

MAYOR AND CABINET		
Report Title	Response to Thames Water (Phase 2) Consultation on Thames Tunnel	
Key Decision	Yes	Item No.
Ward	All	
Contributors	Executive Director for Resources & Regeneration (Head of Planning) & Head of Law	
Class	Part 1	Date: 18 January 2012

1. Summary

- 1.1 Thames Water are currently conducting Phase 2 consultation on their Thames Tunnel proposals. These proposals include two 'preferred sites' within the borough, one at Deptford Church Street and one at Earl Pumping Station.
- 1.2 The Council's official response to the Phase 2 consultation, also reflecting the concerns of residents, should be submitted to Thames Water by the close of the consultation on 10 February 2012.
- 1.3 A summary of the main community and Council concerns are set out in sections 6 and 7 of this report.

2. Purpose

- 2.1 This report seeks the Mayor and Cabinet approval for the submission of the official Lewisham response to the Thames Water consultation on the Thames Tunnel.

3. Policy Context

- 3.1 The content of this report is consistent with the Council's policy framework. This report supports the following Sustainable Community Strategy objectives:
 - *Empowered and responsible*: where people can be actively involved in their local area and contribute to tolerant, caring and supportive local communities;
 - *Clean, green and liveable*: where people live in affordable, high quality and adaptable housing, have access to green spaces and take responsibility for their impact on the environment;
 - *Healthy, active and enjoyable*: where people can actively participate in maintaining and improving their health and well-being, supported by high quality health and care services, leisure, culture and recreational activities;
 - *Safer*: where people feel safe throughout the borough and are able to live lives free from crime, anti-social behaviour and abuse; and

- *Dynamic and prosperous*: where people are part of vibrant and creative localities and town centres, well-connected to London and beyond.

3.2 The Core Strategy adopted by the Council in June 2011 is also part of the Council's policy framework. This report supports the following core strategy objectives:

- 1: physical and socio-economic benefits through regeneration and redevelopment opportunities;
- 4: economic activity through investment in new and existing business;
- 5: adapt and mitigate effects of climate change;
- 6: protect the borough from risk of flooding;
- 7: protect and enhance open space provision;
- 9: ensure an accessible, safe, convenient and sustainable transport system;
- 10: protect and enhance Lewisham's character; and
- 11: promote social inclusion and strengthen the quality of life for residents.

4. Recommendations

It is recommended that the Mayor:

- 4.1 Agree to formally object to Earl Pumping Station and Deptford Church Street as Thames Water's preferred sites at Phase 2 consultation on the basis of the concerns set out in section 6 and 7; and
- 4.2 Delegates authority to the Executive Director for Resources & Regeneration, in consultation with the Head of Law and Head of Planning, to agree the final response to Thames Water.

5. Background

- 5.1 Thames Water state that around 39 million cubic metres of untreated sewage and rainwater pollute the River Thames every year when the current stormwater/ sewage capacity is exceeded and a mixture of sewage and stormwater is diverted through the combined sewer overflow (CSO) pipes . These discharges occur, on average, once a week and have a significant environmental impact on the river.
- 5.2 Improvement works are required to enable the UK to continue to meet obligations under the EU Urban Waste Water Treatment Directive. The urgency of the works is increased by the infraction proceedings being pursued against the UK by the European Commission for an alleged breach of the Directive.
- 5.3 After several studies by Thames Water the Thames Tunnel was identified as the preferred infrastructure solution to address this issue. It comprises a major tunnel, likely to run for over 30km (including connection tunnels) from West to East London to intercept storm sewage overflows and transfer them for treatment at Beckton sewage treatment works (STW) in Newham, East London.

- 5.4 Thames Water is the organisation that the Government has instructed to identify a route and manage the project. Thames Water's preferred route is known as the Abbey Mills route; it is proposed the main tunnel starts at the Acton Storm Tanks in Ealing and then follows the Thames to Limehouse where it veers away from the Thames and runs underneath Tower Hamlets and Newham to the Abbey Mills Pumping Station and joins up with the Lee Tunnel (which is currently under construction) which then goes to the Beckton STW.
- 5.5 If the Thames Water preferred route is chosen the main tunnel will steer away from Lewisham, however, there are still proposals for a connecting tunnel to run from Greenwich Pumping Station to connect with the main tunnel at Chambers Wharf in Southwark. This connecting tunnel will intercept two CSO sites in LB Lewisham at Earl Pumping Station, Yeoman Street, Deptford and at Deptford Church Street.
- 5.6 Phase 1 consultation for the project started on the 13th of September 2010 and ran through until the 14th of January 2011. Earl Pumping Station was identified as a preferred interception site for the CSO shaft in an expanded Earl Pumping Station site on Yeoman Street. Officers wrote to Thames Water in response to the Phase 1 consultation and expressed concerns in regards to the impact of this proposal on the amenity of residents, the impact on regeneration proposals in the adjacent Plough Way Strategic Site and suggested that one of Thames Water alternative sites would be more suitable.
- 5.7 After the close of Phase 1 consultation, Thames Water announced that they were considering the Deptford Church Street site for an interception site for the CSO. This was due in part to the opposition to the Borthwick Wharf site proposal that was the preferred site in the Phase 1 consultation. Thames Water held what they called an interim engagement drop-in session on 24th and 25th June 2011. Officers wrote to Thames Water objecting to the use of the site and outlining a number of concerns relating to the effects of the construction works.
- 5.8 Thames Water are now undertaking Phase 2 consultation which runs from 4th November 2011 to 10th February 2012. The Phase 2 consultation provides an update on the changes made since the Phase 1 consultation. This involves presenting their preferred sites and some alternative sites for comment. Thames Water's preferred sites within LB Lewisham are Earl Pumping Station and Deptford Church Street.
- 5.9 In relation to the Deptford Church Street site, a local community opposition group called a public meeting on 15th November 2011 which 83 people attended and where Thames Water gave a presentation of the proposals and answered questions. Thames Water also held a public exhibition over three days from 17-19 November 2011 at the Creekside Centre, Deptford. A similar public exhibition in relation to Earl Pumping Station was held at Surrey Docks Watersports Centre from 12-14 December 2011.
- 5.10 The Thames Tunnel is considered a nationally significant infrastructure project and therefore in late 2012, following the close of Phase 2 consultation, Thames Water

intend to apply to the Infrastructure Planning Commission (IPC) for planning permission, rather than individual local authorities. Council officers will then prepare and submit a Local Impact Report which will detail the positive, neutral and negative impacts on the borough for consideration by the IPC.

6. Council Consultation Arrangements

- 6.1 The Council wished to fully understand local concerns in relation to both sites and therefore organised two public meetings, one focused on each site. A mail drop outlining the dates and purpose of the meetings was distributed to properties within a 400 metre radius of each site. Information was put up on the Council's website and a press release issued.
- 6.2 A meeting regarding the Earl Pumping Station was held 7 December 2011 at which Thames Water gave a presentation about their proposals and answered questions from the public. There was a poor turnout to the meeting however those residents in attendance generally supported the Thames Tunnel proposal with questions asked relating to engineering aspects, traffic impact, compensation for properties in close proximity and control of odour emissions.
- 6.3 A second meeting was held on 13 December 2011 in relation to Deptford Church Street and was attended by 16 members of the public. In addition to the comments received at the meetings, to date the Council has received 19 written objections to the proposals at Deptford Church Street and one telephone call in support of the Thames Tunnel project as a whole.
- 6.4 The objections to the use of Deptford Church Street raised by the public, both in writing and at the public meetings, cover the following issues:
- proximity to schools in the area and the associated impact of the construction works including the impact on education and health and safety;
 - impact on businesses in the area, including those on Deptford High Street and the historic market;
 - proximity to residences (many without double glazing);
 - impact on St Paul's Church, a Grade I listed building, in terms of the setting, operational requirements and the structural integrity of the building;
 - impact on archaeology in the area;
 - disruption to access in the area, pedestrian, vehicular and from buses, and the associated difficulties in reaching key local facilities;
 - availability of Borthwick Wharf as an alternative site, the use of which would give rise to less effects, particularly as the river can be used as a mode of transport (reducing road traffic), there is no operational school in the area, and there are fewer residential properties;
 - impact on the surrounding road network;
 - environmental effects such as noise, vibration and air pollution and the inadequacy of the assessment so far, for example effects on additional properties should be assessed;
 - odour effects from the completed sewer;

- value of the green space to the community;
- value of the site to nature conservation and the loss of mature trees;
- poor aesthetic value of the completed site;
- the works would counteract the recent regeneration and positive improvements;
- inadequacy of information provided and assessment undertaken by Thames Water to date, particularly in terms of quantified analysis and site selection methodology;
- structural impact from vibrations and tunnelling on houses and businesses;
- disruption to the open space link from Deptford High Street through to the Laban Centre; and
- inadequacy of Thames Water consultation to date.

7. Planning Considerations

Deptford Church Street Site

7.1 Alternative Sites

- 7.1.1 Borthwick Wharf Foreshore (BWF) was the Thames Water preferred site during the Phase 1 consultation. For the Phase 2 consultation Deptford Church Street (DCS) is the preferred site and BWF together with the Sue Godfrey Nature Reserve, Bronze Street, are put forward as alternative sites. Little information has been made available as to why Thames Water consider Deptford Church Street to be a more suitable site. Council officers have requested further information in relation to this issue. Data for comparison will be required as part of the full EIA which will be necessary to accompany any planning application to the IPC.
- 7.1.2 Thames Water Phase 2 consultation 'site information paper' identifies three reasons why DCS is now preferred over BWF. The reasons given are that DCS has relatively good access compared to BWF; that DCS would avoid work to the Thames Foreshore and the potential effects on residents, visitors and business amenity is less than the BWF site.
- 7.1.3 The traffic and access issues, including HGV issues, that will impact on DCS are set out below (paragraphs 7.7.1 – 7.7.7). As no traffic impact assessment has been provided by Thames Water it is difficult to accurately compare the two sites. The Council therefore require Thames Water to provide quantitative data on traffic issues including the cumulative impact on the highway network from the many regeneration schemes proposed and those already agreed in Lewisham and Greenwich. It also requires details of the access and egress proposals for HGV from BWF.
- 7.1.4 It is the Council's opinion that use of BWF has the great advantage over DCS in that spoil and material can be delivered and removed by use of the River Thames. This appears to be a much more sustainable solution than the use of DCS as it would reduce the number of HGV movements. It should also be noted that the primary aim of the Thames Tunnel project is to avoid sewage pollution entering the River Thames, therefore, use of the River during construction appears to be a price well worth paying.

- 7.1.5 The BWF site is located at the point where the CSO discharges into the River Thames. Intercepting the sewer at this point would capture the contents of the entire length of the sewer while intercepting the sewer further inland, would not capture a length of sewer, in this case from the Deptford Church Street site north to the River Thames. BWF would therefore capture more sewerage and is considered a more effective site in achieving the goal of reducing the amount of untreated sewerage discharged into the River Thames.
- 7.1.6 It is acknowledged that the River Thames is an important and valuable recreational, open space and ecological asset to London. However, DCS is a valuable open space; a designated site of nature conservation importance and further more is located within a conservation area and is adjacent to a grade 1 listed building. The balance of advantage between the two sites is therefore unproven and in the opinion of the Council would favour the choice of BWF as the preferred site.
- 7.1.7 As Thames Water have provided no data on the number of people, households and businesses affected at both sites it is difficult to see how the use of DCS over BWF is justified on these grounds. In addition the impact on St. Joseph's primary school at Deptford Church Street is direct and severe compared to any comparable community impact from the use of BWF. There are a number of businesses directly affected by the use of DCS while Borthwick Wharf and the adjacent Payne's Wharf are currently vacant.
- 7.1.8 The DCS site is located within a wider town centre environment which is currently benefitting from significant investment and regeneration. Spatial Policy 2 of the Lewisham's Core Strategy emphasises the importance of improving connectivity throughout the area for pedestrians and cyclists with the explanatory text providing further guidance in relation to the provision of open space through the implementation of the North Lewisham Links Strategy (2007). The recently completed links project from Deptford High Street through to Margaret McMillan Park, as well as work underway on Giffin Square, the Deptford Lounge, Tidemill Academy and Wavelengths demonstrate the implementation of the Council's strategic aspirations for the area.
- 7.1.9 The North Lewisham Links Strategy shows the importance of an improved east-west connection through the site, linking Deptford High Street through to the Laban Centre and Deptford Creek in the east. The completion of site works is not expected until 2021 and the site is not expected to become operational until 2022 which would result in an unacceptable delay to the delivery of the Council's strategic objectives for links to and connections through the area.

7.2 Ecology and Open space

- 7.2.1 Deptford Church Street is classified as a site of nature conservation importance in the adopted UDP and as such is protected by policy OS 12 'nature conservation on designated sites' and OS 13 'nature conservation'. If the borough were the local planning authority for this application it would either refuse permission that had adverse impacts on nature conservation or if development was considered essential

it would require an environmental appraisal that included methods of mitigation and proposals for compensation. At a minimum the Council considers Thames Water should provide this information.

7.2.2 The impacts identified by Thames Water include the loss of medium mature trees and the associated bird nesting potential as well as the loss of an area containing ruderal meadow species. These impacts are based upon a Habitat Survey carried out by Thames Water that is technically deficient in several areas. The survey lacks any detail; it was carried out in mid February which is a sub-optimal time of year for identifying any notable plant species. The survey judges that the site is species-poor and/or of limited intrinsic value and therefore of 'low' habitat value. This is a subjective and generalised assessment illustrated by the fact that it failed to identify notable species on site, such as, the fiddle dock (*Rumex pulcher*) which is a very scarce species in Lewisham. Furthermore no assessment has been made of the flora and fauna that might be associated with the historic wall. If the project is to go ahead, Thames Water must provide a detailed environmental appraisal, and details of the proposed mitigation and compensation in the final design.

7.2.3 The Crossfield Amenity Green will be made unavailable and inaccessible for an extended period (at least four years) during construction which will result in the loss of open space in an area with limited existing public open space. The development of Convoy's Wharf and a number of Mixed Use Employment Locations in Deptford (as identified in Lewisham's Core Strategy) are expected to begin delivering new housing next year with phased delivery through until 2022 (Convoy's Wharf is expected to be completed by 2027). This level of new development will place increasing pressure on the limited open space in the area and therefore maintaining access to this space in the coming years and beyond is an essential requirement.

7.3 Education

7.3.1 There are two Primary Schools close-by the proposed site; St Joseph's Roman Catholic Primary School is opposite the site and the new Tidemill Academy (due to be completed this year) is very near. In addition, students attending Addey and Stanhope School who live in the area may also have their journey to and from school affected. Officers have concerns about the effects of noise, vibration and dust on the school children.

7.3.2 The schools are located in Evelyn Ward which is a very deprived part of the borough and in the governments Index of Deprivation is recorded as amongst the 10% most deprived areas in England. The proposed works are for a four year period which represents the majority period of primary school attendance. It is considered that the potential impact on the education of children in an already deprived area is unacceptable and is sufficient reason not to use this site.

7.3.3 Fire evacuation for St. Joseph's during this period is a concern of both the school and the Council. The school requires an off-site space near the school that 260+ children and 25+ staff can reach quickly and safely. At present the school use the existing

green space for this purpose, which, under the current proposal, would no longer be possible as the entire space would be required for construction purposes.

- 7.3.4 The impact on children, teachers and parents from the HGV traffic servicing the sites also raises issues of safety that need to be addressed.
- 7.3.5 In addition to this there will be a severe impact on the life of the school and potentially on teaching and learning. Both indoor and outdoor learning will be impacted by noise and air quality. Children suffering from Asthma may be affected.
- 7.3.6 The proposed closure of the bus lane in Deptford Church Street will mean that children who travel to school by bus will face considerable disruption. It is likely to result in increased late arrival at school which will further disrupt lessons and impact on education.

7.4 Employment

- 7.4.1 The proposed works will impact on the existing businesses along Crossfield Street, particularly given that access, both vehicle and pedestrian, would be disrupted and restricted. It is unclear from the information provided what the level of impact would be on the surrounding businesses and if they would be able to remain operational. Further information is required to understand how the works would impact on the ongoing operation of the businesses and to understand how many employees would potentially be affected.
- 7.4.2 The site is within a town centre environment and is approximately 115 metres from Deptford High Street. Access disruptions from the relocation of bus stops on Deptford Church Street as well as the re-routing of pedestrians will adversely affect businesses in Deptford town centre, the borough's third largest centre after Lewisham and Catford.
- 7.4.3 Thames Water need to provide more detail on the potential impact on business and any proposals to mitigate the impact and provide compensation for those adversely affected.

7.5 Environmental Health

- 7.5.1 The impact of the construction noise to St Joseph's School has not been assessed and the impact on the staff and students as well as on the learning environment is concerning. A full assessment of the noise effects on the use of the school from the construction site is required.
- 7.5.2 The transport proposals are likely to cause significant congestion along Deptford Church Street which is concerning as it would result in an increase in concentrations of air pollutants and further information is required regarding the impacts and how these are going to be managed.

7.6 Heritage Assets and Conservation

- 7.6.1 The proposed site is located in a conservation area and is adjacent to the Grade I listed St. Paul's Church which is the single most significant listed building in the borough. There is a historic wall on the site that has been identified by the Council's Conservation Officer as being part of the rectory once attached to St Paul's and this will be destroyed or materially damaged as a result of the proposed works. The railway viaducts running along the southern boundary of the site are also listed.
- 7.6.2 Development of the area and significant shaft construction works raises concerns with regard to the temporary and permanent impact on the St Paul's Grade I listed church and churchyard boundary wall, the potential loss of protected trees and the impact on the listed railway viaduct. The site is within an area of archaeological priority and more information regarding the impact of the works is required, including an investigation of the significance of the asset and an assessment of the impact of the works on any potential archaeology.
- 7.6.3 The impact of the construction works on the structural integrity of the church and churchyard boundary wall as well as the impact of the final structures and landscaping on the setting of the church and the surrounding historic environment is of particular concern and further information is required in relation to how the works could effect the structure of the church and what mitigation is proposed.
- 7.6.4 English Heritage prefer Borthwick Wharf over Deptford Church Street as there would be less impact on heritage assets.

7.7 Transport

- 7.7.1 The proposal involves closing the two north-bound lanes along Deptford Church Street. The two south-bound lanes would then provide one lane in each direction, which would result in congestion and significantly disrupt the surrounding road network. No detailed traffic modelling has been undertaken by Thames Water so it is unclear at this stage how significant the impact would be. There could be emergency vehicle access restrictions associated with the traffic management measures along the proposed construction vehicle routes.
- 7.7.2 Bus lanes in both the north and southbound directions would be temporarily suspended however the width of the existing southbound carriageway is insufficient for two way traffic (to accommodate HGV's and buses), particularly as Deptford Church Street is on the borough's oversize vehicle route. Cyclists currently use the bus lanes on Deptford Church St and the proposed closure of the bus lanes would have highway safety implications. The closure of bus stops without the provision of temporary bus stops would have an impact on bus users that are less mobile, such as the elderly and disabled.
- 7.7.3 Construction traffic and the flow-on effects of reducing Deptford Church Street down to single lanes would significantly impact on the surrounding road network, particularly considering the cumulative effects from developments in the wider area coming on-stream at a similar time.

- 7.7.4 The proposed temporary suspension of all parking bays on Coffey Street and Crossfield Street for the duration of construction would have an impact on on-street parking in the surrounding streets as well as the drop off and collection associated with St Joseph's School. There would be an impact on the commercial units on Crossfield Street, particularly in relation to deliveries and servicing, as well as the parking for parishioners at St Paul's Church.
- 7.7.5 Pedestrian access along Deptford Church Street would be disrupted with pedestrians being diverted around the construction site. Crossfield Street only has a footway on the north side and closing this during the construction phase would force pedestrians to share the carriageway with construction vehicles, which would have highway safety implications. Similarly, the closure of the footway on the site boundary with Deptford Church Street would result in the loss of a pedestrian crossing on Deptford Church Street, which would have highway safety implications.
- 7.7.6 The construction vehicle movements would have a highway safety impact in Coffey Street, particularly for those accessing St Paul's Church and when the movements coincide with St Joseph's School arrival/departure times. Similarly, closing the westbound lane of Coffey Street would have an impact on drop off/collection associated with school and narrowing Crossfield Street would have an impact on the commercial units on Crossfield Street, particularly in relation to deliveries and servicing.
- 7.7.7 Swept path analysis has not been undertaken for the construction vehicle movements to demonstrate that there is there sufficient carriageway space for construction vehicles to manoeuvre and an assessment of sightlines has not been undertaken to illustrate visibility on the construction vehicle route. Poor visibility would have highway safety implications.

7.8 Design

- 7.8.1 As stated above the Council considers that Deptford Church Street is not an appropriate location for the CSO interception site. However, as the final decision on the site will not be made by Lewisham Council but by the IPC and Secretary of State, it is considered prudent to make comments on the design proposals for the site after construction. The views expressed on the proposed design of the permanent structures are made without prejudice to the Council's in principal objection to the use of the site.
- 7.8.2 The design of the site put forward does not adequately consider the adjoining uses, for example the school and church, and does not reflect the Council's strategic aspirations for the area, for example those detailed in the North Lewisham Links Strategy (2007).

Earl Pumping Station Site

7.9 Alternative Sites

- 7.9.1 No alternative sites are identified in the Phase 2 consultation. During Phase 1 consultation four alternative sites were identified, including the Foreshore adjacent to

the boat yard and Helsinki Square and the Council supported the use of this site over Earl Pumping Station. For the reasons set out in response to Phase 1 consultation, the Council still considers this alternative site to be more appropriate. Thames Water should therefore re-examine the use of this alternative site.

7.10 Employment

7.10.1 Thames Water identify that 24 employees are likely to be displaced, this is based on a calculated estimate rather than an assessment of the actual businesses in the area. More information is required regarding the actual effect on businesses and their employees and what proposals, if any, Thames Water propose to compensate and relocate those businesses which are affected.

7.11 Environmental Health

7.11.1 The impact of construction noise has not been assessed in relation to the proposed residential developments on surrounding and adjacent sites. These properties should be included in order to identify the full number of sensitive properties. The properties that have been assessed are identified as being within the London Borough of Southwark however the Croft Street residences are within the London Borough of Lewisham and should be identified as such.

7.11.2 The works producing the most noise will last for around 15 months of the 4 year construction period. Thames Water have identified the noise effects as being significant on all the residential properties assessed and the vibrations effects as being significant on many of the residential properties around the site. Mitigation may reduce the impact of these effects however the mitigation measures are not yet detailed.

7.11.3 The compaction works have been identified as giving rise to relatively high levels of exposure. Further information is required regarding the method and design for compaction works to reduce the noise and vibration impact.

7.11.4 Given that traffic volumes on the surrounding roads are relatively low, there is likely to be a noise impact when introducing construction traffic. A traffic assessment is required in order to understand the expected impact.

7.12 Transport

7.12.1 No traffic assessment has been carried out however it is clear that construction vehicle movements would have a significant impact on the residential properties in Yeoman Street, Chilton Street and Croft Street, particularly as they are quiet traffic calmed streets. The removal of traffic calming measures as a result of the proposal would lead to increased vehicles speeds which would have highway safety implications.

7.12.2 The removal of car parking bays along Plough Road, Yeoman Street and Croft Street to accommodate the construction vehicle movements would have an impact on on-street parking in the surrounding streets. It is unclear which parking bays are to be removed and if there are any proposals to relocate them.

7.12.3 Evelyn Street forms part of the proposed construction vehicle route, but the impact on the cycle superhighway along Evelyn Street has not been considered in the assessment.

7.12.4 The impact of construction traffic is a particular concern given the potential cumulative effects associated with the construction of other developments in the area, particularly the Council's Strategic Sites. A full transport assessment is required.

7.13 Design

7.13.1 The views expressed on the proposed design of the permanent structures are made without prejudice to the Council's in principal objection to the use of the site. The existing pumping station sits within a semi-industrial area however given the residential developments proposed and approved in the surrounding area, this setting will change dramatically. It is therefore important that the appearance of the existing site is enhanced, particularly the boundary treatment of the site. Pedestrian access on the western boundary, along Croft Street is poor and the footpath should be widened to enable its use. The strip of unused land at the southern end, adjacent to the existing terraces on Croft Street, is unusable.

8. Financial Implications

8.1 There are no direct financial implications arising from this report. The Council's Thames Tunnel consultation will be funded from within the agreed Planning Service budget.

9. Legal Implications

9.1 The applicant (Thames Water) must prepare a statement setting out how the applicant proposes to consult people living in the vicinity of the land. Before preparing the statement, the applicant must consult each local authority where the land falls within that authority's area about what is to be in the statement and must have regard to the responses. Once the applicant has prepared the statement, the applicant must publish it and must carry out consultation in accordance with the proposals set out therein (Section 47 of Planning Act 2008).

9.2 The Phase 2 consultation is part of the duty to consult process and is part of the pre-application consultation process. Thames Water have published a Statement of Community Consultation which sets out their approach and timetable for consulting all those with an interest in the proposed Thames Tunnel.

10. Crime and Disorder Implications

10.1 There are no direct crime and disorder implications arising from this report. The proposed works in Lewisham involve two construction sites that will be in operation for about four years. It will be necessary for Thames Water to make these sites secure and put in place measures to reduce the opportunity for crime.

11. Equalities Implications

- 11.1 This is a very large engineering project that will have considerable socio economic consequences including the impact on social and community infrastructure, local businesses and the local economy, as well as effects on local amenity. The two proposed sites in Deptford are located in Evelyn Ward which is one of the most deprived in Lewisham and amongst the 10% most deprived areas in England.
- 11.2 It does not appear that Thames Water have undertaken an Equality Analysis Assessment (EAA) as part of the Phase 2 consultation. The EAA process involves systematically analysing a proposed or existing policy or strategy to identify what effect, or likely effect, will follow from the implementation of the policy for different groups in the community. The assessment seeks to ensure that, as far as possible, any negative consequences for a particular group or sector of the community are eliminated, minimised or counterbalanced by other measures. The Council consider an EAA should be undertaken for this project.

12. Environmental Implications

- 12.1 This is a very large engineering project that will have considerable environmental impacts. The Phase 2 consultation includes preliminary environmental information reports on each proposed site. Much of the environmental information necessary to assess the impact has yet to be collected and will be necessary for the final Environmental Impact Assessment. The main body of the report deals with the need for Thames Water to provide more information to allow a proper environmental impact to be assessed.

13. Children and Young People's Implications

- 13.1 As stated in section 7 of this report the preferred site at Deptford Church Street is immediately opposite a primary school. The construction programme is for up to four years of work and this is the majority of a child's primary education period. This is the single most important adverse impact of the project on children and young people.

14. Sustainable Community Implications

- 14.1 Paragraph 3.1 set out the strategic objectives of the sustainable community strategy (SCS). The main body of the report has raised a great deal of concerns about the impact of the proposal on Lewisham. The adverse impacts on the open space, the conservation area, the town centre and traffic and environmental concerns all run contrary to the objectives of the SCS.

15. Conclusion

- 15.1 The Thames Tunnel project represents an opportunity to improve the environment by seriously reducing the amount of sewage pollution that is currently discharged into the River Thames. However, the preferred sites in Lewisham cause considerable concern to the council. No alternative to Earl Pumping Station is presented by

Thames Water and the Council considers that Thames Water should re-examine the alternatives suggested as part of their phase 1 consultation.

- 15.2 The alternatives to the preferred site at Deptford Church Street offered in the Phase 2 consultation are the Sue Godfrey nature reserve at Bronze Street and the former preferred site at Borthwick Wharf Foreshore. For the reasons set out in this report the council considers that the Borthwick Wharf site should be the preferred location for the SCO site.

16. Background documents and originator

Short Title Document	Date	File Location	File Reference	Contact Officer	Exempt
Planning Act 2008	2008	Laurence House	Planning Policy	Brian Regan	No
Infrastructure Planning Regulations	2009 & 2011	Laurence House	Planning Policy	Brian Regan	No

If you have any queries on this report, please contact Brian Regan, Planning Policy Manager, 5th floor Laurence House, 1 Catford Road, Catford SE6 4RU – telephone 020 8314 8774.