

## **Counters Creek Storm Relief Sewer Consultation Phase 2**

Thank you for consulting the Mayor of London on the sewer proposals.

### **Principle of the Counters Creek Storm Relief Sewer**

The Mayor remains supportive of the principle of the Counters Creek Storm Relief Sewer, for the reasons stated in his response to the Phase 1 Consultation.

The Mayor has recently consulted on a London Sustainable Drainage Action Plan with the aim of creating a “step change in the use of sustainable drainage systems within London”. This has received a good level of support and is expected to be published later in 2016.

The Mayor is aware of the Thames Water project to deliver sustainable drainage at three locations in the Counters Creek catchment. These projects have been on-going for several years now and it is understood and welcomed that these projects are now moving to delivery stage.

However, despite the above early progress toward making London’s drainage system more sustainable, as stated in the Phase 1 Consultation, the Mayor is concerned to ensure that the proposed Storm Relief Sewer makes suitable allowance for the nature and scale of development proposals that will contribute flows to the Counters Creek Catchment.

There are firm proposals for a large amount of new development within the Counters Creek catchment area. Such proposals include White City, Earls Court and Old Oak Common. The Mayor is keen to see sustainable drainage solutions in place for these developments and, in particular for Old Oak Common, the emerging Integrated Water Management Strategy, is demonstrating how rainwater and potentially foul water can be diverted away from the combined sewer system. However, there does not appear to be any analysis of how any additional flows from new development within the Counters Creek catchment would impact on the proposed project and its level of performance.

As pointed out in the Phase 1 consultation, it would be relatively inexpensive and a marginal increase in disruption to increase the scale of the project at this stage compared to having to increase capacity in the coming decades. Any application should set out what impact proposed development over at least the next 25 years would have on the performance of the proposed Storm Relief Sewer.

Therefore, subject to the queries raised within this report, in principle the Mayor supports the proposed sewer project. This support is backed up in general terms by London Plan policy 5:14.

### **Integration with Thames Tideway Tunnel (Tideway)**

The Tideway project is referenced at several points in the consultation document. There is a clear interaction at the Cremorne Wharf site which both the Counters Creek and Tideway project propose to utilise during construction and in operational phases of the respective projects.

It now appears that there is a greater degree of integration between the two projects since the Phase 1 Consultation. This is to be welcomed, but it is noted that these integration issues do

not yet appear to be fully resolved. This may be expected at the current stage but the relationship will need to be more fully resolved and set out as part of any planning application.

### **Construction Impacts**

The construction activities will create a range of impacts that will be of concern to local residents, businesses and road users, especially as the construction activities at some sites extend to over 3 years. These have been outlined in approximate levels and significant further work will be required on these. Such issues have been considered by the Tideway project and a number of commitments to design, operation and management of such construction works have been provided which will manage these impacts. These commitments include; an Engagement Plan, Communications Plan and working groups between the relevant local authorities and TfL. Whilst yet to be fully tested during main construction activities, the Tideway approach is considered to be an appropriate approach for a major construction project and the Counters Creek project should seek to establish similar measures.

### **Operational Impacts**

Residents and businesses will also be concerned about the permanent operational impacts, in particular of any noise, odour or vibration and any required vehicle movements/access. The documentation indicates that these impacts will be minimal. This is welcomed but will need to be appropriately evidenced in any application.

### **Tunnelling Strategy**

The tunnelling strategy has changed significantly since the Phase 1 Consultation.

The Strategy is now for a main tunnel drive generally south to north from Site 1 (Cremorne Wharf) to site 4 (Tesco Car park). There will also be a short tunnel drive from site 3 to site 5 and works to link the two tunnels.

This change is welcomed as it will generally reduce construction impacts and enable significantly greater use of river barges to transport excavated tunnel spoil and to import tunnel construction materials.

### **Transport**

Some of the proposed works are located on or close to either the Transport for London Road Network (TLRN) or Strategic Road Network (SRN) for which TfL has traffic management responsibility. As such TfL will need to ensure that during both the construction and operation there is no unacceptable impact on the road network, and that any adverse impacts are mitigated. This will be set out in a series of Transport Assessments, both for the project as a whole and for each individual worksite. This approach is supported, and the applicant is in discussions with TfL over the content of these documents.

In assessing any adverse impact on the road network, TfL will also need to safeguard bus infrastructure and operations in proximity of the sites. Similarly TfL will expect provision for safe movement of pedestrian and cyclists to be made where necessary and plans will need to be set out in a Construction Logistics Plan to be agreed by TfL and the councils involved. The travel patterns of construction workers will also need to be assessed.

London Underground (LU) Infrastructure Protection will need to assess the impact of the scheme on its operational infrastructure given the proximity of several sites close to the District and Circle and Piccadilly lines. All works will be subject to assessment by an LU engineer and appropriate planning conditions will be required.

Construction Logistics Plans will be needed for each site. This may include caps on vehicle numbers and / or restrictions on timings to minimise impact on the road network at sensitive times. This will be particularly important given a number of other large construction programmes that will be underway in this area of London simultaneously.

It is expected that on going servicing and maintenance will be required at various locations. TfL expects that plans for this will be set out and measures put in place to ensure impact on the transport network is minimised.

The proposed use of the river for transport of excavated materials is welcomed. However, the applicant is encouraged to make as much use of the river as possible. An approach similar to the “More by Water” approach taken by Tideway would be supported, and should be expected to be readily capable of delivering tunnel construction materials and potentially tunnel boring machines by barge, given that similar processes and infrastructure will be established by Tideway. To this end, the provision of a water-based consolidation centre is supported and there may be scope for optimising/sharing infrastructure with the Tideway project in order to reduce costs and land take.

Similarly, the provision of an inland logistics yard for freight consolidation would be strongly supported. However, the use of the site identified as part of the consultation at Holland Park roundabout is likely to pose significant road safety and traffic capacity challenges, as well as conflicting with a TfL cycle improvement scheme. The applicant is encouraged to consider alternative sites in the area, for example at Park Royal.

### **Site Specific Comments**

Several of the sites have been changed since the Phase 1 Consultation. The detailed comments on these are something for the relevant London Boroughs to consider.

In principle the changes since Phase 1 consultation are beneficial, and in particular the proposal to drive the tunnel mainly in one tunnel drive from Cremorne Wharf is supported. The reason for this is that it will enable greater use of river transport for construction materials transport.

### **Site 1 Cremorne Wharf**

#### **Summary of Proposed uses**

Main tunnel drive site and connection into the Tideway Tunnel. Tunnel spoil to be removed by barge, proposals will consider importing tunnel construction materials by barge. Construction includes temporary works in the River Thames

#### **Comments**

The site is currently designated as a waste handling site and safeguarded wharf and is set to be used in connection with the Tideway project construction. It is closely bounded by a mixture of purpose built flats accommodation and more traditional housing stock and will soon have new residential accommodation on the redeveloped Lots Road Power Station site.

The site is now proposed to be the main tunnel construction site for the project. This is supported and should ensure a net reduction of construction impacts across the whole project.

Close integration is required with the Tideway project and it is encouraging that this appears to be progressing, although not completely resolved.

The project is proposing that this site will transfer tunnel spoil material to barge for onward transport. This is supported but all opportunities to expand the use of river transport should be examined, in line with the comments under Transport, above.

It will also be necessary to demonstrate how the proposals comply with London Plan Policy 7.26 and the associated Safeguarded Wharf designation. The Mayor is aware that Thames Water's consultants are currently working on this and the progress appears to be generally positive.

The works involve construction within the River Thames which is a Metropolitan Level Site of Importance for Nature Conservation (SINC). Any necessary mitigation or compensatory habitat should be agreed with the Environment Agency.

### **Site 2 Talgarth Rd/Trevanion Rd, Hammersmith**

Summary of Proposed uses

Access shaft only

#### **Comments**

It is understood that the use of this site will require ad hoc lane closures on the A4. On the basis that these closures take place overnight only, this is likely to be acceptable. However, any daytime closures would be of significant concern. As well as this, more significant footway closures are proposed. Because of the length of pedestrian diversion routes associated with these closures, the applicant would be expected to demonstrate that there is no alternative to this approach before this would be considered.

In the permanent scheme, access into this area would be required on an infrequent basis. As such, the detailed design of any reinstatement scheme would need to be agreed with TfL.

### **Site 3 Maclise Rd car park and woodland**

Summary of Proposed uses

Interception of Hammersmith Storm Relief Sewer (Duplication branch), drive site for the spur tunnel to site 5 and air management building.

#### **Comments**

The proposals include construction on a Borough level Site of Importance for Nature Conservation (SINC). There will be a significant and long-term impact on an area of woodland. It is acknowledged that the site is relatively small and dominated by Sycamore, however it provides an important area of continuous tree cover and makes a valuable contribution to ecological connectivity in the context of Hammersmith & Fulham.

Therefore, whilst the impacts are accepted as necessary, the restoration proposals are welcome as they will result in a more species diverse woodland over time. Consideration should be given to additional compensatory planting within the locality in recognition that the restoration proposals will take several years to mature.

### **Site 4 Tesco Shepherds Bush Rd car park**

Summary of Proposed uses

Interception of Hammersmith Storm Relief Sewer Brook Green branch and reception of tunnel boring machine.

#### **Comments**

Thames Water should consider the installation of sustainable drainage measures within the car park as part of the site restoration.

**Site 5 Holland Villas Rd/ Lower Addison Gdns**

Summary of Proposed uses

Interception of existing Counters Creek sewer and reception of spur tunnel boring machine.

Includes works across highway

**Comments**

The proposed works within the highway will require traffic modelling. The impacts of these works will subsequently need to be discussed further with TfL.