



HOUSE OF COMMONS
LONDON SW1A 0AA

14th January 2011

Justine Greening MP's response to the Thames Tunnel consultation

The River Thames is a really important and much loved amenity in our constituency and I believe we should be working to ensure the river is protected and looked after for residents today and future generations. The overwhelming majority of my constituents agree that action needs to be taken to address the serious problem of sewage discharge into the River Thames. Sewage discharge is a real problem that affects us locally, with 820,000 tonnes of untreated sewage being pumped directly along the Putney stretch of the Thames annually. I have worked with Thames Water, local rowing clubs and river users to help develop plans to reduce the amount of sewage in the Thames, including pressing for more skimmer boats and for the implementation of a sewage discharge warning system. Some limited progress has been made. However, it is clear that our current sewage network needs a sustainable long term solution in order to protect our river and those around it. I believe building a new interceptor tunnel is the most viable solution available to tackle the 39 million tonnes of sewage flushed into the River Thames each year, which is likely to increase in future years given the probability of wetter winters, more intense rainfall and greater climate variability in the UK. I very much support the Environment Agency's involvement in the project.

Thames Water has identified a number of preferred sites locally needed to construct the Thames Tunnel, including Barn Elms, Putney Bridge Foreshore and King George's Park. Thames Water has also shortlisted sites along Lower Richmond Road and near King George's Park. I have had a number of constituents raise concerns about proposals for these sites and how the project will impact on our local community and environment. I have enclosed with my consultation response correspondence from my constituents which set out their concerns in their own words. As part of the consultation process I have been actively engaged with Thames Water in highlighting my constituents' concerns and I have also organised a number of public meetings for residents to attend and raise their concerns directly with Thames Water. I am also pleased that Thames Water agreed to extend the consultation deadline to allow residents to consider the proposals over the Christmas period.

The Thames Tunnel is a very important project for London and whilst I support the project in principle, there are a number of concerns about how the project will affect my constituents locally and wider strategic issues about the development process that I wanted to highlight in this first round of consultation for Thames Water's consideration. The concerns of local residents are to ensure that a project to protect and enhance the river environment does not cause other environmental damage itself.



Local Sites

Barn Elms

An area towards the southern edge of Barn Elms School Sports Centre playing fields has been identified by Thames Water as the preferred main drive shaft site and combine sewer overflow site. Thames Water has indicated that construction on the site would take approximately seven years. Although the Barn Elms site is not within my constituency, the site does back on to a number of residential roads in my constituency and Barn Elms playing fields is a local amenity that many of my constituents use so the use of this site will undoubtedly impact on my constituents. Furthermore, I have been contacted by a large number of my constituents who strongly oppose the use of Barn Elms as the main drive shaft site.

Barn Elms is a large green open space that local people love. It significantly enhances the river scene and local area with its facilities. Whilst I understand the location of the preferred site in relation to the need to pick up sewage from the West Putney sewage overflow at Beverly Brook, I do not think it is appropriate to use this greenfield land for one of the Tunnel's main drive shaft sites. It is important to note that the scale of development needed for a main draft shaft site is significantly larger than the Combine Sewage Overflow (CSO) sites. The proposed construction period is over three times longer than the preferred CSO sites in Putney and King George's Park, and the size of construction site is considerably larger than the other sites so the use of this preferred site for a main drive shaft will have a huge impact on nearby residents and our surrounding environment. I fully share residents concerns over development on this greenfield site and the loss of sports facilities which many local schools and sports clubs use. Many residents feel that suitable alternative brownfield sites have not been properly considered by Thames Water. It has proved difficult to get clarity on which other sites are possible options and why they have not been proposed. I feel the loss of such valued community greenfield amenity space during the lengthy construction period and once construction is complete is unacceptable and alternative options must be seriously considered by Thames Water before they proceed with the selection of this site. I would urge Thames Water to consider other driving options that would mitigate the need for a drive shaft site at Barn Elms. A number of my constituents have suggested Thames Water consider driving from Tideway Walk to directly to Hammersmith Pumping Station.

Concerns have been raised about how works on this site will affect leisure and recreational users of the river and the river tow path, particularly the jetty that is proposed for removal and delivery of materials. I urge Thames Water to continue to engage and work with organisations that represent those who use the river to mitigate any foreseeable problems. Given the nature of the project, there will unfortunately be unavoidable disruption to river users and Thames Water must ensure this disruption is kept to an absolute minimum during the lengthy construction period proposed for this site. That said, this project is crucial in resolving the long term problem of sewage in the river and safeguarding the use of the river for future generation of leisure and recreational users from the public health risks a polluted Thames will pose.

As I have stated Barn Elms is a large green open space that significantly enhances the river scene and local area. There are real concerns locally about the impact of the proposal on the towpath and the unspoilt character of the area. Thames Water has proposed that a ventilation column (approximately 15m high and 3m diameter) and a building (approximately 10m high, 12m wide and 20m long) to



provide ventilation and filtering of the air in the tunnel will be required at this site. Thames Water has also proposed to leave the area around these structures as hard-standing to allow vehicle and pedestrian access for maintenance, further changing the current landscape. I would strongly urge Thames Water to engage local residents to discuss the permanent look and long term use of the site to reduce the visual impact of the completed site in what is a very open and natural space, although this greenfield site should not be selected in the first place.

Residents have also raised concerns about construction traffic from the preferred site exacerbating congestion on our local roads as well as the Thames. I note that Thames Water plan to use the river as much as possible to remove spoil from the site rather than lorries. Whilst I fully support Thames Water's desire to use the river, I would urge Thames Water to work to reduce the safety risks involved with this and the impact on other river users. Residents have also raised concerns about Thames Water's vehicular access proposals for this site. Thames Water has put forward two options for vehicular access, option 1 would require a new dedicated route along the southern perimeter of the sports field and connect to Rocks Lane, option 2 would share the existing access passing through the sports field and connect to Queen Elizabeth Walk. In particular residents are rightly concerned that the access route will cause further loss of green space as well as increase the risk of vehicle accidents on the site by having a numbers of heavy goods vehicles driving around a busy recreational site where children are often playing.

Residents in nearby roads, particularly those in Horne Way who will directly face the construction site, have raised concerns with me regarding the impact of construction on this site on nearby properties both physically and in terms of noise & light pollution. These concerns are exacerbated by the lengthy construction time predicted for this site as well as the potential use of 24 hour working. I urge Thames Water to consider the full impact of seven years of construction on local residents and to undertake appropriate action to reduce the impact of construction on nearby properties and where possible work to reduce the construction period. I would also like Thames Water to produce some more detailed information on what measures they will put in place for residents whose properties (and quality of life) may be seriously affected by this construction.

Additionally residents have raised concerns about Thames Water's shortlisted site at Leaders Gardens off Putney Embankment. Leaders Garden is a well used and valued local park and children's playing area which significantly enhances our riverside experience and is surrounded by a number of residential roads. Residents are very concerned about the loss of a local park and the impact construction would have on the riverside experience if this site was used.

Putney Bridge Foreshore

Putney Bridge Foreshore has been identified as a preferred Combined Sewer Overflow (CSO) site. Thames Water has indicated that construction on this site will take approximately two years.

Whilst I fully understand that the location for the CSO is restricted by the location of the current CSO in the southern supporting arch of Putney Bridge, I do have serious concerns about the implications on our local road network of having a construction site at the preferred location, which is on the corner of a major road junction that is already very congested. Local residents have also raised concerns with me about construction traffic exacerbating congestion at this busy junction as well as along Embankment and Lower Richmond Road. Thames Water must ensure appropriate consideration has been given to the planning and execution of these works on our local road network.



Concerns have also been raised about how works at this preferred site will affect rowers and in particular the annual Boat Race. I understand Thames Water is engaged in consultation with the Thames Regional Rowing Association, Royal Yachting Association, and the organisers of the Boat Race to minimize the impact of the construction of the Thames Tunnel on the leisure and recreational users of the river who are affected most by sewage overflows in the Thames. As I have stated earlier in my submission, I urge Thames Water to continue to engage and work with organisations that represent those who use the river to mitigate any foreseeable problems. Given the nature of the project, there will unfortunately be unavoidable disruption to river users and Thames Water must ensure this disruption is kept to a minimum during the lengthy construction period proposed for this site. Again, that said, this project is crucial in resolving the long term problem of sewage in the river and safeguarding the use of the river for future generation of leisure and recreational users from the public health risks a polluted Thames will pose.

Residents have raised concerns with me regarding the impact of construction at this preferred site on nearby properties both physically and in terms of noise & light pollution during the two year construction period predicted for this site. I urge Thames Water to undertake appropriate action to reduce the impact of construction on nearby properties and where possible work to reduce the construction period. I would also like Thames Water to produce some more detailed information on what measures they will put in place for residents whose properties (and quality of life) may be seriously affected by this construction.

Residents in neighbouring Kenilworth Court, who look directly over the Thames and over this site, have also raised concerns with me about the visual impact of the preferred site, which is Victorian, and the potential increase in noise and air pollution from the lasting above ground structures, particularly the proposed 10m high ventilation column. To accommodate the above ground structures required for this site Thames Water has proposed to extend the existing river wall to create a new area of hard-standing and a new, realigned, slipway will be constructed as part of the work. The proposed structures to be located on this new area would include a ventilation column (approximately 10m high and 1m diameter), along with a rectangular kiosk (approximately 1.5m high, 1m wide and 3.5m long) housing electrical and control equipment. Thames Water should ensure that sufficient work is undertaken to prevent noise and air pollution from the lasting above ground structures, and reduce their visual impact. This site is at the very heart of Putney and any lasting above ground structures on the site will have a huge impact on the feel and character of Putney. I would like to see the Victorian brickwork and rustic nature of this location preserved if the site is taken forward by Thames Water. I would strongly urge Thames Water to engage local residents to discuss the permanent look and long term use of the site to ensure it will benefit local residents and enhance our river experience.

A number of residents have made a preference to the CSO being located at Thames Water's second shortlisted site, on the other side of the bridge by St Mary's Church, which they feel would lessen the impact on residents. St Mary's Church plays a very important and historical role in our local community and the impact of locating the CSO site at site 2 on the Church could be significant. Nevertheless, there are some residents who want Thames Water to continue to consider the possibility of this location for the site.

King George's Park

Thames Water has identified the northern section of King George's Park as the preferred site for a proposed CSO. Thames Water has indicated that construction on the site would take approximately two years.



I understand the siting of the preferred CSO site in this location as the route of the existing CSO pipework is beneath the northern part of the park. However, I do have concerns about the loss of open green amenity space during the construction period so I urge Thames Water to continue efforts to reduce the impact of the works on the park and local residents.

Residents have raised concerns with me regarding the impact of construction at this preferred site on the surrounding area both physically and in terms of noise & light pollution during the two year construction period predicted for this site. Thames Water should undertake appropriate action to reduce the impact of construction on nearby properties, and the park, and where possible work to reduce the construction period.

Concerns have been raised about the permanent impact of the above ground structures required at this preferred site once the works are completed. Thames Water has proposed that a ventilation column (approximately 10m high and 1m diameter) would be required, along with a rectangular kiosk (approximately 1.5m high, 1m wide and 3.5m long) housing electrical and control equipment. It is proposed to incorporate the ventilation column and electrical kiosk into a single structure. I would strongly urge Thames Water to engage local residents to discuss the permanent look and long term use of the site to reduce the visual impact of the completed site on the park and park users, and where possible not detract from residents' park experience.

Additionally, residents have raised concerns about Thames Water's shortlisted site at the car park off Broomhill Road, to the rear of flats facing onto Buckhold Road. In particular, residents are concerned about the loss of the parking facility and the proximity to residential dwellings. Some local residents have specifically expressed a preference for Thames Water's preferred site in King George's Park over the shortlisted site in the car park off Broomhill Road.



Wider Strategic Issues

Communication & Public Scrutiny

Throughout this first round of consultation, many people, including myself, have raised concerns about the information Thames Water has produced and the quality of their consultation. Many residents requested more detailed information about how the sites have been selected and about technical aspects of building the tunnel. A number of residents also raised concerns with me and at the public meeting I organised about Thames Water's consultation response forms - in particular, that the wording of the questions made it difficult to raise concerns about particular sites without objecting to the whole proposal. Some residents have also raised concerns about the scrutiny of Thames Water's proposal which is undertaken by DEFRA & OFWAT.

Looking forward, I would urge Thames Water to consider ways they can ensure the public is fully informed of the proposals and the second stage consultation. To help with this I have suggested setting up a working group comprising of local residents, local Councillors, myself and representatives from Thames Water, to ensure residents are fully engaged with developments on the Thames Tunnel project and to hold Thames Water to account on the issues that matter to us locally.

I would also encourage Thames Water to listen and seek advice from bodies such as the Environment Agency, who play a key role in protecting and improving our environment, as well as promoting sustainable development.

Finally, I would like to see an independent expert retained for use by any working group to provide the necessary impartial advice and perspective on future proposals.

Cost

Thames Water has estimated the cost of the preferred route option for the Thames Tunnel to be £3.6 billion, which could mean Thames Water customers face an additional charge of £60-65 per year to pay for the tunnel. Whilst I understand that OFWAT will scrutinize the construction costs and decide how the costs of the project should be included in the bills of Thames Water customers, I would encourage Thames Water to publish more information of the predicted costs in the next consultation stage as currently no detailed information has been provided on how the cost of this project will affect my constituents as Thames Water customers. I would also like to see what schemes Thames Water will have in place for any customers that face significant hardship and may be unable to afford the additional costs.

Employment opportunities

The Thames Tunnel is a very important project for the whole of London and will impact hugely on local communities across London. I believe the Thames Tunnel could be a great opportunity to not only benefit our city by cleaning up our polluted river but also by providing employment opportunities. I would encourage Thames Water to consider what measures can be put in place to maximize the employment of Londoners in the construction of the Thames Tunnel. I would like to see Thames Water



embrace the opportunity to provide local employment by setting ambitious targets for their contractors to fulfill. In order to ensure Londoners are equipped with the necessary skills I would urge Thames Water to work with local education providers to plan appropriate training in advance of the construction phase of the project.

Conclusion

Although the Thames Tunnel is the most viable sustainable solution to tackling the serious problem of sewage overflow in our river, it will clearly cause disruption to my local constituency and across London. Thames Water need to ensure that this disruption to local businesses and residents is fully considered and measures are put in place to reduce this wherever possible.

It is clear from the feedback I have received as the local MP that the Thames Tunnel project will have a major impact on our community. Residents are rightly concerned about the huge disruption and local environmental impact involved in setting up a main draft shaft at Barn Elms, which we feel is unacceptable. I also share many residents' concerns about the impact of the combine sewage overflow sites at the Victorian Putney Bridge Foreshore and King George's Park sites on our local area and local transport infrastructure.

We do need the Thames Tunnel, but we also need to ensure the project works for us locally and that the sites Thames Water take forward make sense and work within our existing environment. It is vital that Thames Water seriously consider the concerns I have outlined above and the concerns raised by residents during this consultation period as the project is developed.

A handwritten signature in black ink, appearing to read 'Justine Greening', with a long, sweeping flourish extending to the right.

Justine Greening MP
Putney, Roehampton & Southfields