

Thames Tunnel
Thames Water Utilities
Freepost RSSB-HYRU-EGUT
35 King Street
Bristol
BS1 4DZ

Janet Senior
Executive Director for Resources &
Regeneration
1st Floor, Town Hall
Catford
London SE6 4RU

direct line 020 8314 8013
fax 020 8314 3127
janet.senior@lewisham.gov.uk
date 06/02/2012
our reference S/25/40/thames tunnel
your reference

Dear Sir/Madam

Re: Thames Tunnel Phase Two Consultation

Thank you for consulting the London Borough of Lewisham on the preferred route and sites for the Thames Tunnel. Please find attached the London Borough of Lewisham's response to this phase two consultation.

If you have any questions regarding this matter please contact my colleagues Brian Regan, Planning Policy Manager, direct line 020 8314 8774 or Claire Gray, Senior Policy Planner, direct line 020 8314 7186.

Yours sincerely

Janet Senior
Executive Director for Resources & Regeneration

1. Introduction

- 1.1 The London Borough of Lewisham objected to the proposed use of Earl Pumping Station as part of the phase one consultation (letter dated 12/01/2011) and to the use of Deptford Church Street as one of the sites identified after phase one consultation (letter dated 29/07/2011). For the reasons set out below, Lewisham continues to strongly object to the proposed use of Earl Pumping Station and Deptford Church Street as combined sewer overflow interception sites.

2. Council Consultation Arrangements

- 2.1 The Council wished to fully understand local concerns in relation to both sites and therefore undertook a consultation exercise, collecting written comments and views expressed at two public meetings, one focused on each site. The views expressed by the public during this consultation exercise have informed the Council's response to the phase two consultation and are outlined briefly below.
- 2.2 Comments received in relation to Earl Pumping Station were generally supportive of the Thames Tunnel project as a whole with questions asked relating to engineering aspects, traffic impact, compensation for properties in close proximity and control of odour emissions.
- 2.3 Comments received in relation to Deptford Church Street oppose the use of the site and 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.

3. Deptford Church Street Site

3.1 Alternative Sites

- 3.1.1 Borthwick Wharf Foreshore (BWF) was the preferred site during the phase one consultation. For the phase two 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. Thames Water should provide data for comparison as part of the full EIA which will be necessary to accompany any planning application to the IPC.
- 3.1.2 The phase two 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. Although avoiding work to the Thames Foreshore is cited as a reason for not using BWF, the site selection assessment for a majority of the sites favours sites in close proximity to the River and with available jetty/wharf facilities.
- 3.1.3 The traffic and access issues, including HGV issues, that will impact on DCS are set out below (paragraphs 3.9.1 – 3.9.8). 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. The Council also require details of the access and egress proposals for HGV from BWF.
- 3.1.4 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.
- 3.1.5 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 leave a length of sewer un-captured, 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.

- 3.1.6 Consideration should also be given to the use of Payne's Wharf as it is a brownfield site and has the advantage of being a foreshore site with access to the River Thames for transportation of spoil and materials. Road access to Payne's Wharf may also impact on less residential properties.
- 3.1.7 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.
- 3.1.8 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.
- 3.1.9 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.
- 3.1.10 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 the Thames Tunnel 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.

3.2 Ecology and Open space

- 3.2.1 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.

- 3.2.2 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 demonstrating that there are no negative impacts on the ecological value of the area in line with Core Strategy Objective 7 and Core Strategy Policy 12.
- 3.2.3 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. This loss of open space is contrary to Core Strategy Objective 7 and Core Strategy Policy 12.

3.3 Education

- 3.3.1 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.
- 3.3.2 The schools are located in Evelyn Ward which is a very deprived part of the borough and in the government's Index of Deprivation is recorded as amongst the 10% most deprived areas in England. The proposed works are for at least a four and a half 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.

- 3.3.3 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.
- 3.3.4 The impact on children, teachers and parents from the HGV traffic servicing the sites also raises issues of safety that need to be addressed.
- 3.3.5 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.
- 3.3.6 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.
- 3.3.7 Thames Tunnel need to demonstrate how the proposed works can take place without adverse effects to the operation, safety of children and teachers, and the learning environment at the school.

3.4 Employment

- 3.4.1 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 on-going operation of the businesses and to understand how many employees would potentially be affected.
- 3.4.2 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.
- 3.4.3 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.

3.5 Noise

- 3.5.1 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.

- 3.5.2 The PEIR identifies a relatively small number of receptors (under 100) and identifies residential uses as being of high sensitivity, but consider both St Paul's church and St Joseph's Primary School as medium sensitivity. Given the very close proximity of St Joseph's Primary School to the works site, the school should be identified as a high sensitivity site. The hours of work for the construction are during the school hours and therefore children and teachers could be exposed to noise for longer periods than a residential property where the occupiers may be out during the day.
- 3.5.3 There is growing evidence linking detrimental effects on child learning to high levels of ambient noise. While many of the studies focus on noise from aircraft and road traffic, the principle of long term noise exposure also applies to a long-term construction site where the maximum noise levels are likely to be higher.
- 3.5.4 Building Bulletin 93, published in 2003, provides important assessment criteria that, although it is primarily written for the design of new school buildings to create environments conducive to learning, contains noise limits, derived through research, that should be reviewed against any assessment of the construction impacts at this site.
- 3.5.5 The BB93 states: 'For new schools, 60 dB LAeq,30min should be regarded as an upper limit for external noise at the boundary of external premises used for formal and informal outdoor teaching, and recreational areas' and 'Noise levels in unoccupied playgrounds, playing fields and other outdoor areas should not exceed 55 dB LAeq,30min and there should be at least one area suitable for outdoor teaching activities where noise levels are below 50 dB LAeq,30min. If this is not possible due to a lack of suitably quiet sites, acoustic screening should be used to reduce noise levels in these areas as much as practicable, and an assessment of predicted noise levels and of options for reducing these should be carried out.'
- 3.5.6 It also quotes an LAeq (30min), 35dB for indoor ambient noise levels upper limit within a Primary School classroom. The WHO Guideline for Community Noise, also defines a level of 35dB over the classroom period and defines the critical health effects as speech intelligibility, disturbance of information extraction and message communication.
- 3.5.7 If the assessment results in a significant increase to the BB93 levels then as a minimum it would be expected that within a Part B COCP, there should be a commitment to the following:
- 3.5.8 Levels of 65 dB LAeq,1h and of 70 dB LAeq,1minute will apply as measured at 1 metre from the façade of the building during school hours and in term time. If these limits are predicted to be exceeded for at least ten school days out of any period of fifteen consecutive days or alternatively 40 school days in any 6 month period, then changes to the work programme in maximising the work during school holidays will be applied so these limits can be maintained.

3.5.9 A full assessment of the noise effects on the use of the school from the construction site is required and unless it can be demonstrated that the impacts of the proposal can be satisfactorily mitigated, the proposal will be contrary to Lewisham's retained UDP policy ENV.PRO11 which seeks to resist development that would lead to unacceptable levels of noise.

3.6 Air Quality

3.6.1 The DCS site is located within an air quality management area and therefore Thames Water will be expected to demonstrate that proposals do not result in a reduction in air quality, as set out in Core Strategy Policy 9 and the Lewisham Air Quality Action Plan (2008). The impacts of the construction/excavation activities and the HGVs using the site is likely to result in an increase in particulate matter. The transport proposals are likely to cause significant congestion along Deptford Church Street which is concerning as it would result in an increase in particulates (PM) and Nitrogen dioxide (NO₂). While NO₂ baseline monitoring has been carried out in the area, no monitoring or modelling data has been provided and therefore further information is required about the impact of PM and NO₂ and how these impacts will be managed and mitigated.

3.7 Heritage Assets and Conservation

3.7.1 The proposed site is located within St Paul's 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 an 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 would 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.

3.7.2 The proposed shaft and associated building works directly affect the setting and structure of the Grade I listed church, the boundary wall to the church cemetery, which is listed in its own right (Grade II), and the Grade II listed railway viaduct to the south.

3.7.3 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. Thames Water should provide further information in relation to how the works will affect both the structural integrity of the church and the setting and what mitigation is proposed.

3.7.4 The run of the sewer affects buildings and structures within three conservation areas: Deptford High Street, St. Pauls and the proposed Deptford Creekside Conservation Area. The Grade II listed 227 Deptford High Street is directly affected as is the listed railway viaduct where it crosses the Creek.

3.7.5 There is a lack of information regarding the impact during construction work for all the above mentioned heritage assets.

3.7.6 Failure to identify all adverse effects and demonstrate that, with adequate mitigation, the heritage and conservation value of the area would not be harmed would be contrary to Core Strategy Objective 10, Spatial Policy 1, Policies 15 and 16.

3.7.7 English Heritage prefer Borthwick Wharf over Deptford Church Street as there would be less impact on heritage assets.

3.8 Archaeological priority zone

3.8.1 The site is within an area of archaeological priority. An archaeological assessment is required including an investigation of the significance of the asset, an assessment of the impact of the works and details of any mitigation measures. In accordance with Lewisham's Core Strategy Objective 10 and Policies 15 and 16, development must conserve and enhance all heritage assets with archaeological interest. Failure to demonstrate adequate mitigation of impacts would be contrary to Lewisham's planning policies.

3.9 Transport

3.9.1 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. It is unclear at this stage how significant the impact would be as no detailed traffic modelling has been undertaken. There could be emergency vehicle access restrictions associated with the traffic management measures along the proposed construction vehicle routes.

3.9.2 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.

3.9.3 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.

3.9.4 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.

- 3.9.5 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.
- 3.9.6 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.
- 3.9.7 Swept path analysis has not been undertaken for the construction vehicle movements to demonstrate that there is 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.
- 3.9.8 Unless further information is provided demonstrating that the impacts of the proposal can be satisfactorily mitigated, the proposal would be contrary to Core Strategy Policy 14.
- 3.10 Design
- 3.10.1 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.
- 3.10.2 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). The Council considers that considerable further work is required on the design of the open space and any permanent structures.

4. Earl Pumping Station Site

4.1 Alternative Sites

- 4.1.1 No alternative sites are identified in the phase two consultation. During phase one 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 one

consultation, the Council still considers this alternative site to be more appropriate. Thames Water should therefore re-examine the use of this alternative site and provide a written explanation for any choice made.

4.2 Employment

- 4.2.1 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. Further 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.

4.3 Noise

- 4.3.1 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.
- 4.3.2 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. Further information regarding any proposed mitigation is required.
- 4.3.3 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.
- 4.3.4 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.
- 4.3.5 A full assessment of the noise and vibration effects on the existing and proposed residential properties is required and unless it can be demonstrated that the impacts of the proposal can be satisfactorily mitigated, the proposal will be contrary to Lewisham's retained UDP policy ENV.PRO11 which seeks to resist development that would lead to unacceptable levels of noise.

4.4 Air Quality

- 4.4.1 The site is located within an air quality management area and therefore Thames Water will be expected to demonstrate that proposals do not result in a reduction in air quality, as set out in Core Strategy Policy 9 and the Lewisham Air Quality Action Plan (2008). The air quality impacts arising from traffic and construction/excavation activities are concerning and further information is required about the impacts and how these will be managed and mitigated.

4.5 Transport

- 4.5.1 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.
- 4.5.2 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. Clarity on this issue is required.
- 4.5.3 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 and should be.
- 4.5.4 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.
- 4.5.5 Unless further information is provided demonstrating that the impacts of the proposal can be satisfactorily mitigated, the proposal would be contrary to Core Strategy Policy 14.

4.6 Design

- 4.6.1 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.
- 4.6.2 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.

5. **Equalities Implications**

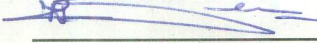
- 5.1 This is a very large engineering project that will have considerable socio economic consequences including the impact on social and community infrastructure, local businesses and the local economy, as well as effects on local amenity. The two proposed sites in Deptford are located in Evelyn Ward which is one of the most deprived in Lewisham and amongst the 10% most deprived areas in England.

5.2 It does not appear that an Equality Analysis Assessment (EAA) has been undertaken as part of the phase two 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.

6. Conclusion

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

6.2 The alternatives to the preferred site at Deptford Church Street offered in the phase two 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 CSO site.

Signed: 
Executive Director for Resources & Regeneration

Date: 08-02-2012