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our reference S/25/40/thames tunnel

Dear Sir/Madam

Re: Thames Tideway Tunnel section 48 publicity response

Thank you for consulting 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 the section 48 publicity. The Mayor of Lewisham approved this response at his Cabinet meeting held on 3rd October 2012.

At a late date in the consultation period further transport information was provided, however, this was received too late in the process to be reflected in this response. The Council will respond to this new information as soon as is practicable.

If you have any questions regarding this matter please contact me or my colleague Claire Gray, Senior Policy Planner, direct line 020 8314 7186.

Yours sincerely

Brian Regan
Planning Policy Manager

Introduction

- 1.1 The London Borough of Lewisham objects to both Deptford Church Street and Earl Pumping Station as combined sewer overflow interception sites as identified by Thames Tideway Tunnel in their section 48 publicity. The reasons for objection are set out below and build on objections submitted at both phase one and phase two consultation.

Deptford Church Street Site

1.2 Alternative Sites

- 1.2.1 Borthwick Wharf Foreshore (BWF) was the preferred site during the phase one consultation. For the phase two consultation Deptford Church Street (DCS) was the preferred site and BWF together with the Sue Godfrey Nature Reserve, Bronze Street, were put forward as alternative sites. No information has been made available as to why Thames Water consider Deptford Church Street to be a more suitable site.
- 1.2.2 The early site selection assessment and weighting exercises do not include quantitative data. Qualitative assessments were carried out by Thames Tunnel staff who used their professional judgement to evaluate the sites. No technical studies or data were available for comparison at site selection stage.
- 1.2.3 The section 48 report on site selection process, outlines that after phase one consultation Thames Tunnel carried out 'more technical studies, which suggested that the use of our preferred site at Borthwick Wharf Foreshore might not be the best solution', (Section 5, Appendix U, paragraph U.3.9). However the only published information on a 'technical study' is the reference to the Thames Water multi-disciplinary team appraisal and no details of this discussion are published to allow others to consider whether it is appropriate.
- 1.2.4 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.
- 1.2.5 The traffic and access issues, including HGV issues, that will impact on DCS are set out below (section 1.11). As no traffic impact assessment has been provided by Thames Water it is impossible 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.

- 1.2.6 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.
- 1.2.7 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.
- 1.2.8 Consideration should also be given to the use of Payne's Wharf as it 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.
- 1.2.9 DCS is a valuable open space; a designated site of nature conservation importance and furthermore is located within a conservation area and is adjacent to a grade 1 listed building. It is acknowledged that the River Thames is an important and valuable recreational, open space and ecological asset to London however it is considered that the balance of advantage between the two sites is unproven by Thames Water and in the opinion of Lewisham Council clearly favours BWF.
- 1.2.10 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 DCS is direct and a major adverse impact compared to any comparable community impact from the use of BWF.
- 1.2.11 The advantages of DCS over BWF and Payne's Wharf is not clear and therefore all three sites should be included in the Development Consent Order and submitted to the Planning Inspectorate in order for a decision to be taken.
- 1.2.12 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.

1.2.13 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, as set out in the adopted Core Strategy and further detailed in the North Lewisham Links Strategy. The proposed works would undermine the objectives of both these documents.

1.3 Ecology

1.3.1 Deptford Church Street is classified as a site of nature conservation importance in the saved UDP policies 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 likely refuse permission due to the adverse impacts on nature conservation or if recommended for approval would require an environmental appraisal that included methods of mitigation. At a minimum the Council considers Thames Water should provide an environmental appraisal that includes methods of mitigation.

1.3.2 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, in officer's opinion technically deficient in several areas. 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 crossing the green space. 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.

- 1.3.3 The report on phase 2 consultation does not identify or respond to LBL objections regarding the survey methodology and presence of notable species. This report does however state (page 406) that in relation to operational effects surveys have been completed and mitigation measures have been developed. LBL have not seen or reviewed the surveys and it is therefore uncertain whether or not the surveys have responded to LBL's areas of concern and incorporated LBL's suggestions. LBL request a copy of any updated surveys and survey methodology. The section 48 Project description and environmental information report (page 219) is very narrow in its focus, only referring to bat species, and does not refer to the impact on plant species.
- 1.3.4 Without a full ecological assessment, including a full assessment of mitigation measures, TTT can not reasonably assert that "the scheme is not expected to have any detrimental effects on ecology" (Main report on phase two consultation, page 406). TTT have failed to identify notable species on site, have not provided an impact assessment and have not proposed any mitigation. Therefore significant effects have not been considered and the project should not progress until the impact of the development and the level of proposed mitigation is known and shown to be acceptable.
- 1.4 Open Space and Regeneration
- 1.4.1 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. However it is a pivotal space in the Council's growth and regeneration strategy.
- 1.4.2 The area is one of major growth and significant developments have already been delivered as part of the Core Strategy objectives. 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). 38 homes have already been delivered in Deptford, Tidemill Academy (a school with 420 places) and Deptford Lounge community centre has been opened and major regeneration proposals in the form of the New Deptford Station, The Deptford Project (132 homes, public space and commercial space) and 400 further homes are committed or expected immediately south of the rail line around Giffin Street. A further 150 residential units and 4,000 sqm of commercial space would be provided to the east on Creekside.

- 1.4.3 Crossfield Amenity Green is the closest open space to the new development and the Council has longer term aspirations to open up the rail arches linking directly to the space, as a pivotal part of its Links Strategy that would also join Margaret McMillan and Fordham Park to Deptford and the wider area.
- 1.4.4 The level of new development in the surrounding area will place increasing pressure on the limited remaining open space 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.
- 1.4.5 The type of alternative open space in the immediate area is not comparable. The PEIR (Vol 25, para 10.5.7) refers to space at St Paul's Churchyard and Sue Godfrey Nature Reserve however these are not green open spaces that could be used in similar ways as the Crossfield Amenity Green. The PEIR (Vol 25, para 10.5.8) states that the same types of activities could take place within these alternative spaces. This is not accurate as Sue Godfrey Nature Reserve is, as the name suggests, a nature reserve with paths through and limited potential for other forms of recreation. Similarly the Church yard is a sensitive, enclosed environment with a graveyard which would not be an appropriate setting for some recreational activities.
- 1.4.6 The effects from closure of this park on surrounding open spaces has not been considered. There will be particular issues with dog fouling. At present contractors maintain and clean up Crossfield Amenity Green whereas there is no contract for the management of Sue Godfrey Reserve. There will be an increased impact on the nature reserve which is a very different kind of space to manage and maintain and for which there is no budget. Mitigation is required.
- 1.4.7 The section 48 material states that the loss of the open space on users is considered to result in negligible effects (Project description and environmental information report, page 222). The PEIR (Vol 25, para 10.5.9) considers that the loss of the open space 'minor adverse and therefore not significant' however it is stressed that the assessment is a 'preliminary and outline finding only at this stage'. The consultation report states that a comprehensive assessment of the likely significant effects arising from the proposals will be undertaken and included in the application. TTT must make available to LBL a full assessment of all sites and uses, not just those impacts identified as 'significant' in the PEIR.

1.5 Education

- 1.5.1 There are two Primary Schools close-by the proposed site; St Joseph's Roman Catholic Primary School is opposite the site and the newly opened Tidemill Academy 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 traffic, noise, vibration and dust on the school children.

- 1.5.2 The schools are located in Evelyn Ward, one of the 10% most deprived areas in England (Index of Multiple Deprivation). 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.
- 1.5.3 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. A suitable alternative is yet to be agreed.
- 1.5.4 The proposed fire evacuation area to the rear of the Church, adjacent to Deptford Church Street, as shown in the section 48 publicity (Book of plans – section 21, construction phases – phase 1 & 2) is approximately 120 metres from the school. The distance from the school severely impacts on the roll call to ensure everybody is accounted for as the roll call can not occur until all children and staff have reached the area. It is estimated that this will exceed ten minutes. The fire brigade are likely to arrive before this, yet it will not have been ascertained whether or not everyone is accounted for.
- 1.5.5 The impact on children, teachers and parents from the HGV traffic servicing the sites also raises issues of safety that need to be addressed. A safety audit is required to demonstrate safe routes are available for children to access school and move through the surrounding area.
- 1.5.6 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.
- 1.5.7 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.
- 1.5.8 The section 48 Transport Strategy (page 7) states that work will take place over a five-day week, rather than 7-days as previously proposed. This has the effect of aligning all working days with school days which will compound the impact of the works on school children and teachers and may adversely effect the learning and teaching environment for the duration of the project. The Main report on phase two consultation (page 408) acknowledges that the

working hours coincide with the hours of a number of other facilities and services and states that TTT will aim to minimise negative effects. Proposing a five-day week does not support this.

- 1.5.9 In response to socio-economic concerns made at phase 2 consultation, particularly regarding the impact on the school and education, TTT state (Main report on phase two consultation, page 414) that the assessment of effects is based on a methodology that has been agreed with LBL. This is not the case and LBL have **not** agreed to assessment methodologies.
- 1.5.10 The response also states that the site selection process included an assessment of the shortlisted sites against five 'community' considerations to help determine their suitability. A detailed assessment against these five considerations for the Deptford Church Street site has not been made available however the section 48 Report on site selection process broadly outlines the Thames Tunnel judgement reached when a back-check of the shortlisted sites was carried out. This judgement grouped socio-economic and community concerns (Volume 5, Appendix U, paragraph U.3.40) and considered the site 'less suitable' as it is likely that there would be some noise and visual disruption to the school.
- 1.5.11 No further assessment has been carried out and the section 48 Project description and environmental information report very briefly (para 21.3.28, page 222) looks at socio-economic effects and states that there are considered to be moderate adverse effects on pupils at St Joseph's Primary School. As outlined in the PEIR, the overall impact on the school is significant, particularly in relation to noise. TTT stress that this is a preliminary finding.
- 1.5.12 LBL consider that inclusion of this site based on preliminary findings and the judgement of TTT staff is not acceptable and therefore a further detailed assessment is required, particularly in accordance with the details set out in the section 1.7 Noise below.
- 1.5.13 Thames Tunnel have not demonstrated 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.

1.6 Employment

- 1.6.1 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 by TTT what the level of impact would be to the surrounding businesses and if they would be able to remain operational.

- 1.6.2 There are five businesses located on Crossfield Street. Cumulatively the businesses estimate upward of 25 cars, 20 vans and 15 lorries visiting per day. Each business has specific access requirements and each business said it was crucial to their on-going operations that access and parking is maintained. If access and parking is not maintained the businesses will experience significant adverse effects and the viability of the business would be undermined in an area with high levels of deprivation.
- 1.6.3 Some businesses are visited by large, articulated lorries, parking for up to half a day, other businesses deal with large fragile items that can not be easily moved or carried for long distances. All businesses receive frequent deliveries to their premises and these vehicles use Crossfield Street as a set down area while they pick up and drop off goods. Crossfield Street is used for parking by staff, customers, contractors and delivery vehicles.
- 1.6.4 It is clear that any disruption to access or parking will severely impact on these businesses and will compromise their on-going operations. They provide crucial local employment in an area where unemployment figures are higher than the overall figures for the borough and Great Britain as a whole. The site is located in Evelyn Ward and is adjacent to New Cross where the unemployment figures are consistently higher than the London Average. The ONS Claimant Count August 2012 shows that the percentage of people claiming job seekers allowance was 10% in Evelyn Ward and 9.9% in New Cross Ward, compared to 7.5% for Lewisham and 6.2% for Greater London. In an area with consistently high unemployment rates, the loss of these businesses would have a significant adverse impact on local people and the local economy.
- 1.6.5 The assessment included in the PEIR is incorrect. The project will clearly cause disturbance to the businesses and the businesses should have been further considered in the socio-economic impact assessment (PEIR, page 126). LBL commented in relation to this at phase 2 consultation and requested that further information was made available 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.
- 1.6.6 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 effect businesses in Deptford town centre, the borough's third largest centre after Lewisham and Catford.
- 1.6.7 At phase 2 consultation Thames Water were asked to provide more detail on the potential impact on business and any proposals to mitigate the impact and provide compensation for those adversely affected.

- 1.6.8 The main report on phase two consultation does not provide any further clarity, instead referring back to the incorrect assessment included in the PEIR and stating that “no preliminary assessment of business effects was scoped in as it was agreed with the local authority that there would be no effect” (Main report on phase two consultation, page 418). Again, this has **not** been agreed by LBL. LBL clearly objected to the inadequacy of the information provided at phase two consultation and requested a detailed assessment be undertaken.
- 1.6.9 Furthermore, the Main report on phase two consultation, page 400 states that “as set out in appendix U of the Phase two scheme development report, we do not consider that our proposals would have a likely significant effect on commercially established areas”. Appendix U does not set out or assess the impact on commercial, business or town centre areas.
- 1.6.10 As an assessment of effects on business was ‘scoped out’ at the PEIR stage, no further consideration has been given to the impact on businesses in the section 48 Project description and environmental information report (page 221-222). The ‘scoping out’ decision was made incorrectly and an assessment of the impact on the businesses should be undertaken.
- 1.6.11 The adverse effect on businesses from the project would be major and therefore adequate arrangements for the continued smooth operation of the businesses is required. If the project is to go ahead mitigation and/or compensation are required.
- 1.7 Noise
- 1.7.1 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.
- 1.7.2 The section 48 material states (page 221) that significant noise effects associated with construction are predicted at St Pauls Church. The noise effects on other receptors are not discussed in the section 48 material however PEIR report showed different information and different levels of significance (PEIR, vol 25, section 9). The consultation report states that a full assessment will be included with the DCO application (Main report on Consult – pg 411) and that the assessment methodology will be in line with BS5228, BS6472 and BS7385. LBL, in response to phase 2 consultation, stated that BB93 should be used in the assessment relating to the school. This has not been undertaken and, furthermore, the main report on phase 2 consultation incorrectly states (pg 411) that LBL have agreed to TTT methodology. LBL have **not** agreed to TTT methodology in this respect.

- 1.7.3 The PEIR identifies a relatively small number of receptors (under 100) and identifies residential uses as being highly 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.
- 1.7.4 The section 48 material introduces a 5-day working week (Monday – Friday), rather than previous proposals of a 7-day working week. This has the effect of aligning all working days with school days which could compound the impact of noise on school children and teachers and may adversely effect the learning and teaching environment for the duration of the project.
- 1.7.5 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.
- 1.7.6 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.
- 1.7.7 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.' LBL would expect these standards to be met and appropriate conditions included in the development consent order, or legal agreement, as appropriate.
- 1.7.8 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.

1.7.9 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:

- Levels of 65 dB LAeq,1h and of 70 dB LAeq,1 minute 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.

1.7.10 The Code of Construction Practice Part A, 6.3.3 indicates that mitigation and action in relation to noise insulation or temporary re-housing will be considered but no clear indication is given as to the criteria being adopted.

1.7.11 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.

1.8 Air Quality

1.8.1 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.

1.8.2 TTT have not yet demonstrated that the proposals will not result in a reduction in air quality. Approximately 11,000m³ of excavated material is proposed in order to create a 48m deep shaft. In addition, TTT estimate that there will be an average of 9 additional HGV movements per day reaching a maximum of 32 additional HGV movements per day during the peak period which lasts for seven months. These will give rise to increases in particulate emissions and will need to be appropriately managed and mitigated.

1.8.3 The section 48 material (Project description and environmental information report, page 218-219) concludes that mitigation measures are not required, however a full assessment has not been undertaken and the effects are

unknown. Dispersion modelling has not been undertaken and therefore the impact of particulates and nitrogen dioxide is unknown as is how the impacts will be managed and mitigated. It is premature to state that the adverse effects on air quality from construction are likely to be minor at the residential properties and school, and negligible at the church, commercial/office premises, playground and leisure centre (Project description and environmental information report, page 218-219).

- 1.8.4 While the Main report on phase two consultation (page 407) states that TTT are preparing a full assessment for submission as part of the DCO application which will include dispersion modelling, at this stage it has not been undertaken and the results from the modelling have not been made available. LBL do not have any information regarding the air quality model to be used - ADMS or equivalent should be used.
- 1.8.5 Information is required for both the construction and operational phases in relation to:
- What are the impacts in terms of changes to concentrations of pollutants?
 - How have these impacts been assessed?
 - Who will be affected?
 - Can they be mitigated?
 - What are the proposed mitigation measures?
 - Have alternatives been considered and, if so, how does the data compare?
- 1.8.6 TTT should assess in the modelling the cumulative impacts at each location. The additional traffic movements, not just from each site but the total additional vehicle movements generated by the project as a whole, as well as factoring in the congestion created by changes to road layouts should be assessed in the modelling.
- 1.8.7 The Main report on phase two consultation (page 407) states that TTT have assessed the air quality, traffic and residential amenity of the proposed development, based on a methodology that has been discussed and agreed with the local authority. The air quality methodology has not been agreed by LBL. Discussions have been limited to the suitability of monitoring locations and the locations of sensitive receptors. Following these discussions the proposed monitoring regime was agreed however this is only one part of the assessment of air quality. The methodology will include what is going to be assessed (pollutants / sources), where, how and any variations between different phases. Invariably this is done using an air quality model which relies on data inputs. The monitoring data is one of the inputs. However, the model to be used and other inputs such as met data and the years will also need to be agreed.

1.8.8 At this stage there is insufficient information to demonstrate that the impacts of the proposal can be satisfactorily mitigated, the proposal is contrary to Core Strategy Policy 9 and therefore the proposal should not progress.

1.9 Heritage Assets and Conservation

- 1.9.1 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.
- 1.9.2 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.
- 1.9.3 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. Information is required in relation to how the works will affect both the structural integrity of the church and the setting and what mitigation is proposed. The Grade II listed 227 Deptford High Street is directly affected as is the listed railway viaduct where it crosses the Creek.
- 1.9.4 The run of the sewer and works sites is likely to affect buildings and structures within three conservation areas: Deptford High Street, St. Pauls and Deptford Creekside Conservation Area (now adopted). LBL identified these three conservation areas in the phase 2 response however this was not addressed in TTT's main report on phase 2 consultation and has not been included in section 48 material. The impact of the proposals on buildings, structures and the conservation areas is yet to be assessed and has not been included in the s48 publicity. The construction works will adversely impact on all three Conservation Areas and once operational the final design and above ground structures are likely to adversely impact on the Conservation Areas. Assessment of all heritage assets is required.
- 1.9.5 The section 48 material (Project description and environmental information report, page 220-222) states that, in relation to townscape there would be a major adverse effect on townscape character areas at the site and St Paul's CA. It also states that in relation to the setting of St Paul's CA and St Paul's Church, there would be moderate adverse impact during construction for which no mitigation is possible and moderate positive impact following completion of works. The construction phase is expected to last for at least 4

years which is an unacceptably long period given the impacts and the fact that no mitigation is possible.

- 1.9.6 Pages 408-409 of the Main report on the phase two consultation states that “The scheme has been designed to preserve and enhance the character of the existing conservation area, and the setting of the listed church. An assessment of the likely significant effects on the historic environment is being completed as part of our environmental impact assessment...The findings of the assessment, together with any recommendations for mitigation, will be available as part of the Environmental statement that will be submitted with our DCO application”.
- 1.9.7 The scheme will not preserve or enhance the character of the conservation area or the setting of the church as the extent of landscaping is limited to a small area (zone within which required landscaping would be located, as shown on s48 Site works parameter plan) which will result in a disconnect between any landscaping and the setting of the conservation areas and the church itself. Proposals for landscaping need to fully consider and respond to the setting of the conservation areas and the setting of the Church and churchyard. The phase 2 material (proposed landscape plan, book of plans and the site information paper) showed landscaping extending beyond the landscape area shown in the s48 material and crucially the landscaping is shown as extending up to the listed church wall.
- 1.9.8 The lack of a full assessment for all heritage aspects and the minimal and isolated landscaping area means that there is no certainty regarding the beneficial aspects of the lasting design in relation to heritage considerations as asserted in paragraph 21.3.20 of the section 48 Project description and environmental information report.
- 1.9.9 The works site and landscaping can not be assessed and addressed in isolation. It must respond to, and conserve and enhance the surrounding heritage assets.
- 1.9.10 Failure to identify all adverse effects and demonstrate that, with adequate mitigation, the heritage and conservation value of the area would not be harmed is contrary to Core Strategy Objective 10, Spatial Policy 1, Policies 15 and 16. The proposed works are also contrary to Government guidance on protecting heritage assets as set out in the National Planning Policy Framework.
- 1.9.11 English Heritage prefer Borthwick Wharf Foreshore over Deptford Church Street as there would be less impact on heritage assets.

1.10 Archaeological priority zone

1.10.1 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.

1.11 Transport

1.11.1 The use of this site is based on the assumption that the two north-bound lanes along Deptford Church Street will be closed. 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. The transport impacts associated with the construction phases of the development is likely to be significant along the proposed construction vehicle routes. 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 and associated issues with accessing businesses, the school and the church in case of an emergency.

1.11.2 The main report on phase two consultation (page 404) says that TTT will 'consider whether closure of two lanes of Deptford Church Street (A2209) could be carried out without significant adverse traffic effects'. TTT should not have selected this as a preferred site without an assessment showing the adverse impact on the road network is minor and manageable. If the assessment shows that significant adverse effects will arise it is unlikely that these effects can be mitigated.

1.11.3 LB Lewisham have not been provided with details of what methodology was/will be used in assessing the effects. In addition, the methodology used for assessing the effects haven't been discussed or agreed with LB Lewisham. Furthermore, details of alternative site access options (for vehicles entering and leaving the site) haven't been considered. Thames Tideway Tunnel should consider alternative access arrangements that are less disruptive and safer for pedestrians and cyclists on roads and footpaths surrounding the site.

1.11.4 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.

- 1.11.5 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.
- 1.11.6 The proposed temporary suspension of all parking bays on Coffey Street and Crossfield Street for the duration of construction would displace existing on-street parking and would have an impact on 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 and visitors at St Paul's Church.
- 1.11.7 TTT's main report on phase two consultation (page 415) states that they are 'currently considering options for alternative parking and will discuss these with the local authority'. LB Lewisham would welcome details of alternative parking options as none have been discussed to date and no methodologies in relation to the assessments have been discussed or agreed.
- 1.11.8 LB Lewisham have **not** agreed a methodology for the assessment of TTT proposals at Deptford Church Street on local businesses, as stated in the main report on phase two consultation (page 415). The impact on St Joseph's primary school users, the Church and the impact on commercial units on Crossfield Street (particularly in relation to deliveries and servicing) has been not been assessed.
- 1.11.9 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.
- 1.11.10 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. The proposal to reduce the operating/delivery days/times (from 7 days to 5 days) would result in an increase in the number of trips per day (construction vehicle movements) adjacent to the school and would increase the potential for conflict at 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.

- 1.11.11 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.
- 1.11.12 The impact of the development on various user groups is stated in the s48 material as moderate adverse effects on the road network and pedestrians and a minor adverse effect on the bus network and cyclists. This is based on qualitative judgement and does not include any quantitative assessment (PEIR, vol 25, section 12). The lack of quantitative assessment was raised in LBL's phase 2 response and while the consultation report (pages 404-405) acknowledges that the full assessment is yet to take place and therefore the effects can not be determined. The project should not progress as there is insufficient information regarding the transport impacts.
- 1.11.13 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.

1.12 Design

- 1.12.1 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 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.
- 1.12.2 The regeneration of Deptford town centre is a key priority for LBL. Lewisham is the 39th most deprived local authority in England and Deptford is in an area ranked in the 20% most deprived in England. Deptford is identified as an opportunity area in the London Plan and is therefore expected to accommodate a substantial number of new jobs and homes. Furthermore Lewisham's Core Strategy establishes Deptford as an area where key regeneration and development opportunities will be focussed. As set out in the Core Strategy, this is 'due to the desire to address deprivation issues in order to improve education standards, general health and well-being, and local employment and training, through improvements to the physical and economic environment...'. Spatial Policy 2 further details the quantum of proposed change and highlights opportunities in the area.

- 1.12.3 The Core Strategy details sustainable movement as a key component of the broader regeneration aims. In particular, priority will be given to improved connectivity through the area by improving existing, and creating new, walking and cycling routes, as well as raising the quality of the pedestrian environment. The North Lewisham Links Strategy (2007) details improvements to the open space and more direct connections through the area. The proposed Deptford Church Street works site is in a key location for east-west connections from the High Street through to Deptford Creek, the Trinity Laban Centre and beyond.
- 1.12.4 Significant progress has been made in achieving the regeneration goals for this area, including: Redevelopment of Margaret McMillian Park, completed in 2009; Deptford Lounge and Tidemill Academy, opened in 2011; Giffin Square, completed this year; Deptford Railway Station upgrade, currently under construction; and Deptford High Street upgrades, scheduled for completion in Autumn 2013. Many more projects are coming on stream in the area and in order to achieve the regeneration aims the Deptford area needs to be considered as a whole, not simply as isolated projects or development on individual pieces of land.
- 1.12.5 The design of the site proposed by Thames Tunnel does not adequately reflect and incorporate the Council's strategic aspirations for the area and the Council considers that considerable further work is required on the design of the open space and any permanent structures. The extent of landscaping is limited to a small area (zone within which required landscaping would be located, as shown on section 48 Site works parameter plan) which will result in a disconnect between any landscaping and the surrounding area. The site can not be considered in isolation and proposals for landscaping need to fully consider and respond to the wider strategic aspirations for the area, particularly the east-west links from Deptford High Street through the site to the east.
- 1.12.6 The site is a key area of green open space in the town centre and in an area in which green space is otherwise scarce. High quality public realm and open space is key to the successful further regeneration of Deptford, particularly as additional housing is constructed and more people live, work and spend their leisure time in the area. The value of this open space to the existing and future local community can not be disregarded.
- 1.12.7 The proposed timescale for completing works is 2022-2023. It is therefore likely that the landscaping would not be completed for ten-years and given the significant regeneration and change planned for the area, LB Lewisham consider it premature to agree a final design at this stage. The design should reflect the needs and wants of the local community closer to the completion of works, particularly surrounding users such as residents, St Joseph's school and St Paul's Church.

- 1.12.8 The final design and location of permanent structures in such a sensitive location must be agreed by LB Lewisham.
- 1.12.9 In the event that the proposals were approved, LB Lewisham would require either an agreed and fully worked up landscape scheme to be secured through planning conditions and the design referenced within that condition or that costs for implementation of a scheme are agreed with the Council and payment made to it by TTT in the event that LB Lewisham implement such a scheme.

Earl Pumping Station Site

1.13 Alternative Sites

- 1.13.1 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.
- 1.13.2 The Preliminary environmental information report identifies 89 individual noise sensitive residential receptors (PEIR, Vol. 24, Table 9.4.2). The Main report on phase two consultation (page 382) states that alternative sites are considered less suitable as they are close to a larger number of residential properties which could be disrupted by the construction activities however the actual number of receptors has only been detailed at phase 2 consultation, in the PEIR. The site selection process did not involve any quantitative assessment and therefore a comparison between the actual number of receptors at different sites has not been undertaken and is not available.
- 1.13.3 Given concerns raised at phase 1 and phase 2 consultation, alternative sites should be reassessed using quantifiable data, rather than simply a judgement call made by TTT.
- 1.13.4 The advantages of Earl Pumping Station over the Foreshore adjacent to the boat yard and Helsinki Square is not clear and therefore both sites should be included in the Development Consent Order and submitted to the Planning Inspectorate in order for a decision to be taken.

1.14 Employment

- 1.13.1 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.

1.15 Noise

- 1.15.1 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.
- 1.15.2 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.
- 1.15.3 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.
- 1.15.4 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.
- 1.15.5 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.

1.16 Air Quality

- 1.16.1 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.

1.17 Transport

- 1.17.1 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.

- 1.17.2 LB Lewisham have not seen details of how the effects of the construction phase have been assessed, and TTT have not provided details of what methodology was/will be used to assess the effects. In addition, the methodology used for assessing the effects of the proposals has not been discussed or agreed with LB Lewisham no drafts of the Transport Assessments or details of preliminary assessments have been provided to LBL.
- 1.17.3 It is likely that the transport impacts associated with the construction phases of the development proposal would be significant along the proposed construction vehicle routes.
- 1.17.4 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.
- 1.17.5 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.
- 1.17.6 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.
- 1.17.7 The report on phase 2 consultation states that the assessment of transport effects is based on a methodology that has been agreed with LB Lewisham. The Council has **not** agreed to the methodology and seeks further information, as detailed above.
- 1.17.8 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.
- 1.18 Design
- 1.18.1 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.
- 1.18.2 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. The proposed shaft is a large, solid concrete structure, generally about 4.5 metres high but up to 7.5 metres high in places. It will be surrounded by residential development and it is therefore important that the appearance of the site is enhanced and the redevelopment of the area does not suffer from blank walls, unpleasant and unsafe public realm.

- 1.18.3 The design for the site should include: betterment works to the existing Thames Water site, particularly replacing metal sections of the existing fence and repairs; lower the rear wall to improve permeability, depending on the final use of the site at 36-38 Yeoman St; Improve pedestrian access on the western boundary, along Croft Street as it is currently poor and the footpath should be widened to enable its use. To avoid adverse effects on the public realm, the boundary treatment is particularly important in this location. The strip of unused land at the southern end, adjacent to the existing terraces on Croft Street, is unusable.

2. Equalities Implications

- 2.1 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 20% most deprived areas in England.
- 2.2 An Equality Analysis Assessment (EAA) has not been undertaken as part of the phase two consultation, nor has an EAA been presented in the section 48 material.

3. Conclusion

- 3.1.1 Thames Water's preferred sites within Lewisham cause considerable concern to the council for the reasons discussed above. The advantages of Deptford Church Street over both Borthwick Wharf Foreshore and Payne's Wharf is not clear and therefore all three sites should be included in the Development Consent Order and submitted to the Planning Inspectorate in order for a decision to be taken. Similarly, the advantages of Earl Pumping Station over the Foreshore adjacent to the boat yard and Helsinki Square is not clear and therefore both sites should be included in the Development Consent Order and submitted to the Planning Inspectorate in order for a decision to be taken.