change at the junction as a result of the additional construction traffic. Therefore this will result in minor adverse effect on the Council’s waste collection vehicles.</p> <p>A sensitivity test was undertaken to examine the implications of variation in the number of construction vehicle movements in the peak month of activity at this site, including the possibility that river</p>

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			<p>transport is not available for short periods of time which could temporarily increase vehicle numbers. In the sensitivity test for Kirtling Street, the construction vehicle movements in the peak year of construction would be approximately 85 in the AM and PM peak hours. This would be an increase of 60 movements in the AM and PM peak hours compared with that for the <i>Transport Strategy</i>. The results of this sensitivity test can be found in Section 14.5 of the <i>Transport Assessment</i>.</p> <p>The contractor would develop contingency plans to identify events which may disrupt river usage so appropriate mitigation can be planned for and implemented, to minimise the likelihood of an operational derogation to transport materials by road. See the <i>Draft Framework for the Transport Strategy Mechanism</i> submitted on 2 December 2013, which sets out the processes for operational derogations.</p> <p>Discussions are on-going with the council to finalise this mechanism.</p>
50.	9.2.10	<i>“There is a need to finalise arrangements to minimise the risk of significantly increased deposits of mud and dirt relating to additional lorry movements from the construction sites.”</i>	The CoCP Part A (Doc ref: 9.21, Section 7.2) mandates following the Greater London Authority Best Practice Guidance <i>The control of dust and emissions during construction and demolition</i> , or the most recent version of this document (soon to be superseded by supplementary planning guidance of the same name), which states that vehicles – in particular wheels – should be washed or cleaned before leaving a site.
Noise, vibration and odour			
51.	9.2.12	<i>“The planning statements for Kirtling Street and Heathwall pumping station imply that the Riverlight development should have mitigated the potential</i>	See our response to para. 3.1.10 with regards to mitigating noise at source and the comprehensive measures we have identified and incorporated in the CoCP.

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		<i>impacts of the Thames Tunnel (7.01, Appendix J, paragraph J.5.123 and 7.01 Appendix K, paragraph K.5.108). This issue is of concern to the Council as when the Riverlight development was granted planning permission the Thames Tunnel project was in the initial phase of consultation and the details of potential mitigation levels were not available. The Council considers Thames Water should provide adequate mitigation at source to avoid the need to implement noise mitigation through improved sound insulation to dwellings or the need to temporarily relocate residents."</i>	<p>We continue to liaise with the developers of the Riverlight scheme to discuss impacts of the project on that development.</p> <p>Further studies are being undertaken to determine the suitability and the requirement to provide noise insulation at Riverlight as a result of the scheme. This will be discussed with St James.</p>
Ecology			
52.	9.2.13	<i>"Disturbance from in-river works during construction (comprising noise, lighting, and vibration) will have a negative impact on biodiversity although the CoCP (a) seeks to minimise or prevent many effects. Measures detailed in the CoCP (a) seek to prevent use of the site by black redstarts will result in a neutral impact. The impacts upon overwintering birds and foraging bats are inconclusive and therefore have to be treated as a significant negative impact until it can be proved otherwise. Overall there will be a negative impact on biodiversity at this location."</i>	<p>The results of the 2011 wintering bird survey and bat survey are presented in the <i>Environmental Statement</i> (Vol 14, Section 6, paras. 6.4.17 to 20 and 6.4.8 to 16), which takes account of embedded mitigation through the CoCP and the design principles and concludes that no significant adverse effects on wintering birds or bats were identified at the Kirtling Street site.</p>
Socio-economics			
53.	9.2.14	<i>"The site is in the middle of a £9bn regeneration area of which over 13,000 units of housing and 50,000 sqm of commercial floorspace already has planning</i>	<p>In order to minimise the impact and coordinate the works, further to the mitigation in the <i>Draft DCO</i>, we are participating in the working groups established by the Nine Elms Vauxhall Partnership</p>

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		<i>consent including the new US Embassy and Battersea Power Station Town Centre. The Council understands the importance of the Thames Tunnel project but it needs to be undertaken in a way which does not risk the long term economic regeneration on a scale of national significance.”</i>	<p>established by London Boroughs of Wandsworth and Lambeth to look at synergies and opportunities. These include:</p> <ul style="list-style-type: none"> • A Construction Logistics Study considering cumulative construction traffic impacts and mitigation measures for all developments in the area • A Utilities Master Plan, considering coordination of utility provision <p>A Joint Jetty Study looking at jetty needs for removal of excavated material from the project, Battersea Power Station and the Northern Line Extension</p>
54.	9.2.15	<i>“The Nine Elms Boat Community are in very close proximity to the projects main shaft site and they will potentially be affected by noise; vibration and dust at various hours of the day. Boats are not as easily adapted as buildings to deliver mitigation effects and impacts on this community will need further consideration. They themselves may have underestimated the impact and be minded to stay in this location so a sensitive evaluation of this community is required.”</i>	<p>We continue to liaise with the owners and residents of Nine Elms Pier to discuss impacts of the project on their properties, including noise effects and temporary re-housing eligibility.</p> <p>Several meetings have been held with Nine Elms Pier Ltd and with the Nine Elms Pier Residents Association.</p> <p>See p. 9 of the Initial LBW SoCG.</p>
55.	9.2.16	<i>There is no information at this stage as to whether residents of Nine Elms pier would be offered a new mooring, a different boat on a different mooring or residential accommodation. It is difficult, therefore, to determine how reasonable any alternative offer may be in terms of location and quality for those potentially affected.</i>	See response to para. 9.2.15.

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Health			
56.	9.2.17	<i>“Population impact: The site is in an area of high deprivation, a GP within 0.25 of a mile from the site has rates of asthma higher than the Wandsworth average. The cumulative impact of the construction work from multiple sites being developed at the same time is noted as an area that may particularly impact negatively on health. It is queried whether the impact of this construction and the NEV Opportunity Area will have a cumulative affect that is not yet quantified. It is noted that this impact should be mitigated between Thames water and stakeholders to determine an appropriate sequence of works (Para 8.2.2).”</i>	<p>A health impact assessment was undertaken for the project which considered the health effects associated with construction works at each work site and project-wide. Health-related design measures have been developed and incorporated into the project’s design and implementation, to mitigate the potential negative health and wellbeing impacts, are likely to ensure that the significance of the residual negative impacts are avoid or minimised. The assessment findings are contained within the Health Impact Assessment (Doc ref: 7.12). Construction effects of the project and NEV Opportunity area have not been quantified, however, both projects have design measures in place to reduce their impact on health.</p> <p>In order to minimise the impact and coordinate the works, we are participating in the working groups established by the Nine Elms Vauxhall Partnership established by the London Boroughs of Wandsworth and Lambeth to look at synergies and opportunities.</p>
Affordable housing			
57.	9.2.19	<i>“Part of the site used for Thames Water’s construction compound is where a portion of the affordable housing provision is due to be located for the Battersea Power Station planning application which has been approved (2009/3575). The occupation of these BPS sites adds a high degree of risk to the delivery of the affordable housing on the BPS site as these were identified for that land use and the TTT could effectively hold the delivery of this local benefit back to the end of the scheme. If this occurs, and it results in delaying the earliest timing of delivery of</i>	<p>We are in discussions with the Battersea Project Land Company Ltd regarding minimising potential clashes from project occupation of the power station sites. The project have an agreed legally binding Memorandum of Understanding with regard to the phasing of development in Phase 5 and are continuing to discuss a further Agreement relating to the project’s temporary occupation of the Battersea Project Land Company Ltd sites. We are aware of the LBW’s concerns regarding the timely delivery of the affordable housing and the resultant community benefit impacts. As such we are open to entering into constructive dialogue with LB Wandsworth to mitigate the effects of any delay to the occupation of the</p>

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		<i>affordable housing, there is potential incentive to the developer to allow this to happen as it would delay one of their obligations, and subsequently delay one of the main community benefits of the overall Power Station development.”</i>	Battersea Power Station phase 5 affordable housing sites.

Table 1.8 Heathwall Pumping Station matters

Ref	LIR para. ref	London Borough of Wandsworth comment	Our response
10.1 Site related matters			
Relevant Development Plan policies			
58.	10.1.8	<p>Core Strategy: <i>PL1 Attractive and distinctive neighbourhoods and regeneration initiatives PL2 Flood risk PL3 Transport PL4 Open space and the natural environment PL6 Meeting the needs of the local economy PL9 River Thames and the riverside PL11 Nine Elms and the adjoining area in north-east Battersea IS1 Sustainable Development IS2 Sustainable design, low carbon development and renewable energy IS3 Good quality design and townscape IS4 Protecting and enhancing environmental quality IS6 Community services and the provision of infrastructure IS7 Planning Obligations</i></p> <p>Development Management Policies Document: <i>DMS 1 General development principles - Sustainable urban design and the quality of the environment DMS</i></p>	<p>The ExA has advised that policies of a general nature which cover topics already addressed within the NPS are unlikely to be important and relevant. Site allocations and site-specific designations and guidance are more likely to be important and relevant.</p> <p>We have included a list of local policies and designations in Appendix C of the Initial LBW SoCG which are of relevance to the decision making framework set out in Planning Act 2008.</p> <p>Further discussion can take place with LBW under the SoCG regarding the relevant of policies.</p>

Ref	LIR para. ref	London Borough of Wandsworth comment	Our response
		<p>2 Managing the historic environment DMS 3 Sustainable design and low-carbon energy DMS 5 Flood risk management DMS 6 Sustainable Drainage Systems DMT 1 Transport impacts of development DMT 3 Riverside walking and cycling routes DMO 3 Open spaces in new development DMO 4 Nature conservation DMO 6 Riverside development DMO 7 Development in the river and on the foreshore</p> <p>Site Specific Allocations Document:</p> <p>Area Spatial Strategy for Nine Elms Site 2.1.10 Middle Wharf Site 2.1.22 Heathwall Pumping Station</p>	
10.2 Site-specific impacts			
Heritage, design and visual			
59.	10.2.1	<p><i>“The above ground permanent works are largely contained within the Heathwall Pumping Station compound away from public sight. However, two signature ventilation columns of between 4m and 8m in height and one further ventilation column of 6m height would be visible from the outside of the compound and from the potential Thames path. Whilst the layout and materials of the above-ground structures is illustrative and is yet to be confirmed, the location of the ventilation columns could have a negative environmental impact upon the future surrounding residential environment depending on their precise location. Whilst the Council acknowledges the current safeguarded designation of the adjacent wharf, consideration should be given to</i></p>	<p>We have not proposed the detailed design approval requirement as the proposed permanent above ground structures are within the safeguarded wharf.</p> <p>Discussions are being progressed with LBW on this matter through the SoCG.</p> <p>The Site works parameter plan limits the positioning of the permanent above-ground structures on the safeguarded wharf to the western edge. This would protect the wharf’s viability.</p> <p>Residential development on the wharf would be against current development plan policy; however, further discussions could take place through the SoCG.</p>

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		<p><i>the potential future redevelopment of the wharf for residential, mixed use development and the potential impact the above ground works such as the ventilation columns may have on such development. The wharf is currently vacant and the Council has made it known to the Greater London Authority that whilst safeguarding Middle Wharf for a temporary period is preferred during the construction of the proposed Thames Tunnel, its dedesignation afterwards is sought. The release of the safeguarded status of Middle Wharf would allow increased access to the riverside to support the regeneration of the Opportunity Area and would help provide the security of delivery of the proposed riverside walk in the long term."</i></p>	
Transport			
60.	10.2.3	<p><i>"Heathwall Pumping Station and Middle Wharf are located on the A3205 Nine Elms Lane. The A3205 Nine Elms Lane is part of the Transport for London Road Network (TLRN) and as such Transport for London (TfL) are the highway and traffic authority. Access to and from the site is directly onto the TLRN and it is for TfL to comment on the impact of these proposals on their road network. The construction period of this site would take place when there are other major infrastructure and development projects happening within the locality. Construction of the Northern Line Extension is due in 2015 and expected to finish in 2020. A range of major mixed use</i></p>	<p>We continue to discuss our retrospective programmes and works with TfL/Northern Line Extension with a view to mutually agreeing appropriate interfaces.</p> <p>We are reviewing the Shared Jetty Study with TfL/Northern Line Extension and are prepared to discuss options to achieve a way forward that meets the aims of the construction logistics strategy.</p>

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		<p>developments, many of which have had planning approval will be under construction at the same time leading to pressures on the transport network. The Northern Line Extension currently also at Inquiry starting 19th November. The relevant TWAO web page is http://www.tfl.gov.uk/corporate/projectsandschemes/21614.aspx</p> <p><u>“Thames Water will need to work in collaboration with the Council and other stakeholders to determine a sequence of works for agreement. Examples of collaboration could include a shared conveyor for the removal of spoil. The NLE spoil would pass through the south of the site of Battersea Power Station where the proposed tube station would be and both their conveyor and Thames Water conveyor could be making use of barges to ensure spoil is removed from the sites. A Construction Logistics Strategy is being prepared for the Nine Elms Vauxhall Opportunity Area to look at the impact upon the area of the construction traffic from all sites, taking the latest information on the phasing of each separate development site. Thames Water has taken an active role in the development of this Strategy and has shown a willingness to work with the local partners.”</u></p>	
61.	10.2.5	<p><i>“Whilst the Council supports the provision of a riverside walk the width of the path at the pinchpoint between the pumping station and the river is less than the 6m requirement and this is considered to be an issue which is yet to be agreed. The Council would</i></p>	<p>This issue has been discussed with LBW. See p. 85 Initial LBW SoCG. It explains that while where possible part of the path is proposed to be in excess of 6m, due to the constraints of existing buildings, structures and the safeguarded wharf, it is not feasible to</p>

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		<i>prefer a cantilevered approach to the riverside walk at this point so that extra width can be incorporated to accommodate anticipated busy pedestrian and cyclist movements.”</i>	widen the whole length of the path on the land side to 6m. Cantilevering would require a significant structure, which may well require piled supports rather than being able to fully cantilever from the existing river wall. A significant structure of this sort would have environmental impacts and is not considered suitable. It would also interfere with the viability of Middle Wharf as a safeguarded wharf. Discussions have therefore taken place with LBW regarding measures to control the speed of cyclists at the narrower section which could be incorporated through Requirement HEAPS8 which requires LBW to approve landscaping details.
Noise, vibration and odour			
62.	10.2.7	<i>“The planning statements for Kirtling Street and Heathwall pumping station imply that the Riverlight development should have mitigated the potential impacts of the Thames Tunnel (7.01, Appendix J, paragraph J.5.123 and 7.01 Appendix K, paragraph K.5.108). This issue is of concern to the Council as when the Riverlight development was granted planning permission the Thames Tunnel project was in the initial phase of consultation and the details of potential mitigation levels were not available. The Council considers Thames Water should provide adequate mitigation at source to avoid the need to implement noise mitigation through improved sound insulation to dwellings or the extremity of relocating residents.”</i>	See our response to para. 3.1.10 with regards to mitigating noise at source and the comprehensive measures we have identified and incorporated into the CoCP. We continue to liaise with the developers of the Riverlight scheme to discuss impacts of the project on that development. Further studies are being undertaken to determine the suitability and the requirement to provide noise insulation at Riverlight as a result of the scheme. This will be discussed with St James.
Ecology			
63.	10.2.8	<i>“Disturbance from in-river works during construction</i>	The results of the 2011 wintering bird survey and bat survey are

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		<i>(comprising noise, lighting, and vibration) will have a negative impact on biodiversity although the CoCP (a) seeks to minimise or prevent many effects. Measures detailed in the CoCPa seek to prevent use of the site by black redstarts will result in a neutral impact. The impacts upon overwintering birds and foraging bats are inconclusive and therefore have to be treated as a significant negative impact until it can be proved otherwise. There will be a negative effect arising from the permanent loss of foreshore. Overall there will be a significant negative impact on biodiversity at this location.”</i>	presented in the Environmental Statement (Doc ref: 6.2.15, Vol 15 Heathwall Pumping Station, Section 6, paras. 6.4.17 to 20 and 6.4.8 to16), which takes account of mitigation embedded in the CoCP and the design principles and concludes that no significant adverse effects on wintering birds or bats were identified at the Heathwall Pumping Station site.
Health			
64.	10.2.10	<i>“Population impact: Heathwall Pumping Station is an existing Thames Water pumping station site to the North of Kirtling Street. The site is in an area of high deprivation, a GP within 0.25 of a mile from the site has rates of asthma higher than the Wandsworth average. The smoking rate is lower than Wandsworth’s smoking rate. The cumulative impact of the construction work from multiple sites being developed at the same time is noted as an area that may particularly impact negatively on health. It is noted that this impact should be mitigated between Thames water and stakeholders to determine an appropriate sequence of works (Section 8.2.2).”</i>	<p>A health impact assessment was undertaken for the project which considered the health effects associated with construction works at each work site and project-wide.</p> <p>Health-related design measures have been developed and incorporated into the project’s design and implementation, to mitigate the potential negative health and wellbeing impacts, are likely to ensure that the significance of the residual negative impacts are avoid or minimised. The assessment findings are contained within the Health Impact Assessment.</p> <p>In order to minimise the impact and coordinate the works, we are financially and technically participating in the working groups established by the Nine Elms Vauxhall Partnership established by the London Boroughs of Wandsworth and Lambeth to look at synergies and opportunities.</p>

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