Planning and Borough Development
Kensington Town Hall, Hornton Street, LONDON, W8 7NX

Executive Director Planning and Borough Development
Mr Jonathan Bore

THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

Mark Mathews
Town Planning Manager
Thames Water

My reference: **Response to the Counters Creek Storm Relief Sewer Interim Engagement**

Please ask for: Patricia Cuervo

22 June 2015

Dear Mr Matthews,

Please see enclosed the Council's response to the above consultation. I trust that these comments will be given serious consideration.

Please do not hesitate to contact my officer, Patricia Cuervo if you have any queries regarding this matter.

Yours sincerely,

Jonathan Bore
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The Royal Borough of Kensington and Chelsea response to the Counters Creek Storm Relief sewer interim engagement

The Council welcomes the opportunity to comment as part of the interim engagement. The Council's comments are provided without prejudice to further comments on the Phase 2 consultation and without prejudice to any future determination of any associated planning application.

Although an interim consultation is welcomed, the timescales have been very short and residents have raised complaints about the following issues:

- lack of timely information regarding the consultation stakeholder events;
- lack of proper construction layout drawings in display at those events;
- consultation documentation not being available online when the consultation started; the main interim consultation document, which was available, did not include construction site layouts;
- once available, the site suitability reports were not very clear to navigate, with key plans located in appendices of the long reports instead of in the main body of the report;
- mistakes in construction plans keys and inaccurate information (such as location of listed buildings in the site suitability reports for the sites SS233 and SS230) in heritage plans; and
- lack of clarity on what the choice is between sites, i.e. whether the choice is a straightforward 'either/or' site selection, or a more elaborate 'and/and' site selection where choosing one site may still necessitate the need for another site, albeit for different works with differing impacts. For example, the Council only received clarification at a very late stage in the consultation period that should one of the new sites included in our response below be chosen by Thames Water, there may still be a need for significant (albeit reduced) works at the Upper Addison Gardens site (consulted on in Phase 1).

This scheme is very complex and it is important that residents and the public understand clearly the implications of the construction sites. We therefore urge Thames Water to rectify all these issues for Phase 2 consultation and for the planning application stage. Attention to detail is of the utmost importance.

Although the Council's response largely relates to planning issues, the Council would expect Thames Water to reach a satisfactory agreement to compensate those residents severely affected by the project as referred to in the Property Assessment sections of the site suitability reports, separate to any forthcoming planning application.

1. The need for the proposed sewer

1.1. The Royal Borough has suffered a series of flooding events, the most severe in 2007. The main problem comes from the ingress of rainwater into the combined sewer system which is close to capacity. The sewer system is then overwhelmed and discharges sewer water into the lower part of properties (basements or lower ground floors).

1.2. The need for the scheme is not questioned, although, as the scheme will have a considerable impact on our residents during construction, it is very important that it is future proof. Nearby strategic developments in the Counters Creek area such as White City and Old Oak Common should be taken into consideration when calculating the infrastructure needed to address both increased foul flows and surface water runoff. The Council will continue to work closely with Thames Water to ensure that the scheme as a whole have the least impact possible on the Borough's residents and visitors.

1.3. It is understood that Phase 1 consultation responses, changes to the alignment of Crossrail, ongoing review of sites suitability and the need to intercept other sewers have led to a review of the proposed sites. The Council's response below includes comments on the two new sites in the Borough (Addison Crescent and Holland Gardens) and two sites which fall mainly in the London Borough of Hammersmith and Fulham but which will have implications for the Borough (Rifle Place and Edward Woods Town Park and Land at Swanscombe Road and Norland House).

1.4. Cremorne Wharf has been changed from an interception site to a drive site. This could potentially lead to an intensified and longer use of the site, which will need to be thoroughly explained in the Phase 2 consultation. Synergies with the Thames Tideway Tunnel project should be maximised to reduce the impact of both projects.

1.5. The Further Longlist and Shortlist Site Assessment Report states that the (SS221) Holland Park Avenue and A3220 Roundabout site has been rejected mainly due to planned Transport for London projects. However, these planned projects are not explained. Also, the site adjacent to Holland Park roundabout (SS234) has been rejected due to engineering constraints yet, its potential use as a compound has not been investigated. If these sites could be potentially used to alleviate the impact on any of the proposed sites in the Holland Park area, this information should be included in the Phase 2 consultation.

1.6. For the avoidance of doubt, the Council will strongly oppose the use of more than one site in the Holland Park area to minimise disruption to residents. Should the use of more than one site in the area be necessary, the Council will require Thames Water to address the overall cumulative impact in the area and reduce the impact on residents to an acceptable level.

2. New identified sites

2.1 (SS238) Addison Crescent

Site Description and Townscape Impacts

2.1.1 The site lies in the Holland Park Conservation Area. The site is located at the junction of Addison Crescent with Holland Villas Road and Holland Road, although vehicle access onto Holland Road is partly prevented by bollards, permitting pedestrian movement only.

2.1.2 Addison Crescent is a leafy residential street comprising substantial 3-storey detached mid-Victorian villas set within good sized front gardens. Holland Villas Road at its southern end comprises mainly a terrace of 3-storey Neo-Georgian townhouses with integral garages that date from the 1960/70s. The streets are located within the Holland Park Conservation Area, although there are no nearby listed buildings.

2.1.3 The attractive streetscape is finished in high quality York stone paving with granite kerbs and blacktop carriageways, and features an attractive island planter positioned at the apex of the road junction. Traffic movement is two-way, where allowed, and on-street residents' parking is positioned kerbside with yellow line restrictions protecting the bend and integral garages. There are no street trees, the street scene being softened by the central planter and by the extensive planting and tree cover provided within the residential front gardens. The lighting columns are modern black columns with a traditional lantern style that complements the street. The street scene is also notable for the distinctive boundary walls comprising stacked half clay pipes on low plinth walls and by the attractive, curved brick boundary wall to 5 Addison Crescent wall that follows the junction's kerb line.

2.1.4 The proposed site dimensions will range from 1100m^2 to 1550m^2. Construction will last for 18 months. The site works include:

- construction of an 8m diameter and 25m deep drop shaft and a connecting tunnel to connect to the main strategic sewer;
- construction of a weir chamber to intercept the Counters Creek Sewer;
- construction of a connection pipeline;
- installation of odour control system;
- provision of manhole covers and ancillary equipment including a (2x1.5x2m) kiosk and a ventilation column of a minimum of 4m height and a 1.5m diameter.

2.1.5 In the proposals the drop shaft is positioned centrally within the public realm, on the site of the island planter. The above ground structures are a large utility kiosk, measuring 2m x 1.5m and 2m high, and comprising green GRP (glass reinforced plastic); and a single ventilation column, measuring 1.5m diameter and at least 4m in height, although the material finish is not specified. Both structures are placed side-by-side at the back edge of the pavement, outside 5 Addison Crescent. The carbon filter equipment is currently shown sited below ground.

2.1.6 The location of the drop shaft requires the loss of the island structure with its ornamental planting, which currently contributes positively to the street scene, forming an attractive foreground feature to the residential streets and easing the dominance of roadway space. The requirement for service hatches and maintenance access is likely to reduce, if not prevent its full reinstatement, effectively sterilising the space. The rationalisation of the permanent structures including manhole covers is vital.

2.1.7 The kiosk and vent pipe proposed would be substantial structures that will physically and visually obstruct the relatively narrow pavement outside 5 Addison Crescent, but will combine to dominate the street scene and harm views into and within the Conservation Area, particularly given their widely visible location close to the corner apex. The absence of street trees increases the column's visual impact on the townscape. It is acknowledged that the large front gardens with their planting reduce the structures' visibility for the surrounding residential occupiers, although the harmful impact on the public realm and townscape remains significant.

2.1.8 A less sensitive location is advised for the kiosk, as is confirmation that it cannot be accommodated below ground. If it is to remain at ground level, it should be reduced in size and hidden from public view, possibly by placing it within the front garden of 5 Addison Crescent where it could be obscured by the garden wall, although this should be subject to full consultation and agreement of the owners/occupiers. If it is to remain exposed, a smaller, higher quality kiosk design and material finish should be secured.

2.1.9 Similarly, for the ventilation column, a less sensitive location is advised, as is a considerably slimmer structure. A position within Holland Road may be found that could prove less harmful than the current site's residential character.

2.1.10 If Addison Crescent is selected, the reinstatement of the high quality surfacing materials is required. The Site Suitability Report explains (paragraph 4.3.1) that ‘where enhancement of the area is possible, this should be considered’. The Council will expect Thames Water to consider enhancements and to implement them as one way of mitigating the post-construction impacts. Public realm improvements to mitigate and off-set the detrimental impacts should be sought. These could extend to include a streetscape improvement project for the junction, designed to provide a new/ extended low-key public space, featuring planters, some seating and public art. The scheme should be designed to visually 'absorb' the relocated above ground equipment, perhaps with a bespoke column designed as the focal element of public art.

Transport

2.1.11 The site layout would have significant impacts for highway operation. The southern part of Holland Park Villas and the northern arm of Addison Crescent will become dead ends for the duration of the works. The need to provide turning points would mean that large numbers of parking bays would have to be suspended in an area where there are saturated on street parking conditions. Displaced parking demand could not easily be accommodated on nearby streets inconveniencing residents. The Site Suitability report explains that access will be provided to all properties throughout the works (paragraph 5.2.4). Confirmation is needed about the type of access provided.

2.1.12 The construction of the weir chamber within the carriageway at the junction of Holland Road and Addison Crescent (both arms) would result in the A3220 being closed to traffic in a southerly direction. The traffic impacts of the closure of this strategic route are likely to be severe. Should the closure proceed, traffic would have to be diverted impacting significantly on traffic levels on diversionary routes. Transports for London have commented that the closure of the A3220 would not be sustainable. The Council strongly objects to the total closure of this artery which provides southbound access. It is expected that Thames Water undertakes traffic modelling of the impacts. It is probable that this impact could not be satisfactorily mitigated.

2.1.13 Up to 12 lorries (24 movements) would visit the site daily. We will require details of the intended scheduling arrangements. During construction of the weir chamber the pedestrian crossing of Holland Road would be unavailable. Alternative crossing facilities must be provided. The proposed position of the permanent kiosk and ventilation column would occupy much of the available footway impeding pedestrian movement which would be contrary to Policy CT1 (g), (h) of the Core Strategy. The infrastructure would be unduly prominent within the streetscape contrary to Policy CR4.

Noise and Air Quality

2.1.14 The nearest residential receptors are located within 5-10 m of the construction site along Holland Villas Road and Addison Crescent. Some of the additional plant within the site will operate 24 hours a day and it is proposed that some tunnelling will occur on a 24 hour schedule. In this residential area it is a priority that noise and vibration impacts are minimised to an adequate level during construction which could include reconsidering the location of noise generating machinery during construction. Where noise exceeds certain levels, measures such as temporary rehousing and sound insulation should be taken into consideration as it has been in other schemes such as the Thames Tideway Tunnel, although this should be subject to full consultation and agreement of the owners/occupiers.

2.1.15 During the construction period Addison Crescent (southbound, where it branches from Holland Road), would be closed for three months. According to the traffic management appraisal there is expected to be a total peak of approximately 24 lorry movements per day which will also contribute to emissions. The temporary closure of the A3220 at Addison Crescent where it branches from Holland Road will be required. Significant effects on air quality due to increased emissions from queuing/congested traffic conditions are likely.

2.1.16 The site suitability report only considers dust and concludes that the site is less suitable because of the sensitivity of the area to the dust soiling effects from construction, earthworks and track-out. The only comment relating to transport emissions is described under the heading of existing traffic conditions, ‘Additional vehicle emissions have a high potential to interfere with local air quality action plan policies due to current exceedances of the Air Quality Objective in the vicinity of the site’ (Appendix 7, page 16). The report acknowledges that lorry movements could cause localised air quality impacts and that there is a potential for additional exhaust emissions, but it concludes that the impacts are ‘undefined at present’. It does not refer to or consider the air quality impact due to the full or lane closures and the surrounding area due to the emissions from queuing/congested traffic that would be caused from the road narrowing and the additional heavy duty vehicles using the route for the removal of spoil, etc.

Without the assessment described the extent and magnitude of the impact on air quality cannot be assessed, but is essential to enable a determination of the suitability of each site. The site suitability reports do go further than the shortlist assessment, but only provide a high-level qualitative view of air quality impacts where the Council would expect a detailed quantitative assessment without which we cannot provide conclusions on site selection.

2.1.17 While the interim engagement report states that a full environmental assessment would take place before any construction and that the 'assessment would investigate the impacts of our [Thames Water's] proposed work, including a study into proposed traffic movements' (page 21) it is not clear what this would entail. Therefore, detailed modelling of the air quality impacts resulting from the works as a result of the additional traffic movements and lane/road closures will be needed at each of the sites to assess the full impacts on air quality on the affected roads and surrounding areas and to propose mitigation measures.

2.1.18 In addition, all sites require a generator, but no information is provided on how it will be powered. This should be electrically powered to limit the air quality impact.

Land Quality

2.1.19 Contaminated land is not considered in the shortlist assessments at all. The site suitability report refers to desk study information based on limited information not considered adequate to make conclusions on the suitability of the site. In line with prevailing guidance (i.e. CLR11 Model Procedures for the Management of Land Contamination), the Council's planning policies, etc., environmental enquiries should be made to each borough for provision of the Council's local data relevant to the potential contamination of these sites. Councils are required under Part IIA of the Environmental Protection Act 1990 to identify and prioritise potential contaminated land sites. We would expect this information to be included in Thames Water's assessment as a minimum.

2.1.20 Also in line with prevailing guidance a desk study is insufficient to assess the suitability of the site. A preliminary risk assessment would be expected which should include a desk study (updated as per last point) and a site walkover (it does not appear that any site walkovers have taken place). Where possible, site specific information should be attained (i.e. via intrusive site investigation) to determine geology, lithology, the hydrogeological regime and the presence of potential contamination of both the soil and perched groundwater. Desk-based information on this data is not reliable. These results should then be a key consideration in not only site selection, but the design of flood alleviation measures. The relevant environmental searches for the sites can be requested from the Environmental Quality team which can be contacted at environmental.quality@lbhf.gov.uk.

Ecology

2.1.21 This site is a residential area with relatively low ecological value, although the trees are of importance in their own right and together provide good canopy cover. This site would see the loss of a raised highway planter which is of low ecological value. However this would cause a loss of visual amenity. If works were to take place here it would be expected that a planter of similar scale would be provided.

2.1.22 Holland Park is a site of Metropolitan Importance for Nature Conservation. It is situated close to the construction site and has significant wildlife value including a number of rare species. Therefore any impact caused through the construction Phase should be considered fully.

2.1.23 The potential damage to trees mentioned in paragraph 7.9.1 should be avoided if possible or minimised. An ecological inspection of adjacent buildings and trees is recommended to assess bat roost potential, as well as relevant emergence and activity surveys. These should be carried out prior to any commencement of works. The potential for nesting birds should also be addressed.

Water Resources and Flood Risk

2.1.24 The site suitability report explains that there are not anticipated impacts on groundwater. However, this should be carefully monitored. The site lies in the Holland Park Critical Drainage Area, designated in the Surface Water Management Plan because of the interaction of surface and sewer water flooding. Only surface water is highlighted in the report and there is no reference to the interaction with sewer water flooding. It is important that this is taken into consideration when assessing flood risk during construction as any potential flooding may lead to localised land and groundwater contamination. In line with policy CE2, a flood risk assessment is required when submitting a planning application and this should include Sustainable Drainage Systems.

2.2 (SS208) Holland Gardens

Site Description and Townscape Impacts

2.2.1 Holland Gardens is a typical late Victorian residential side street in the Royal Borough that runs east-west, connecting Holland Road and Russell Gardens. Terraces of mainly 4-storey townhouses rise above a semi-basement level line along the main roads and enclose gardens at the rear. As the side street Holland Gardens is characterised by the stock brick and stucco flank elevations of the end of terrace properties and by their intervening gardens, visible above medium height stucco walls, preserving the integrity of the urban form. Parts of the gardens immediately adjacent to the street have been in-filled by 5 garages on the north side and by a large single storey Thames Water utility structure, although extensive tree growth provides some cover. There are no residential entrances onto the street, although side gates accessing the gardens are present. Windows have been inserted into the flank walls of three of the four end of terrace properties, and at all levels, providing improved residential amenity and good informal surveillance of an otherwise quiet side street. Holland Gardens is outside a local Conservation Area, although part of the Holland Park Conservation Area is visible to the east, and there are no nearby listed buildings or structures.

2.2.2 The footpaths on either side are fairly narrow and surfaced mainly in concrete paving with granite kerbstones, and include three street trees on the northern side which, together with the planting of the exposed rear gardens, soften the street scene. Vehicle traffic is one-way westbound, with a counterflow cycle route. On-street residents' and visitors' car parking line both kerbsides.

2.2.3 The proposed site dimensions will range from 800m^2 to 1000m^2. Construction will last for 18 months. The site suitability report explains in paragraph 3.2.2 that it is likely that the site will be demobilised for a period of time. If this site is selected for the Phase 2 consultation the Council requests clarification regarding the amount

of time the site will be demobilised for and what that it will involve in terms of reinstating the site for full use. The site works include:

- construction of an 8m diameter and 25m deep drop shaft and a connecting tunnel to connect to the main strategic sewer;
- construction of a weir chamber to intercept the Counters Creek Sewer;
- construction of a connection pipeline;
- installation of odour control system; and,
- provision of manhole covers and ancillary equipment including a (2x1.5x2m) kiosk and a ventilation column of a minimum of 4m height and a 1.5m diameter.

2.2.4 In the proposals the drop shaft is positioned centrally within the carriageway, midpoint along the street, but is visible as 4 manhole covers. The above ground structures are a large utility kiosk, measuring 2m x 1.5m and 2m high, and comprising green GRP (glass reinforced plastic); and a single ventilation column, measuring 1.5m diameter and at least 4m in height, although the material finish is not specified. The carbon filter equipment is currently sited below ground.

2.2.5 The kiosk is positioned at the back edge of the footway on the north side of the street, adjacent to 85 Holland Road. Here the kiosk will present a substantial and unattractive box that will occupy much of the width of the pavement and rise above the adjacent garden wall. Not only will it present a physical obstruction to pedestrians, but a visual obstruction, blocking views along the pavement. Its size presents an intrusive element within the street scene, with its green and bulky built form detracting from the local townscape and from the view out towards the Holland Park Conservation Area, albeit a view across a busy road. Moreover, the position is immediately adjacent to the rear building line of the property, where it will obscure views of the bay window and quoin details of the rear elevation, and may well detract from the outlook and amenity of the property itself being visible above the boundary wall.

2.2.6 A less sensitive location is advised, as is confirmation that the kiosk cannot be accommodated below ground or within the existing Thames Water pumping station. If it is to remain at ground level, it should be hidden from view by placing it within one of the off-street garages, subject to full consultation and agreement of the owners/occupiers; or possibly within the existing utility structure opposite, subject to the structure's rationalisation. If it is to remain exposed, confirmation is needed that it cannot be reduced in size and a higher quality kiosk design and material finish secured. It should also be noted that the location may impact upon an existing BT cabinet.

2.2.7 A similar response is made to the ventilation column, which at 1.5m diameter will obstruct the southern pavement and sightline, as well as detract from the street scene. It will appear uncharacteristic and distinctly intrusive, being substantially wider in girth and possibly taller than any street tree. Confirmation of its height is important, given its function of odour disposal and the presence of high level openable residential windows and the impacts on amenity that this may have. It is acknowledged that the column is placed close to 35a-d Russell Gardens, which has no flank window openings, although the column is positioned adjacent to the rear building line and close to rear window openings. Furthermore, its position obscures the attractive quoin details, detracting from the building's appearance. Again, a less sensitive location is advised, as is confirmation that the column cannot be slimmer. It should either be placed midpoint along the street and lost within the tree cover of the adjacent gardens, preferably incorporated within the

revised utility structure; or further westwards along the flank wall and away from the building's decorative corner detailing. The material finish should be confirmed and the opportunity sought to secure a more decorative finish.

2.2.8 If Holland Gardens is selected, public realm improvements to mitigate and off-set the detrimental impacts should be sought. These could include pavement widening and the upgrading of surfacing materials subject to Highways approval, and the provision of additional semi-mature/mature tree planting to provide screening.

Transport

2.2.9 Except for the garages there are no street fronting properties on Holland Gardens. Holland Gardens is not an important link on the network and its loss for the period of the works would have no significant impact on local traffic conditions. It is understood that during construction of the weir chamber it will be possible to Phase the works in a way that would maintain vehicular traffic on Holland Road (Red route). If this is the case, traffic impacts may be of an order that can be managed and mitigated. Clarification is sought regarding the amount of time the works will disrupt the full use of Holland Road.

2.2.10 There will be a suspension of 18 parking bays in an area where there are saturated on street parking conditions. Displaced parking demand could not easily be accommodated on nearby streets inconveniencing residents.

2.2.11 Inconvenience to pedestrians would be limited as Russell Gardens and Fairfax Place provide alternative routes to the north and south respectively. Also, the site layout plan will maintain side access to properties in the corners of the street. The proposed position of the permanent kiosk and vent would occupy much of the available footway impeding pedestrian movement contrary to Policy CT1 (g), (h) of the Core Strategy. The infrastructure would be unduly prominent within the streetscape contrary to Policy CR4.

2.2.12 Up to 12 lorries would visit the site daily (24 lorry movements). These would route via Russell Gardens and would reverse into the works compound on Holland Gardens. These movements would need to be very carefully scheduled to ensure that there are no vehicles queuing on the highway. It appears that there is only sufficient room for a single loading location. The Council will require that any loading positions are independently accessible.

Noise and Air Quality

2.2.13 The nearest residential receptors are located within 5-10 m of the construction site. Some of the additional plant within the site will operate 24 hours a day and it is proposed that some tunnelling will occur on a 24 hour schedule. In this residential area it is a priority that noise and vibration impacts are minimised to an adequate level which could include reconsidering the location of noise generating machinery during construction. Where noise exceeds certain levels, measures such as temporary rehousing and sound insulation should be taken into consideration as it has been in other schemes such as the Thames Tideway Tunnel. However, this should be subject to full consultation and agreement of the owners/occupiers.

2.2.14 The Council's comments for Addison Crescent in paragraphs 2.1.16-2.1.18 are also relevant for Holland Gardens. The partial closure of the A3220 Holland Road will be required. The site suitability report only considers dust. However, any

partial /full closures of this route are likely to have significant effects on air quality due to increased emissions from queuing/congested traffic conditions in the immediate and surrounding area. Furthermore, 24 lorry movements are expected per day, which will also contribute to emissions. These issues should all be taken into consideration when modelling impacts on air quality and proposing mitigation measures.

Land Quality

2.2.15 As with Addison Crescent, contaminated land is not considered in the shortlist assessments at all. The site suitability report refers to desk study information based on limited information which is not considered adequate to make conclusions on the suitability of the site. In line with prevailing guidance (i.e. CLR11 Model Procedures for the Management of Land Contamination), the Council's planning policies, etc., environmental enquiries should be made to each borough for provision of the Council's local data relevant to the potential contamination of these sites. Councils are required under Part IIA of the Environmental Protection Act 1990 to identify and prioritise potential contaminated land sites. We would expect this information is included in the assessment as a minimum.

Ecology

2.2.16 This site is a residential area with relatively low ecological value. However, due to the nature of the gardens of the properties along Russell Road and Holland Road which back on to each other they create an important wildlife corridor including mature trees providing canopy cover up to Fairfax Place. This creates a good habitat for bats and breeding birds. Surveys assessing the presence or absence of bats and breeding birds should be carried out prior to any works commencing to fully assess any impact the works would have.

2.2.17 Holland Park is a site of Metropolitan Importance for Nature Conservation which has significant wildlife value including a number rare species. The construction site is in close proximity and therefore any impact caused through the construction Phase should be fully considered.

2.2.18 The report is vague about the loss of trees (paragraph 6.3.7). If street trees need to be removed during construction, new trees should be provided afterwards to complement existing or create new, high quality green areas which deliver amenity and biodiversity benefits in line with Policy CR6. As stated in the report, an ecological inspection of adjacent buildings and trees is recommended to assess bat roost potential, as well as relevant emergence and activity surveys be carried out prior to any commencement of works and potential for nesting birds

Water Resources and Flood Risk

2.2.19 The site suitability report explains that there are not anticipated impacts on groundwater. However, the weir chamber, connecting pipeline and odour control system excavations will be constructed within the upper aquifer. It is important that measures are in place to reduce any potential impacts.

2.2.20 The site lies in the Holland Park Critical Drainage Area, designated in the Surface Water Management Plan because of the interaction of surface and sewer water flooding. Only surface water is highlighted in the report and there is not reference to the interaction with sewer water flooding. It is important that this is taken into consideration when assessing flood risk during construction as any potential flooding may lead to localised land and groundwater contamination. In line with

Policy CE2, a flood risk assessment is required when submitting a planning application and should include Sustainable Drainage Systems.

2.3 Sites which sit mainly in the London Borough of Hammersmith and Fulham: (SS233) Rifle Place and Edward Woods Town Park and (SS230) Land at Swanscombe Road and Norland House

2.3.1 The dimensions of both sites are similar ranging from 3600m^2 to about 4000m^2. Construction will last for 24-30 months. Most of the construction site layout and infrastructure will be accommodated within the London Borough of Hammersmith and Fulham. However, a weir chamber needs to be located in St Ann's Road to intercept the Counters Creek main line sewer. The main issues for these sites are the disruption to St Ann's Road traffic during the construction period and the impact that this will have on the Borough's residents. However, it is acknowledged that a proportion of the Borough's residents and business will also suffer from other important construction impacts such as noise, vibration and dust generation.

Impacts

2.3.2 Access to the sites will be required from residential areas at St Ann's Road. Most of the works would be positioned off the highway limiting the traffic impact of the works. There would be up to 34 lorry visits to site every day (68 lorry movements). The Council will need to be satisfied that there would be capacity within the site for lorries to wait. Queuing on the highway will not be permitted.

2.3.3 The construction of the weir chamber on St. Ann's Road could have significant traffic impacts. It is unclear from the submission whether it will be possible to keep St. Ann's Road open or not. If not, there would be significant impacts on bus users. St. Ann's Road is an important bus route. Diversionary routes would experience increases in traffic volumes. The adjacent zebra crossing would be closed. Alternative facilities should be provided.

2.3.4 For the northernmost site (SS233) the loss of the bicycle docking station for the duration of the works will require mitigation. The station must be reinstated following the works.

2.3.5 Air quality impact should consider dust generation from the full or lane closure on St Ann's Road and the surrounding area and the additional heavy duty vehicles using the route. Mitigation proposals should be put forward by Thames Water.

2.3.6 The site suitability reports fail to identify that the North Kensington Critical Drainage Area is located in the area and runs up to the junction of St Ann's Road and Wilsham Street. Therefore, the interaction of surface and sewer water flooding should be addressed in a flood risk assessment if the Rifle Place and Edward Woods Town Park site is brought forward to the Phase 2 consultation and the planning application stage.

3 Issues common to all sites

Planning Policies

3.1 The Site Suitability Report mentions the Borough's Core Strategy policies but Supplementary Planning Documents (SPDs) have not been included. The relevant SPDs should be considered: Noise; Transport; Air Quality; Trees and Development; Access; and Planning Obligations.

3.2 In terms of the RBKC UDP's policies[1] (LR24 / LR27) and Policy CE 4[2] of the Core Strategy, ecological enhancement features must be incorporated into the design with an aim of generating a net biodiversity gain on the site and incorporate features to extend or link to Green Corridors and the Blue Ribbon Network.

Further assessments

Equality Impact Assessment

3.3 An Equality Impact Assessment should be carried out by Thames Water for the Phase 2 consultation. This is required to ascertain the impact the projects would have on residents and people working and living nearby (i.e. noise, safety, accessibility etc.).

Cumulative impact with other developments

3.4 Apart from taking into account other consented developments such as Crossrail; Earl's Court; Kensington Olympia; Thames Tideway Tunnel, other developments and proposals in the Counters Creek area should be taken into consideration when assessing cumulative impact.

Other issues

Utility Diversion Works

3.5 The consultation documents refer to utility diversion works which will be carried out by the relevant utility providers before construction starts. These works have not been factored into the overall programme. The Council would like to understand the duration and level of disruption of these works and therefore requests further information be included in the Phase 2 consultation documentation.

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[1] LR24: To identify and protect Sites of Nature Conservation Importance and Green Corridors.
LR27: To encourage the allocation of pockets of land for nature conservation and the planting of native species in landscaping on appropriate development sites.

[2] The Council will protect the biodiversity in, and adjacent to, the Borough's Sites of Nature
Conservation Importance and require opportunities to be taken to enhance and attract biodiversity. To deliver this the Council will:

a) Protect Sites of Nature Conservation Importance and/or require the provision of significantly improved habitats to attract biodiversity in accordance with the national, regional and local Biodiversity Action Plans;
b) Protect the biodiversity value of Green Corridors and the Blue Ribbon Network and require that development proposals create opportunities to extend or link Green Corridors and the Blue Ribbon Network;
c) Require a site specific Ecological Impact Assessment for all major developments in or adjacent to Sites of Nature Conservation Importance, Green Corridors, open space and the Blue Ribbon Network;
d) Require other development proposals to create opportunities, where possible, for attracting biodiversity and habitat creation, having regard to the national, regional and local Biodiversity Action Plans.

Local Sewer Improvements

3.6 Local sewer improvements are referred to in the consultation document under the section: 'What we're doing to reduce sewer flooding'. It is understood that these works will depend on the final route chosen. Depending on the location of the works, they may need to be included in the planning application and be subjected to an Environmental Impact Assessment.

Communication

3.7 A communication strategy is mentioned in paragraph 8.3.2 of the Site Suitability Reports. The Council will like to review this document and provide relevant comments. The Upper Addison Gardens Residents Association should be included in the list of residents associations.

3.8 The project programme in the site suitability reports should be revised to reflect accurate consultation dates for the Phase 2 consultation and planning application submission.