

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**

Richard Aylard
External Affairs and Sustainability Director
London Tideway Tunnels
The Point (7th floor),
37 North Wharf Road
Paddington, London, W2 1AF

My reference: **Response to the Thames Tideway
Tunnel Section 48 Publicity**

Please ask for: Patricia Cuervo

4 October 2012

Dear Mr Aylard,

Please see enclosed the Council's draft response to the above consultation. Please note that this response is undergoing a Key Decision process which requires public consultation. This response will be confirmed formally later this month, but given the closing date of your consultation, a draft response is enclosed.

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

Yours sincerely,

Jonathan Bore
Executive Director Planning and Borough Development

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The Royal Borough of Kensington and Chelsea response Thames Tunnel Section 48 Publicity

1. Introduction

- 1.1. The Council reiterates its concerns about this scheme and the impact it will have. Its growing cost will increase Londoners' water bill up to £70-80 a year. The Council wishes to make clear that the delay or abandonment of other badly needed projects will be unacceptable.
- 1.2. The Royal Borough's response to Section 48 Publicity is primarily focused on the changes to our sites (Cremorne Wharf and Chelsea Embankment Foreshore). Those changes are mainly in relation to the site boundary and transport.
- 1.3. The Council will continue to work with Thames Water before their submission of the Development Control Order (DCO) to the Planning Inspectorate to ensure the mitigation of any negative impacts in any of our sites. Our comments to each document are included below.

2. Book of Plans: Cremorne Wharf

2.1 Changes

- 2.1.1 The plans show that the site boundary has been extended into Lots Road to provide junction improvements. The boundary has also been extended into the River Thames to facilitate river transport.
- 2.1.2 The modification of the site boundary into the river to allow barge transport is both welcome and expected given the fact that this is a 'Safeguarded Wharf' with direct river access. The use of the river will have a positive impact on the reduction of road transport in a heavily congested residential area. It will also have a positive effect on the local air quality and the general amenity of the area. However, justification is required for the extension of the site on to the highway at Lots Road. Whilst it is assumed that this is for junction improvements, the reason is not clear.
- 2.1.3 The inclusion of the pier/jetty within the extension to the boundary is justifiable as it may be required for river transport. However, the Council would remind Thames Water that the jetty is an integral component of the 'Safeguarded Wharf' designation and therefore it needs to be maintained to a high standard.
- 2.1.4 The Council understands that the use of the river may further disrupt activities at the Cremorne Riverside Activity Centre. Although the use of the river for transport is welcome, we have raised our concerns about the disruption to this centre in the response to Phase 2 consultation. The Council considers paramount that Thames Water provides alternative facilities as was promised as part of the Phase 2 consultation.
- 2.1.5 The ventilation column has been relocated closer to the river and away from the proposed residential units on the Lots Road Power Station and the Lots Road Pumping Station which is welcomed. Also, the proposed replacement depot building design will be revised to set the structure back from the western elevation of the Pumping Station to protect the views of the building and its setting as requested in Phase 2 consultation.

2.2 Heritage and Design Considerations

2.2.1 The Council notes that an interception site is proposed for Chelsea Wharf Depot in Lots Road, intercepting the Counters Creek sewer at its discharge point beneath the depot's unused jetty.

2.2.2 The proposal is extensively subterranean, but will require some new infrastructure above ground, comprising access hatches for tunnel maintenance, electrical and hydraulic equipment and ventilation columns. The new equipment is housed within a replacement waste depot building adjacent to the Lots Road Pumping Station. Two 5m high ventilation columns are the most conspicuous features of the new super-sewer system. They are positioned in the southwest corner of the depot site, away from the riverside. Material details of the columns have yet to be confirmed, although it is understood that Thames Water wishes to make a signature structure of them, providing a common distinctive feature across all super-sewer sites along the Thames.

2.2.3 The tunnelling works requires the demolition of the existing depot and temporary use of the site. Following completion of the tunnelling works, Thames Water propose to provide a replacement depot building, but has only submitted information on its maximum footprint and height of its apex roof.

2.2.4 The relevant Core Strategy policies for considering the proposals are:

- CL1(a, d) – architecture and urban design, riverside development;
- CL2(a) – high design quality;
- CL4(g) – setting of a listed building/structure;
- CR4(d, h) – street furniture and public art;
- CR5(b, h) – protected open space, public access to the Thames;
- Saved UDP Policy CD1 – riverside views and vistas;
- Saved UDP Policy CD63 - conservation area setting;
- CT1(a) – riverside development; and
- Conservation Area Proposal Statement (CAPS) for Thames (21)

2.2.5 The current approach is for a scaled down, onshore facility that has been accommodated below ground as far as possible. This is welcomed. The revised scheme plays down the visual presence of the super-sewer system, locating the majority of the control equipment within the pumping station where it is unseen by the public and secure. The main visible presence is a pair of ventilation columns, the location for which is shown on the document for approval as anywhere within the site, but in the illustrative information are shown positioned riverside, aligned with the replacement depot close to the site's western boundary wall. In this position the columns will not be seen from Lots Road, but will be visible to the public as-and-when the Thames pathway is provided.

2.2.6 The minimal, low-key design approach of the new infrastructure is supported. It reduces the visual impact upon the townscape and setting of the adjacent pumping station. As proposed there is little visual impact on the Thames Conservation Area other than the new vent columns. At 0.9m diameter and up to 8m in height the vents are large and visually prominent structures, although this would be less problematic were they to be of high quality materials and design. A location away from the riverside and close to the pumping station is discouraged, as the vents have no functional relationship with the listed building and could clutter its appearance. The illustrative location closer to the riverside is preferred, as is the notion of the columns as signature structures for the Thames Tunnel

project that could feature with the other sites along the river and contribute to the Thames-side experience.

- 2.2.7 The location of the electrical and control equipment within the listed pumping station is supported, being functionally appropriate for the building and reducing the problems of external public realm clutter. However, the exact location and equipment details are not provided at this stage, although informal discussions suggest that these matters could be addressed without harm to the building's special architectural and historic interest. Whilst the proposals include the use of an existing ventilation chamber and column, the latter remains encased within a concrete box that runs the height of the pumping station and detracts from its appearance. In addition, a new control pillar is located adjacent to the column. The scheme architects are encouraged to remove the concrete box and reinstate a cast iron pipe that would be more compatible with the historic building.
- 2.2.8 No information is provided regarding the resurfacing of the access roads and footpaths, which should be of a quality commensurate with the final use of the site, including any public realm and the Thames-side path. Surface level ventilation ducts should be avoided or minimised/located away from the public realm, and hatches to any new chambers should be dressed to coordinate with the surface finish.
- 2.2.9 Regarding the replacement depot building, little information is provided other than the footprint and overall building height. The revised footprint is welcome, which retains the depot as a detached structure, sets back the new flank elevations so as not to challenge the adjacent pumping station, and allows for the future provision of a new public footpath along the riverside. The building's overall height is marginally taller than the current depot, although this is not problematic given the revised footprint and height of the pumping station. The position and general envelope of the proposal is supported, further details are required to assess its detailed bulk, architectural appearance, material quality and urban design to confirm that the new building does not disrupt the setting of the listed building and to ensure that it makes a positive improvement to the character and appearance of the riverside and Thames Conservation Area.
- 2.2.10 The existing jetty remains untouched by the proposals, although the connection tunnel runs underneath and barges for removing the spoil will anchor close to the structure. The opportunity should be taken to upgrade the structure, particularly were it to be damaged during construction work.
- 2.2.11 There are operational requirements that largely determine the scale and position of the new infrastructure and especially that required above ground. It is welcomed that the scheme architects have sought to minimise the visual impact of the infrastructure in terms of the location and visual quality of the above ground infrastructure. Further effort to ensure a high quality, bespoke design of the ventilation columns is strongly encouraged, being in line with Policies CL1, CL2 and CR4. On this basis, the new structures do not impact upon the visual quality of the open space, setting of the listed building and conservation area in general, in line with Policies CD1, CL4 and CD63.
- 2.2.12 Regarding the new depot, the revised footprint and similar height maintain the setting of the adjacent listed building, although detailed designs matters remain outstanding to ensure the building fully accords with Policies CL1, CL2, CL4,

CR5, CD1 and CD63. The set-back allowing the new riverside walk is especially welcome, according with Policies CR5 and CT1.

2.3 Air Quality and odour

2.3.1 The reduction in lorry movements as set out in the Transport Strategy is a positive development. The Section 48: Project Description and environmental information report (PDEIR) states that the overall effect on air quality from construction road traffic, river barges and construction plant is likely to be moderate to minor adverse. However, as stated in the response to the Phase 2 consultation, the Council has not reviewed the air quality modelling undertaken so it is not possible to comment on whether we agree with these conclusions.

2.3.2 In paragraphs 4.5.20-22 of the Phase 2 consultation, the development was classified as a medium risk site with regard to dust potential; this is not mentioned in paragraph 11.3.4 of the PDEIR. However, it does state that there are likely to be a minor adverse effect in the immediate vicinity through implementation of measures contained in the Code of Construction Practice. The mitigation measures have not been included in any detail for this specific site and therefore it is not possible to offer an opinion as to whether this is likely to be the case. The Council would like the mitigation measures to reduce particulates as much as possible. Due to the close proximity of residential properties, and the demolition and construction works that will be required at this site, the Council will seek real time particulate monitoring whilst works are occurring.

2.3.3 The effects of odour released from the ventilation column, during tunnel operation are predicted to be negligible and mitigation is not required. Detailed results of the odour risk assessment have not yet been presented to local authorities, which will presumably form part of the Environmental Statement. The Council will therefore wait until the results are published before making further comments.

2.4 Land Quality

2.4.1 Paragraph 11.3.20 of the PDEIR confirms that ground investigations have recorded contamination of soils and groundwater at the site. Desk based surveys have identified a medium/high risk from unexploded ordnance. The report continues by stating there may be a short term, slight adverse effect on construction workers and a negligible effect on future users and the built environment and no mitigation is required. The Council has not yet had the opportunity to review these investigations (as stated in our response to the Phase 2 consultation) so cannot say whether it supports these conclusions.

2.5 Noise and Vibration

2.5.1 The Council has no additional comments further to those made in response to the Phase 2 Consultation. Amongst other issues raised, clarification is still sought from Thames Water that residents will not be affected by ground borne noise from the tunnel boring machine. It is understood that this will be clarified in the Environmental Statement when it is submitted.

2.5.2 Before works start, the contractor will be required to submit an application for a s61 Prior Consent for each site. The Council will then work with Thames Water to agree this and the conditions to be attached to the notice which will control noise and vibration at the site.

2.6 Ecology

2.6.1 Whereas the Council welcomes the improvements that the green roof will provide, it would also like biodiversity enhancements to be fitted to the river wall along the Chelsea Wharf (from Chelsea Creek to the Chelsea yacht and boat club), thus enhancing the flora and fauna of the intertidal habitat and providing refuge for juvenile fish. Given the impact on the foreshore, fish movement and the river bed, river wall enhancements (i.e. addition of fenders / other structures to allow plants to establish) could reduce this impact. The Council understands that this is dependent on the Environment Agency allowing such enhancements.

2.7 Socio-economic impacts

2.7.1 The Council would welcome clarification as to whether the introduction of barges to transport construction materials might create local employment opportunities or what local opportunities there might be.

2.7.2 As previously mentioned, the Council understands that the use of the river may disrupt activities at the Cremorne Riverside Activity Centre and therefore we require clarification on this point. If activities are disrupted, the Council would wish to know what mitigation measures are proposed.

3. Book of Plans: Chelsea Embankment Foreshore

3.1 Changes

3.1.1 After the Phase 2 consultation it was decided that the Ranelagh Gardens site (for Chelsea Embankment) should be abandoned due to engineering construction risks associated with constructing connection tunnels in the Lambeth Group so making it necessary for the shortest possible connection tunnel. This could only be possible if the site was in the foreshore.

3.1.2 The targeted consultation which Thames Water undertook over the summer showed an extended boundary to the Chelsea Embankment Foreshore in order to connect both sites (the foreshore site and the connection to the Low Level Sewer). The Council agreed that the extended area will provide additional flexibility and had no comment with regard to the proposed modification.

3.1.3 Thames Water states in Appendix A of the Pre-application publicity report that they intend to revise the design of the proposed foreshore structure including changes to the roundabout kerb layout in the bull ring, relocation of kiosks and pedestrian refuge, designing ventilation columns as public art and incorporating interpretative visual material. The Council will continue to discuss design issues with Thames Water to ensure the final outcome is to the highest possible standard.

3.1.4 The Council also notes that Thames Water intends to revise their transport strategy to enable the use of river transport and reduce the number of lorries on the road network, which we welcome.

3.2 Heritage and Design considerations

3.2.1 An interception site is proposed along the Chelsea Embankment foreshore intercepting the Ranelagh combined sewer overflow at its discharge point close to the Bull Ring Gates of the Royal Hospital Chelsea.

3.2.2. The proposal is extensively subterranean, but positioned within a proposed extension of the embankment into the river foreshore, constructed using a cofferdam. It does, however, require some new infrastructure above ground, comprising access hatches for tunnel maintenance, electrical and hydraulic equipment and ventilation columns. The foreshore extension as shown for approval involves the removal of a street tree and 3 ornamental street lamps; the relocation of the embankment wall; new landscaped open space at street level and at inter-tidal level; and two 5m ventilation columns are located to the western edge of the extension and a 6m column to the east. Material details of the columns have yet to be confirmed, although it is understood that Thames Water wishes to make a signature structure of them, providing a common distinctive feature across all super-sewer sites along the Thames.

3.2.3 The proposals include the resurfacing of the Bull Ring. The new design is conceived as a large oval arranged on a northwest-southeast axis, following the line of Monument Walk and the historic axis that runs through the Royal Chelsea Hospital and Royal Avenue beyond. The oval is bisected by the Chelsea Embankment highway. The oval is surfaced in coloured granite setts in an organic pattern. Large, curved stone benches provide seating adjacent to the new river wall. A stone inlay marks the historic axis. The inter-tidal terrace is extensively planted.

3.2.4 An additional area of works is proposed on the north side of the Embankment, which partly falls within Ranelagh Gardens. Thames Water proposes to excavate the site, install an overflow weir chamber and re-cover, reinstating the walls and railings to match the existing and provide replacement tree cover. A new access gate for the utility services is also provided.

3.2.5 The relevant Core Strategy policies for considering the proposals are:

- CL1(a, d) – architecture and urban design, riverside development
- CL2(a) – high design quality
- CL4(g) – setting of a listed building/structure
- CR4(d, h) – street furniture and public art
- CR5(b, h) – protected open space, public access to the Thames
- CT1(a) – riverside development
- Saved UDP Policy CD1 – riverside views and vistas
- Saved UDP Policy CD8 - Royal Hospital views and vistas
- Saved UDP Policy CD9 – Royal Hospital open space
- Saved UDP Policy CD63 - conservation area setting, and
- CAPS for Royal Hospital (20) and Thames (21)

3.2.6 The site is highly prominent being midway along a stretch of riverside that is characterised by a continuous embankment wall and unbroken foreshore and general backdrop of trees and historic buildings, and sitting in the foreground of the Grade I listed Royal Hospital, Grade II listed Bull Ring gates and registered gardens. Views are obtained from the Embankment, Chelsea Bridge and Battersea Park opposite. These views are highlighted as important in the Thames CAPs. Although a listed structure for much of its length, the embankment wall is not listed immediately opposite the Bull Ring, having been rebuilt at the time of the construction of Chelsea Bridge.

- 3.2.7 The current proposals are a welcome change from the earlier proposals, having scaled back considerably the infrastructure requirements for this visually sensitive site. Nevertheless, it presents a disruption to the long linearity of the embankment and a visual intrusion. This has to be weighed against the provision of new publicly accessible open space. Thames Water has opted to make a bold intervention in terms of aligning the disruption with the axis running through the layout of the Royal Hospital, which could prove effective and provide an attractive new public open space from which to enjoy local views, subject to the design quality and maintenance of the new public open space.
- 3.2.8 The current proposals for approval offer little detail beyond setting out the extent of river wall demolition, storage and reinstatement; removal of existing street trees and lighting columns; the extent of the foreshore extension; areas for unspecified landscaping; the inter-tidal terrace; zones for new equipment and ventilation columns, and their maximum heights. Given the sensitive foreshore location and setting of the Royal Hospital and registered gardens, and the disruption of the riverside wall with its distinctive linearity, the scheme's acceptability in principle is highly dependent upon the high quality of design and materials of the public realm.
- 3.2.9 Information on the replacement and extended open space are illustrative at this stage. However, they currently indicate a simple, hard landscaped area with bench seating, detailed in high quality granite sets in something of a floral pattern. The designs draw in the attractive listed Bull Ring gates opposite and celebrate the axial alignment of the open space in a low-key way. There is a concern, however, that the new space remains uneventful rather than understated, lacking a sense of focus within the space itself. The calmness is undermined by the clutter of the very large equipment cabinets located to either side of the axis, the two large vent columns to the west and the single tall vent pipe to the east that detract from the visual quality of the new streetscape. The cabinets should be further minimised in their visual impact. Reviewing the equipment needs or relocating the cabinets below ground should be seriously considered. Whilst it is acknowledged that the proposed cabinets will be clad in stone which may help matters, the success of this will still be subject to the detailed and overall design. The notion of the columns as the project's signature structure is strongly supported and Thames Water is encouraged to recast the structures as public art or incorporating public art, reducing their negative visual impact, perhaps providing the needed focus to the space. Information is also required regarding replacement/new lighting and other street furniture.
- 3.2.10 Currently the material quality of the new paving is high and the resurfacing of the Bull Ring to match is a welcome improvement. The use of granite setts is a key feature of the designs and must be retained in subsequent design stages to ensure the scheme's high quality. The unit size, colour and patterned layout need finessing. However, it is very disappointing that the adjacent footpaths are proposed to be resurfaced in concrete paving as existing and not upgraded to York Stone to complement the material quality of the new space, particularly around the entrance to the Royal Hospital Gardens. Information is needed on the design of the new side gates for the utility services entrance to ensure it complements the garden wall.
- 3.2.11 Regarding the reed beds, they provide added visual interest and a softening of the incursion into the river at low-tide, although the contribution is limited. The positive visual effect, however, should not be undermined by any accumulation of

flotsam and rubbish dumping. Regular maintenance must be secured, if the visual quality of the terraces is to be maintained. The design and location of the access ladders needs to be clarified to minimise any visual clutter.

3.2.12 It is acknowledged that there are operational requirements that largely determine the scale and position of the new infrastructure and especially that required above ground. It is welcomed that the scheme architects have sought to design a new public open space that is low-key and celebrates the axial alignment of the Royal Hospital and its gardens, although this must be weighed against the disruption to the characteristic linearity of the embankment wall and foreshore. The quality and future maintenance of the new public open space is very important in assessing this balance, and as currently shown requires further details if a positive outcome is to be ensured in line with Policies CL1, CL2, CR4, CD1, CD8, CD9 and CD63.

3.3 Air quality and odour

3.3.1 The Council welcomes the reduction in lorry movements as set out in the Transport Strategy. The PDEIR states that the overall effect on air quality from construction road traffic, river barges and construction plant is likely to be negligible at all receptors. However, as stated in the response to the Phase 2 consultation, the Council has not reviewed the air quality modelling undertaken so it is not possible to comment on whether we agree with these conclusions.

3.3.2 In paragraphs 4.5.20 of the Phase 2 consultation, the development was classified as a medium risk site with regard to dust potential, which would be reduced to minor adverse through mitigation measures set out in the Code of Construction Practice; this is not mentioned in paragraph 12.3.4 of the PDEIR. In this document, it states that construction dust is likely to have a negligible impact at all locations. The reduction in impact is likely to be the result of changes made to the proposals at this site. However, the Council has not yet been able to review the assessment carried out it is not possible to offer an opinion on whether this is the case.

3.3.3 The effects of odour released from the ventilation column, during tunnel operation are predicted to be negligible and mitigation is not required. Detailed results of the odour risk assessment have not yet to be presented to local authorities, which will presumably form part of the Environmental Statement. The Council will therefore wait until the results are made available before making further comments.

3.4 Land Quality

3.4.1 Paragraph 12.3.25 of the PDEIR confirms that previous ground investigations close to the site have not recorded any significant contamination of soils or groundwater. However, further ground investigations will be undertaken in due course. Desk based surveys have identified a medium/high risk from unexploded ordnance.

3.4.2 The report identifies that there might be a short term, slight adverse effect on construction workers and a negligible effect on future users and the built environment; on this basis, no mitigation is required. The Council would welcome the opportunity to comment on the methodology proposed for the ground investigations. The Council will review the results once available and only then will be able to confirm whether it supports these conclusions.

3.5 Noise and Vibration

- 3.5.1 The Council has no additional comments further to those made in response to the Phase 2 Consultation. Amongst other issues raised, clarification is still sought from Thames Water that residents will not be affected by ground borne noise from the tunnel boring machine. The Council understands this will be clarified in the Environmental Statement when it is submitted.
- 3.5.2 Before works start, the contractor will be required to submit an application for a s61 Prior Consent for each site. The Council will then work with Thames Water to agree this and the conditions to be attached to the notice which will control noise and vibration at the site.

3.6 Ecology

- 3.6.1 The Council needs to understand what would happen in Ranelagh Gardens regarding the connection to existing Low Level Sewer No1, as some trees are shown as 'to be removed' and other trees next to them are shown as 'to be pruned'. Clarification is sought about if the trees to be pruned are also likely to be removed (which will depend on the damage to their roots, the depth of the dig, etc...).
- 3.6.2 The Council's requirements relating to trees and development are guided by BS 5837: 2012 'Trees in relation to design, demolition and construction – Recommendations' when considering the impact on trees. Particular attention should be paid to sections 4, 5 and 6 of this BS document and the relevant documentation should be submitted with the application. The Council's adopted SPD on trees should also be referred to.
- 3.6.3 The plans included need to be accompanied by a tree survey in line with BS5837 2012 standards and a tree protection plan. Both the PLA and TfL should also be consulted.

4. Code of Construction Practice (CoCP)

- 4.1 The Council notes that the CoCP has moved forward a long way since the last consultation. The updated document has addressed most of our concerns (letter sent in October 2010 and Phase 2 consultation).
- 4.2 The inclusion of a specific section on communication and community stakeholder liaison (section 3) is welcomed.
- 4.3 Section 10 (Waste management and resource use) does not include any reference to sustainable transport. The Council would like reassurance that this will be included in further iterations of the CoCP as explained in the accompanying tracker document.
- 4.4 River Transport not included in Part B of the CoCP. This is something we would like Thames Water to mention not just in the Transport Strategy but also in the CoCP.

5. Section 48 Pre-application publicity report

- 5.1 This report gives an overview of the documents, maps and plans publicised. It explains matters for inclusion in the proposed application and outlines the next steps in the process. The Council has the following comments.
- 5.2 Paragraph 4.2.2 explains that for each site Thames Water will define parameters for zones within which the works will be carried out and limits of deviation within which the tunnel will be built. This will allow flexibility to the contractors. Whereas certain degree of flexibility is needed, this should not mean allowing contractors to decide critical issues which could lead to negative impacts on our residents.
- 5.3 The Council is concerned that section 5 'Next Steps' explains that a large amount of information has not been included in the Code of Construction Practice (including a Flood Risk Assessment) which will give us less time to consider future information and respond before the submission of the DCO

6. Project description & environmental information report

- 6.1 This report gives a description of the project and the activities that will take place during the construction and operational phases and the environmental effects. The Council notes that the report is not an Environmental Statement for the purposes of the EIA regulations and that the information in the Preliminary Environmental Information Report (PEIR) included in Phase 2 consultation has not been updated. We therefore wish to reiterate the comments we had for the PEIR as part of Phase 2 consultation response.
- 6.2 Section 2.10 (Water resources – flood risk) explains that the foreshore sites would provide an equivalent level of flood defence to the existing situation and the provision for the defences to be raised in the future if required. This is important as the new defences must meet the Thames 2100 requirements. The mix of attenuation techniques proposed to address surface water runoff is welcomed.

7. Proposed schedule of works and Section 48 Notice of application

- 7.1 These documents describe the works comprising a nationally significant infrastructure project and associated development and the associated notice publicising the proposed application for a DCO. The Council notes the contents of those documents and does not have any comments.

8. Transport Strategy

- 8.1 The transport comments focus on the changes. Most of the Council's earlier comments remain relevant and will be incorporated into our comments on the Development Control Order when it is made.
- 8.2 The essence of the proposals within the Royal Borough has not changed. There would be two interception sites in the Royal Borough, one at Cremorne Wharf Depot, the other at Chelsea Embankment, where the outflow of existing sewers would be captured and channelled into the Thames Tunnel under the Thames.
- 8.3 Previously the Council objected to the failure to use river transport (barges) to transport materials. Thames Water has reviewed their plans and now proposes that the excavated spoil from both sites would be removed by barge. Incoming

materials including ready mix concrete would continue to arrive by road. It is noted that the change is not fully reflected in all documentation including the Code of Construction Practice (Part B).

- 8.4 Over the full development period of three to four years, a total of 3341 HGVs are expected to visit Cremorne Wharf, or 12 a day during busy periods. At Chelsea Embankment a total of 5595 HGV visits are expected, peaking at 45 daily when the temporary foreshore is under construction. As spoil is now to be removed by barge the anticipated HGV volumes at Cremorne Wharf and Chelsea Embankment have fallen by 22% and 33% respectively. This is a significant improvement that must be fully secured.
- 8.5 A notable change has been introduced to the plans for the Cremore Wharf site. It is proposed to temporarily stop up/ hoard off part of the southern footway on Lots Road at the site entrance. This is unnecessary and unacceptable. Pedestrian passage along the footway must be maintained at all times, save for any required crossover work. The site already accepts HGVs so it is not clear whether any such work would be required. Pedestrian safety at the site entrance can be ensured by requiring a banksman to be present for the duration of the works.
- 8.6 At Chelsea Embankment, the design of proposed permanent hard landscaping needs to be clarified to ensure that a good quality, even and consistent surface is provided for pedestrians.
- 8.7 Thames Water has agreed that the riverside footway on Chelsea Embankment should normally remain open at weekends. At other times, a new signalised crossing of Chelsea Embankment would be provided to allow pedestrians to cross on the northern footway with ease. Pedestrians could then rejoin the riverside using an existing signalised pedestrian crossing just west of the Bullring. These arrangements are acceptable.
- 8.8 Disappointingly, transport assessments for sites within the Royal Borough have not yet been published. An opportunity to review the TAs in advance of the submission of the Development Consent Order would be valuable.