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Phil Stride  
Head of London Tideway Tunnels  
Thames Water  
Via email

30 January 2012

Dear Mr. Stride

### **Thames Tunnel**

Putney Society's starting point is that we fully support the objectives of the Thames Tunnel project. However, our focus is to make sure that implementation provides the maximum benefit for Putney residents and the wider community whilst also minimising costs and disruption. To that end we have examined your Phase Two Consultation proposals and consulted our members. Our conclusions are set out below.

#### **1. Main drive sites**

The Society's response to Thames Water's (TW's) Thames Tunnel Phase 1 consultation stated that **WE VIEW BARN ELMS AS TOTALLY UNSUITABLE FOR USE AS A MAIN DRIVE SITE**. Central to this view is the fact that the section of the Thames adjacent to Barn Elms is very narrow, shallow, strongly tidal and intensively used for economically valuable rowing and sailing events. These events draw international competition and worldwide audiences all year round. This makes this part of the river unsuitable for heavy industrial traffic on barges. Main drive barge traffic on this part of the river brings a further risk to transport in London as large numbers of barges would have to pass under critical bridges. For these reasons we stated a main drive site location further downstream is required.

Additional reasons for viewing Barn Elms as unsuitable include road traffic issues, the impact on recreational users of Barn Elms and the principle that greenfield sites should not be chosen when alternative brownfield sites exist. For example the roads around Barn Elms are totally unsuited to and would be unable to cope with the considerable increase in traffic, including heavy traffic, which would inevitably be generated by the use of Barn Elms as a main drive site.

In relation to recreational use of Barn Elms, Wandsworth Borough Council estimate approximately 10,000 people use it during summer weekends. Clearly major works would have a substantial negative impact on a large number of people. It also is clear that brownfield alternatives exist.

**FOR ALL THESE REASONS WE CONTINUE TO VIEW BARN ELMS AS TOTALLY UNSUITABLE FOR USE AS A MAIN DRIVE SITE.**

**The Putney Society**

The amenity society for Putney and Roehampton  
Registered Charity No. 263242

**THE SOCIETY CONCURS WITH TW RATIONALE FOR THE CHOICE OF CARNWATH ROAD AS A MAIN DRIVE SITE INSTEAD OF BARN ELMS.** TW state the principal reasons for their change of plan to be:

- Carnwath Road is a brownfield site.
- The existing wharfs and width of the river at Carnwath Road will allow the use of larger barges.
- There will be much less conflict with the recreational uses of the river than at Barn Elms.

## **2. Putney Bridge CSO**

### **Transport and Working Methods**

The Society is extremely concerned about the impact of the proposed works at Putney Bridge on the environment, transport, local businesses and local residents. Central to these concerns is the proximity of these works to a major river crossing, to homes and businesses and their potential environmental impact on Putney High Street.

Lower Richmond Road, Putney Bridge Road, Putney High Street and Putney Bridge itself all suffer from extreme traffic congestion with traffic queuing for extended periods throughout most of the day. The result of this is very high levels of environmental pollution.

The Society has been very concerned about harmful air pollution in Putney for some time. Accordingly with support from Mapping for Change (a social enterprise set up by University College London and London 21) we mobilised volunteers to conduct a survey of Nitrogen Dioxide (NO<sub>2</sub>) levels at 36 sites in central Putney over four weeks in September/October 2011. Key findings from our survey include:

- NO<sub>2</sub> levels 75% in excess of EU limits not only in Putney High Street (recorded by Wandsworth Council) but also at Putney Cross and on Putney Hill (in our survey).
- NO<sub>2</sub> levels 25% in excess of EU limits along the Upper Richmond Road and close to the High Street.
- EU limits for NO<sub>2</sub> also exceeded on several residential roads in Putney.

Our study clearly shows that the pollution effects of traffic on major roads also spread beyond the immediate locality. A further study was carried out, also in Sept/October 2011 by Mapping for Change, for Sustrans on routes in Fulham and Putney, including the Lower Richmond Road. This study indicates that NO<sub>2</sub> levels are in excess of 150% of EU limits on the Lower Richmond Road.

If these levels are not concerning enough we learnt from the King's College London Air Quality Network (<http://www.londonair.org.uk/>) that the maximum of 18 hourly NO<sub>2</sub> exceedances per annum was exceeded three days into 2012, on 3<sup>rd</sup> January 2012, in Putney High Street. Quite clearly any increase in the most polluting heavy vehicles will exacerbate this.

To emphasise this point, evidence of the pollution effects of heavy goods vehicles has recently been underlined by a study commissioned by Wandsworth Council and carried out by TRL in early October 2011. The study measured air pollution in Putney High Street and tied this to specific vehicle types using ANPR cameras. While HGVs comprise just 2% of traffic movements (approx 400 movements per day) they generate 7% of NO<sub>2</sub> and 7% of PM<sub>10</sub> emissions. From this it is clear that any increase in HGV traffic will have a disproportionate effect on NO<sub>2</sub> and PM<sub>10</sub> levels. NO<sub>2</sub> levels are already well in excess of EU limits at all relevant locations in the vicinity of the Putney Bridge CSO.

These levels of pollution also demonstrate that the roads at and around Putney Bridge are already at full capacity. It is widely recognised that once roads approach their capacity limits even apparently small increases in traffic create a disproportionate impact on congestion. This in turn creates

substantial economic costs as well as creating a further substantial increase in already unacceptable pollution levels.

In this context the Society welcomes the use of barges to reduce traffic and environmental impacts. However we are concerned about strength of commitment and want to see a substantial increase in barge use. Indeed **GIVEN THE PARTICULAR TRANSPORT AND POLLUTION ISSUES IMPACTING THIS SITE IT IS OUR VIEW THAT PUTNEY BRIDGE MUST BE CONSIDERED EXCEPTIONAL** and the starting point for TW planning should be that **ALL CONSTRUCTION TRAFFIC SHOULD BE BY RIVER** and **ALL STAFF SHOULD BE REQUIRED TO USE PUBLIC TRANSPORT** to access this site.

TW must then make a case for any relaxation from this principle and as an absolute minimum use the river for all temporary slipway materials, all shaft & tunnel spoil, precast concrete segment delivery and machinery delivery/removal in addition to the delivery & removal of coffer dam infill currently proposed. **IF TW SEEK TO MAKE A CASE FOR ROAD USE WE WOULD NOT VIEW THE SIMPLE EFFECT ON CONSTRUCTION COST OR TOTAL VEHICLE MILES AS ADEQUATE JUSTIFICATION.** Rather **ANY PROPOSAL MUST RECOGNISE AND EVALUATE THE ECONOMIC COSTS OF INCREASED CONGESTION IN PUTNEY AS WELL AS THE COSTS AND HEALTH IMPACT OF THE INCREASED POLLUTION SUCH ROAD USE WILL GENERATE.**

If, at the end of this review process, any use of road transport is sanctioned, the Society considers it essential that robust measures are in place to enforce traffic routing to prevent the use of Putney High St. and Oxford Road.

The Society also welcomes TW's continuing work to evolve design and working methods to reduce the impact of these works e.g. TW no longer likely to completely fill behind coffer dam, Bailey Bridge type construction under consideration for temporary slipway. In our opinion the transport issues discussed above together with the proximity of these works to homes and businesses make it essential that TW continue to develop their working method proposals to reduce the scale, environmental impact, noise and disruption arising from these works. We would like to be involved in that process and believe that there may be further opportunities to reduce works impact, especially on traffic generation, when a contractor has been appointed. We would wish to be involved in value engineering and environmental impact reduction at that stage.

Ensuring that the historically significant slipway and the University Boat Race (UBR) stone are undamaged and that the maximum protection possible is afforded to the trees on Waterman's Green are all important considerations which we believe TW must also take into account as they continue to develop their proposals.

## Design

### i) permanent works

The protrusion into the river to be constructed on the foreshore east of Putney Pier is the most significant of the structures to remain in place on the completion of the TT works and will be the most dramatic change to the Embankment conservation area. It is vital that its detailing is sympathetic to the character and appearance of the conservation area.

Greater clarity is needed on the impact of the construction of this major development on adjoining features such as the riverside's large Plane trees, the Alan Thornhill sculpture, the UBR stone and the fine streetscape detailing of the granite stonework at the junction of the Embankment with the slipway down to the river. Its terrace surface, which is open to the public, needs to relate to the adjoining levels of pedestrian movement along the Embankment. The design of the vents is also an area of concern.

The detailed design of the structure and vents needs to be given more consideration in order that what is finally agreed is the product of greater community discussion than has taken place so far. A

design competition might be a useful element in this discussion and we would expect to be consulted further on this and other aspects as the design process progresses.

In relation to Watermans' Green, TW's Phase 1 consultation proposals left this important amenity untouched. It is very disappointing that the Phase 2 consultation now has a proposal to build on this open space when a suitable brownfield alternative exists.

To put this in context, Watermans' Green is a visually important open space supporting 100-year old trees of significant amenity value. The setting of the listed Putney Bridge is enhanced by the trees especially the five mature Holly, an all-year round feature. This open space and its trees must not be damaged.

Building on Watermans' Green is quite unnecessary given that there is a directly adjoining brownfield site which could accommodate the Tunnel equipment which needs to be housed. The former gents' toilet has been empty ever since it was closed by WBC and it is now privately owned. It is our view that TW should reach an appropriate commercial arrangement with its owners enabling TW to take over this former toilet and leave Watermans' Green intact.

Regarding the proposed vent shaft adjoining Putney Bridge - the Grade II Putney Bridge's setting will be damaged if the proposed vent shaft adjoining the bridge is of excessive height and discordant design. Its detailing needs to be given more consideration before it can be considered acceptable. The Society is not yet satisfied that this element in the proposals has been given adequate design thought. Clearer detailed proposals are needed.

## **ii) temporary works**

We view it as essential that temporary works in general and the temporary slipway in particular are viewed by all parties as just that - temporary constructions which are removed once CSO connection is complete. By making this clear from the outset the risk of damage to a historic and important part of Putney from temporary structures becoming permanent will be avoided.

However, given the three year plus duration of these works, that is not to say that the design of temporary works is unimportant. We view it as important that colour, design and materials selected for temporary works are in keeping with their surroundings. Similarly the design of the temporary slipway needs to be simple and responsive to the special character of Putney Embankment. Its appearance must not damage the conservation area.

This is a highly visible site regularly televised to a worldwide audience (e.g. for the University Boat race) and as such it impacts on London and the UK's global image. It is an unmissable opportunity for TW and its contractors to showcase their ability to address such issues in their work.

## **Legacy**

The considerable disruption inevitable from these works makes it appropriate that TW also seek to compensate Putney residents by leaving a positive legacy improvement. For example it would be highly desirable if, through the works on Putney Bridge, TW were able to create a safe passage connecting the riverside path at both sides of the Bridge.

Our initial investigations suggest that suitable design of arrangements to intercept the storm outlet could enable TW to connect the tunnels leading off the churchyard east of the bridge to the vaults in front of 2-4 Putney High Street (west of the bridge). As the tunnel nearest to the river is heavily used by the Church for community meetings we suggest that the opportunity to use the second tunnel is thoroughly investigated. The resulting passageway could provide substantial benefit at a relatively modest cost. We would wish to be involved in progressing this valuable opportunity to provide a positive legacy.

### **3. Barn Elms CSO**

#### **Location**

Whilst we understand the need for the site to include the current CSO the proposed location is very close to residential property, e.g. in Horne Way. Hence we believe that it is important that design options are reviewed and every effort is made to move the work site further west, whilst still remaining tucked into the bend in the field edge, thus increasing the distance from residential property without negatively impacting on Barn Elms open space.

We would also like to see a detailed consideration of the use of the Beverley Brook basin as an alternative location for the CSO structure before a final decision is made.

#### **Transport**

The Society is concerned about the impact of TW's proposed temporary roadway adjacent to Beverley Brook. It is our view that the consequent damage to trees and disruption is unacceptable. Hence we consider it vital that TW adopt the alternative route along the North Edge of Barn Elms currently in use by the Environment Agency.

#### **Design**

It is our view that the size and design of proposed permanent works creates excessive and negative visual impact on Barn Elms. The proposed buildings to be left on the playing fields need to be as inconspicuous and as green as possible. Their design needs to respond to the character of this greenfield site so that they blend in and harmonise with the surrounding open space and trees. Hence the alternative, discussed in a number of meetings, of grassed mounds would be much more in keeping with their surroundings and is greatly preferable.

#### **Legacy**

The considerable disruption inevitable from these works makes it appropriate that TW also seek to compensate Barn Elms users and local residents by leaving a positive legacy improvement. In this context we have three suggestions to make:

- A bridge across Beverley Brook connecting the Horne Way estate with the Beverley Brook path.
- Pollarding or removal and replacement of the trees which overhang the river and are a danger to rowers and sailors at high tide.
- Dredging the river to reduce the wide flat at low tide where boats tend to get damaged on the old revetment blocks left after previous repairs. Possibly the dredging could be used to fill the temporary works at Putney Foreshore thus reducing the transport and environmental impact of those works.

We would be pleased to discuss these suggestions further with you.

Yours sincerely

Carolyn McMillan  
Chairman

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Thames Tunnel Convener