

London Borough of Lewisham



Written Representations

Thames Tideway Tunnel

**Submission Reference: LBLew04
Unique Reference Number: 10018610
National Infrastructure Directorate Project Ref: WW010001**

November 2013

- 1.1 This document sets out the London Borough of Lewisham's written representations in relation to the application by Thames Water Utilities Limited for the Thames Tideway Tunnel.
- 1.2 Lewisham's Local Impact Report (LIR) (submission document reference LBLew05) contains details of the likely impact of the proposed development on the London Borough of Lewisham. This document does not repeat the detail of the impacts discussed in the LIR and takes them as read by the Examining Authority. A copy of Lewisham's LIR is attached as Annex 1.
- 1.3 The LIR concludes that the likely impact on the borough is negative, particularly during the construction phase of the project. In the Council's opinion, based in particular on the impacts at Deptford Church Street, the application should not be granted.
- 1.4 Further to the negative impacts on the borough, the Council makes the following representations in respect of procedural and consultation issues, particularly in relation to the site selection process for Deptford Church Street.
- 1.5 Insufficient information was available at pre-application stage and therefore the applicant's decisions and processes, particularly in relation to the site selection process and assessing the impact of effects, are fundamentally flawed. Additionally, relevant parties did not have access to accurate and high-quality information on the project and could therefore not adequately review assessments undertaken by the applicant.
- 1.6 Consultation was not carried out in a manner that ensured the participation and ability to influence proposals by LB Lewisham and other parties. The applicant's meeting processes and approach to sharing information and requesting feedback was flawed and did not allow a constructive dialogue between the applicant and the Council.
- 1.7 Deptford Church Street was introduced at phase two consultation as a selected site. This did not allow a thorough consideration of alternative sites and the assessment process did not involve quantitative assessment or comparison of technical data.
- 1.8 Borthwick Wharf Foreshore was the applicant's preferred site during the phase one consultation. For the phase two consultation Deptford Church Street was the applicant's preferred site and Borthwick Wharf Foreshore together with the Sue Godfrey Nature Reserve, Bronze Street, were put forward as alternative sites. No information has been made available as to why the applicant considered Deptford Church Street to be a more suitable site.

- 1.9 The early site selection assessment and weighting exercises do not include quantitative data, instead qualitative assessments were carried out by the applicant's staff who used their professional judgement to evaluate the sites. No technical studies or data were available for comparison at site selection stage and no record of the professional evaluation of sites has been published to allow others to consider whether it is appropriate.
- 1.10 The Council responded to the applicant's pre-application consultation stating its dissatisfaction with Deptford Church Street as a preferred site and setting out the advantages of Borthwick Wharf as an alternative, along with the adjacent Paynes Wharf, which is a foreshore site with access to the River Thames for transportation of spoil and materials.
- 1.11 Development of both Borthwick Wharf and Paynes Wharf are now under way and therefore they are no longer available as realistic alternative sites. The applicant should give further consideration to alternative sites, following a thorough and transparent site selection process.
- 1.12 The application should not be granted as Deptford Church Street should not have been selected as a preferred site and a thorough review of realistic alternative sites should now be undertaken.

Annex One – Copy of LB Lewisham’s Local Impact Report

London Borough of Lewisham



Local Impact Report

Thames Tideway Tunnel

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Glossary

CEMP Construction Environmental Management Plan

CoCP Code of Construction Practice

CPZ Controlled Parking Zone

CS4 Cycle Superhighway 4

DCO Development Consent Order

ES Environmental Statement

GFT Greenwich Feeder Tunnel

HGV Heavy Goods Vehicle

LB Lewisham London Borough of Lewisham

LB Southwark London Borough of Southwark

LIR Local Impact Report

PAH Polycyclic Aromatic Hydrocarbons

1.0 Introduction

- 1.1 This Local Impact Report (LIR) contains details of the likely impact of the proposed Thames Tideway Tunnel development on the London Borough of Lewisham. It has been prepared in accordance with the advice set out in Advice Note No 1: Local Impact Reports issued by the Planning Inspectorate in April 2012 (Version 2).
- 1.2 The LIR consists of a statement of positive, neutral and negative impacts in order to assist the Examining Authority in identifying local issues which might not otherwise come to its attention in the examination process.
- 1.3 This LIR also contains the Council's views on DCO articles, requirements and DCO obligations as proposed by the applicant and how those articles, requirements and obligations could be improved.
- 1.4 For the purposes of this report references the "the Council" means the local authority for the London Borough of Lewisham. References to the "London Borough of Lewisham" or "LB Lewisham " means the geographical area for which the Council is the local authority.

2.0 Structure of Report

- 2.1 The structure of the LIR has been informed by the Planning Inspectorate's advice note on Local Impact Reports and seeks to inform the examining authority and draw out relevant local information and local knowledge.
 - **Background (Chapter 3)** This chapter outlines the process to date and the Council's involvement in it
 - **Policy Context (Chapter 4)** This chapter lists relevant planning policy at national, regional and local levels.
 - **Consultation (Chapter 5)** This chapter provides details about the Phase 2 consultation exercise as relevant to the LB Lewisham. A summary of the written views and comments in response to the consultation exercise is provided for the sites at Earl Pumping Station and Deptford Church Street, being the two sites of most concern to the Council. It also sets out the specific concerns of St Joseph's Catholic Primary School, as discussed with the Council in July 2013.
 - **The Sites and Their Setting (Chapter 6)** This chapter provides contextual information relating to the proposed Greenwich Feeder Tunnel (GFT) and the specific site related information for the two proposed 'drop shafts' at Earl Pumping Station and Deptford Church Street. Consideration is also given to the proposed development site at Greenwich Pumping Station (within the London Borough of

Greenwich) and its proximity to sites within the London Borough of Lewisham across Deptford Creek.

- **The Applicant's Proposals (Chapter 7).** This chapter provides a description of the proposed works and identifies the documents that where a fuller explanation of the development can be found. The chapter discusses the generic effects associated with the construction and operation of the tunnelling project such as odour and a summary of the proposed works are provided for Earl Pumping Station, Deptford Church Street in the London Borough of Lewisham and Greenwich Pumping Station in the Royal Borough of Greenwich.
- **Assessment of Likely Impacts (Chapter 8).** This chapter identifies the local receptors and local impacts of the development for each of the three sites at Earl Pumping Station and Deptford Church Street (LB Lewisham) and Greenwich Pumping Station (RB Greenwich).
- **DCO Obligations (Chapter 9).** This chapter contains some changes and additions to the DCO requirements considered appropriate by the Council and explains the Council's concerns about parts A and part B of the proposed CoCP. It also provides a summary of the structure and content of Part A and then gives a summary of the concerns for each of the three sites at Earl Pumping Station, Deptford Church Street (LB Lewisham) and Greenwich Pumping Station (RB Greenwich) in respect of Part B.

3.0 Background

- 3.1 Prior to acceptance of the application by the Planning Inspectorate in March 2013, the applicant, Thames Water Utilities Limited, undertook two formal rounds of public consultation.
- 3.2 In response to the first consultation exercise, the Council objected to the proposed use of Earl Pumping Station (letter dated 12/01/2011). After the first consultation round had been completed, the use of Deptford Church Street was proposed by the applicant instead of a site at Borthwick Wharf, the proposed use of which was dropped. The Council objected to this (letter dated 29/07/2011). The Council objected to the proposed use of both sites in response to the phase two consultation (letter dated 06/02/2012), and in its formal response to publicity undertaken by the applicant pursuant to section 48 of the 2008 Act (letter dated 05/10/2012). These consultation responses are attached in Annex 1.
- 3.3 On 14 March 2013 The Council submitted its formal representations to the Planning Inspectorate on the adequacy of the applicant's consultation exercise to the effect that the applicant had not met its consultation duties under the 2008 Act and that the application should not be accepted by the

Planning Inspectorate. The application was nonetheless accepted by the Planning Inspectorate on 27 March 2013.

- 3.4 The Council submitted a relevant representation to the Planning Inspectorate (submitted 28/05/2013) which outlined its concerns about the proposals. A summary of principal concerns was submitted to the Planning Inspectorate along with the Council's letter (dated 28/08/2013) regarding attendance at the Preliminary Meeting.
- 3.5 This Local Impact Report details the likely impact of the development on the London Borough of Lewisham. A small number of issues have been clarified or addressed through the pre-application process and therefore this report may not repeat all concerns previously raised.

4.0 Policy Context

4.1 National Policy

- 4.1.1 National Policy Statement for Waste Water as designated in March 2012

4.2 Regional Policy

- 4.2.1 London Plan (July 2011)

- Policy 5.12 Flood Risk Management
- Policy 5.14 Water Quality and Wastewater Infrastructure
- Policy 7.5 Public Realm
- Policy 7.8 Heritage Assets and Archaeology
- Policy 7.13 Safety, Security and Resilience to Emergency
- Policy 7.29 The River Thames

4.3 Local Policy

- 4.3.1 The Lewisham Local Plan consists of Lewisham Core Strategy (adopted 2011), Lewisham Town Centre Local Plan (Examination in Public 2013), Site Allocations Local Plan (adopted June 2013), Development Management Local Plan (Proposed Submission), Catford Town Centre Local Plan (Proposed Submission) and Saved UDP Policies.

- 4.3.2 Core Strategy (June 2011)

- Objective 5 Climate Change
- Objective 6 Flood Risk Reduction
- Objective 10 Protect and Enhance Lewisham's Character
- Spatial Policy 1 Lewisham Spatial Strategy
- Policy 7 Climate Change and Adapting to the effects
- Policy 8 Sustainable Design and Construction
- Policy 9 Improving local air quality
- Policy 10 Managing and Reducing Flood Risk
- Policy 12 Open Space and Environmental Assts

- Policy 13 Addressing Lewisham's Waste Management Requirements.
- Policy 14 Sustainable movement and Transport
- Policy 15 High Quality Design for Lewisham
- Policy 16 Conservation Areas, Heritage Assets and the Historic Environment.
- Policy 17 Protected vistas
- Policy 18 The location and design of buildings
- Strategic Site Allocation 5 Plough Way

4.3.3 Unitary Development Plan (July 2004) Saved Policies

- URB 12 Landscape and Development
- URB 13 Trees
- URB 14 Street Furniture and Paving
- ENV.PRO 9 Potentially Polluting Uses
- ENV.PRO 11 Noise Generating Development
- ENV.PRO 13 Light Generating Development
- ENV.PRO 17 Management of the Water Supply
- HSG 4 Residential Amenity

4.3.4 Development Management Local Plan (Proposed Submission Version August 2013)

- DM Policy 1 Presumption in favour of sustainable development
- DM Policy 23 Air quality
- DM Policy 25 Landscaping and trees
- DM Policy 26 Noise and Vibration
- DM Policy 27 Lighting
- DM Policy 28 Contaminated Land
- DM Policy 30 Urban design and local character
 - *General principles*
 - *Detailed design issues*
- DM Policy 35 Public realm
- DM Policy 36 New development, changes of use and alterations affecting designated heritage assets and their setting: conservation areas, listed buildings, schedule of ancient monuments and registered parks and gardens
 - *A. General principles*
 - *B. Conservation areas*
 - *C. Listed Buildings*
 - *D. Scheduled Ancient Monuments and Registered Parks and Gardens*

4.3.5 Evidence Base

- Deptford New Cross Master Plan (November 2007)
- North Lewisham Links (June 2007)

5.0 Consultation

- 5.1 In December 2011 the Council sought to obtain information about local concerns in relation to both sites (Earl Pumping Station and Deptford Church Street) and so undertook a consultation exercise collecting written comments and views expressed at two public meetings, one focused on each site.
- 5.2 The comments received in relation to the Earl Pumping Station site were generally supportive of the project as a whole with questions asked relating to engineering aspects, traffic impact, compensation for properties in close proximity and control of odour emissions.
- 5.3 The comments received in relation to the Deptford Church Street site expressed opposition to the use of the site and, in summary, covered 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, 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's consultation to date.

5.4 In July 2013 the Council sought to understand the specific concerns of St Joseph's Catholic Primary School. Following a meeting between Council officers and St Joseph's Catholic Primary School's Head Teacher and the Chair of Governors, the Council understands that the following are the primary concerns about the functioning of the School during the construction period and how they ought to be addressed, in order to mitigate the adverse impacts.

Dust and noise:

- That there should be replacement windows provided that are tightly sealed to prevent dust entering the school buildings.
- That secondary glazing would be most effective in reducing noise.
- That the fire doors need to be replaced to seal against dust. The existing two fire doors are not tightly fitted and have gaps where dust enters.
- That the possibility of a temporary fence along the boundary with Crossfield Street for the duration of works to help keep out noise and dust should be considered.

Loss of open space:

- That an astroturf surface should be provided on the football pitch. Regular cleaning / maintenance to avoid negative impacts from dust.

Maintenance and upkeep:

- That additional window cleaning is needed to address dust pollution from the works site.
- That additional indoor cleaning is needed to address dust pollution from the works site.

Access:

- That an additional lolly-pop person is needed to assist with crossings.
- That the possibility of a shuttle bus service at peak times should be given proper consideration.

Liaison and communications:

- That there should be full and proper liaison with the school throughout the construction period.
- That the applicant should run sessions / teach ins at the school about the works, the process, construction, ecology etc.

Additional works sought by St Joseph's:

- That thermal lining to the loft ought to be provided by the applicant

6.0 The sites and their settings

6.1 Context

- 6.1.1 The Greenwich Feeder Tunnel (GFT) is proposed to connect the main west-east tunnel at Chambers Wharf (in LB Southwark, on the Thames) with Thames Water's existing Greenwich Pumping Station (in the Royal Borough of Greenwich, but facing LB Lewisham across Deptford Creek). There will be a major construction site at each end of the GFT, which will be 'driven' from Greenwich to Southwark, with the tunnelling spoil all being removed via the Greenwich Pumping Station construction site.
- 6.1.2 In between these two end points two 'drop shafts' are proposed, both of them in LB Lewisham, one at Thames Water's existing Earl Pumping Station which is in LB Lewisham, but right on the border with LB Southwark, and the other off Deptford Church Street.
- 6.1.3 The application documents describe the GFT from west (Chambers Wharf) to east (Greenwich Pumping Station), and that is also the convention adopted in this report.
- 6.1.4 This report is primarily concerned with the two 'drop shafts' proposed in the LB Lewisham, and with receptors, including both residents and environmental resources, located in the LB Lewisham. However, consideration is also given to:
- the scope for receptors in LB Southwark to be affected by works at the Earl Pumping Station construction site; and
 - the scope for receptors in LB Lewisham to be affected by works at the Greenwich Pumping Station construction site.
- 6.1.5 The two maps in Annex 2 show the locations of the two 'drop shaft' sites in LB Lewisham, and the map showing the Deptford Church Street site also shows the Greenwich Pumping Station site.

6.2 Earl Pumping Station

- 6.2.1 The Earl Pumping Station site is located in an area of mixed residential and commercial uses. It covers the Thames Water pumping station itself, and adjacent premises (to the south east of the pumping station) which are currently occupied by three separate businesses.
- 6.2.2 Earl Pumping Station itself is within LB Lewisham, but parts of the roads within the application site boundary are in LB Southwark and some of the properties closest to the pumping station are in LB Southwark. The HGV access route via Plough Lane and Yeoman Street largely passes through LB Southwark.

- 6.2.3 A contextual location drawing of the site is provided in Annex 2, and further drawings are in the Book of Plans for Earl Pumping Station (ref 2.22) and in the set of drawings within Volume 22 of the Environmental Statement (ref 6.2.22), which deals specifically with Earl Pumping Station.
- 6.2.4 The drawing within Annex 2 provides a context for the following description of the surrounding area. The description works clock-wise around the site, from the northern end of Yeoman Street.
- Yeoman Street runs south south east from Plough Way towards the site, and along the boundary between LB Lewisham (to the east) and LB Southwark (to the west). It slopes gently down hill, between the new Iceland Wharf development (to the east) and two properties to the west (Nos. 86-124 Plough Way, and No.18 Yeoman Street on the corner with Chilton Grove). The site access route (both in-bound and out-bound) runs along this stretch of Yeoman Street. A large number of dwellings within the properties identified above have windows which face onto Yeoman Street.
 - Opposite Earl Pumping Station, on the east side of Yeoman Street, is a site where planning permission for new residential units is being sought (referred to in the application documents as the Yeoman Street development). Further down Yeoman Street, also on the east side, is an industrial unit / building supplies (or similar) depot. This unit will shortly be almost surrounded by residential dwellings.
 - Yeoman Street is currently blocked off to the south of the industrial / building supplies business, but may be opened up when the Cannon Wharf development, which will be built on the land to the SE of the site (including the former Insulcrete Works site), has been completed. New residential units within the Cannon Wharf development will in due course overlook the site.
 - Sandwiched between the site, the new Cannon Wharf development and Croft Street / Woodcroft Mews (due south of the site) is a row of 2-storey terraced houses (Nos. 52-62 Croft Street and 1-6 Woodcroft Mews). The setting of these dwellings will be very substantially changed over the next few years as the Cannon Wharf development is built and occupied.
 - Occupying a corner plot to the SW of the site (facing Croft Street to the NE and SE) is a securely fenced and largely open industrial / utility plot with outdoor equipment.
 - NW of the industrial / utility plot (see above) is Nos.108-136 Croft Street, a residential block within LB Southwark which faces directly onto the existing Earl Pumping Station.
 - Facing Croft Street and the Earl Pumping Station from the northern side of Chilton Grove are Nos.1-39 Chilton Grove (a 5-storey residential block in LB Southwark) and Nos.18-32 Yeoman Street (a 4-storey residential block, also in LB Southwark).

- 6.2.5 The site itself currently contains three businesses as well as Earl Pumping Station. These three businesses will be displaced by the construction work. They include a bottled water distribution business, a vehicle storage depot, and a unit servicing mobile food units (ice cream and burger vans and similar). No replacement accommodation is proposed.

6.3 Deptford Church Street

- 6.3.1 This proposed construction site is located on Crossfield Amenity Green, off Deptford Church Street. It is a green space located in the heart of Deptford town centre, a district centre, approximately 115 metres from Deptford High Street.

- 6.3.2 It is located within a sensitive setting, being adjacent to both St Paul's church, a Grade I listed building, and St Joseph's Catholic primary school. As currently configured this space is accessible to the community, is used as an east-west thoroughfare and is provides visual amenity from several nearby residential buildings.

- 6.3.3 A contextual location drawing of the site is provided in Annex 2, and further drawings can be found in the Book of Plans for Deptford Church Street (ref 2.23) and in the set of drawings within Volume 23 of the Environmental Statement (ref 6.2.23), which deals specifically with Deptford Church Street.

- 6.3.4 The drawing within Annex 2 provides a context for the following description of the surrounding area. The description works clock-wise around the site, starting at St Paul's church to the north.

- St Paul's church, Deptford, is a Grade I listed building on the north side of Coffey Street. It is surrounded by its churchyard, the walls of which are Grade II listed. The churchyard includes a large number of mature trees. St Paul's is described in more detail below.
- To the east of St Paul's churchyard (and to the west of Deptford Church Street) is an area of green open space used by dog walkers, among others. The trees within and to the north of this area mostly link up with others within the churchyard and they were evidently originally planted in a series of straight lines.
- Deptford Church Street itself is a significant thoroughfare, linking the A2, to the south and the A200, to the north. The 47 bus route runs along Deptford Church Street. There is a pedestrian crossing at the end of Coffey Street, giving access to Bronze Street.
- To the east of Deptford Church Street is the Sue Godfrey Nature Park, located between Berthon Street and Bronze Street, and beyond it Ferranti Park and play area. The Sue Godfrey Nature Park was originally named Bronze Street Nature Park, and became a nature park in 1984 after lengthy campaigning by local residents. The perimeter defences were removed, paths laid out and belts of trees and shrubs were planted. The nature park increased in size through the gradual incorporation of a

former lorry park on its western end. It was renamed in 1994 in memory of Sue Godfrey, a local resident and environmental campaigner, in recognition of the efforts that she had devoted to the park, and her contribution to the life of the adjacent Crossfield Estate.

- South of the park is the Crossfield Estate, developed in the 1930s by the London County Council. The ends of Congers House and Farrer House face onto the site across Deptford Church Street, about 45m from the site boundary (though there are no windows on the elevations that face Deptford Church Street, and there are also several mature trees between the buildings and the road).
- South of Farrer House, and south of the site, is the route of the London-to-Greenwich railway, which is elevated and on top of a Grade II listed viaduct at this location. South of the railway are other buildings with views of St Paul's Church.
- Immediately between the railway viaduct and the site is Crossfield Street, a no-through-road accessed from Deptford Church Street. There are several small businesses whose premises sit on the southern side of Crossfield Street, partly accommodated within railway arches, and with access from Crossfield Street. Further details of these businesses are given below.
- To the west of the site is St Joseph's Catholic Primary School, and a small loop of road where children can be dropped off and picked up. A portion of the school's playground is separated from Crossfield Street by a brick wall. See below for further information on St Joseph's Catholic Primary School.

6.3.5 St Paul's church is an important example of English Italianate Baroque, built in 1730 to a design by the architect Thomas Archer.

- The Royal Commission on the Historical Monuments of England has referred to St Paul's as one of London's finest Baroque buildings.
- Pevsner described it as coming "... closer to Borromini and the Roman Baroque than any other English church of this date."
- It was described by Sir John Betjeman as "... a pearl at the heart of Deptford".
- According to Simon Jenkins (in 'England's Thousand Best Churches') "St Paul's is a building that foreigners can never credit as being English. The exterior is Baroque of astonishing vigour, with giant classical orders on all sides. The church is dramatically preserved and recently restored (between 2000 and 2004), in its spacious and peaceful churchyard."
- It has been listed Grade I since 1950 and is thus amongst the 2.5 % of most significant historic buildings nationally.

6.3.6 The businesses on the southern side of Crossfield Street utilise the space below the railway arches, which they rent from Network Rail Property (networkrail.co.uk/property tel 0800 830 840). All of them rely on the existence of on-street parking. The businesses located there are:

- Berham's Plumbing Supplies (berhams.co.uk), an on-line plumbing and general hardware supply business. This is their only premises.
- A1 Clutch, Gearbox & Axle Centre (no website, tel 020 8691 3807). This appears to be their only premises.
- Mount Aureol Freight Services Ltd (mountaureol.co.uk), a freight consolidation and forwarding business specialising in shipping to Sierra Leone. This is their only premises, and they regularly use the road space in front of their premises (which is at the end of Crossfield Street, which is a cul-de-sac), for handling boxed and palletised freight.

6.3.7 St Joseph's Catholic Primary School is a voluntary aided school taking pupils between the ages of 4 and 11. Its maximum capacity is 288 pupils. When it was last inspected by Ofsted (November 2012) it had a roll of 276 pupils, of whom about one quarter receive free school meals. The Ofsted inspection resulted in St Joseph's being rated as 'good' overall which is the second best rating on a 4-point scale, as well as for all four individual assessment categories (i.e. achievement of pupils, quality of teaching, behaviour and safety of pupils, and leadership and management). Their school building and playground face onto Crossfield Street and the green open space. The school uses the green space as an emergency assembly point in the event of a fire.

6.4 Greenwich Pumping Station

6.4.1 The Greenwich Pumping Station is in the neighbouring Royal Borough of Greenwich, but faces westwards across Deptford Creek towards the Faircharm Industrial Estate and the Creekside Educational Trust's ecology centre, both of which are in LB Lewisham. In October 2013 planning permission was given for the redevelopment of the Faircharm estate as a mixed use commercial and residential site. Redevelop will take place over the next few years.

6.4.2 An elevated section of the Docklands Light Railway provides a significant degree of separation between the Faircharm Industrial Estate and the existing pumping station. To the north of the Greenwich Pumping Station is the London-to-Greenwich railway, running on a listed viaduct at this stage. On the northern side of the viaduct, also facing onto Deptford Creek, is a section of the Greenwich Pumping Station work site (called Phoenix Wharf) which will be used for stockpiling materials and handling excavation spoil. Facing this site directly across Deptford Creek is a group of industrial buildings associated with the Cockpit Arts premises at Creekside (in LB Lewisham). To the north of them (also in LB Lewisham) is an area of open space and the Trinity Laban Conservatoire of Music and Dance which was awarded the RIBA Sterling Architecture Prize in 2003.

7.0 The Applicant's Proposals

7.1 Definition of the Works

- 7.1.1 The proposed works are described in the Engineering Design Statement (ref 7.18). The GFT is covered in Chapter 3 of that document, and the three sites which affect LB Lewisham are dealt with in Chapters 25-27.
- 7.1.2 The Applicant's drawings for approval (as well as those with illustrative material and other drawings provided for information only) are in the Books of Plans (one each for the three sites under consideration, refs 2.22, 2.23 and 2.24 respectively).
- 7.1.3 All of the works are proposed to be controlled by a Code of Construction Practice (ref 6.2.01). Part A is common to all sites and Part B provides specific variations and procedures on a site-by-site basis. The Code of Construction Practice is discussed in more detail in Section 9 of this report.

7.2 Greenwich Feeder Tunnel

- 7.2.1 The 5m (internal diameter) GFT will pass beneath Evelyn Ward of LB Lewisham, where it will pass through chalk. Neither the 'drive site' nor the end point is in LB Lewisham, though the drive site at Greenwich Pumping Station is very close to the borough boundary. The tunnel will typically be about 45m below existing ground level.
- 7.2.2 As well as transporting sewage to East London, the tunnel and shafts will be used to store sewage temporarily until the treatment works can accept it.

7.3 Earl Pumping Station

- 7.3.1 The work site is based at the existing Earl Pumping Station (see Sections 6.2 and 8.1 of this report for details).
- 7.3.2 The drop shaft will have an internal diameter of about 17m, and will be about 51m deep from existing ground level to the base slab. The shaft will extend upwards about 3m above ground level.
- 7.3.3 The other main elements of the works comprise:
- an interception chamber;
 - a valve chamber;
 - a connection culvert;
 - ventilation structures;
 - a pump sump and associated pipework; and
 - electrical and control equipment (to be housed in the existing pumping station).

- 7.3.4 Temporary works will affect Yeoman Street, Chilton Grove and Croft Street, and the HGV access route will use Yeoman Street in both directions as a way of linking to Plough Way and the trunk road network.
- 7.3.5 HGV traffic is expected to exceed 40 lorry movements per day (20 lorries each way) between March 2017 and September 2017 (7 months), with a daily peak of about 64 movements per day in June to August 2017.
- 7.3.6 Smaller peaks (20-30 lorry movements per day) are expected in April 2018 and February 2019. Most of the rest of the time HGV flows are unlikely to exceed 10-16 lorry movements per day.

7.4 Deptford Church Street

- 7.4.1 The work site will occupy the triangle of green open space south of St Paul's church (see Sections 6.3 and 8.2 of this report for details).
- 7.4.2 The drop shaft will have an internal diameter of about 17m, and will be about 48m deep from existing ground level to the base slab.
- 7.4.3 The other main elements of the works comprise:
- an interception chamber (to be constructed beneath Deptford Church Street) incorporating a flow diversion structure and valve chamber;
 - a connection culvert;
 - ventilation structures;
 - an electrical and control kiosk.
- 7.4.4 Temporary works will affect Crossfield Street, Coffey Street and Deptford Church Street, including closing half of the width of the street for a period of about 12 months (see ES Volume 23 site assessment para 3.3.39, ref 6.2.23). A loss of local parking spaces is proposed, Crossfield Street will be converted from a cul-de-sac to a one-way through road with no parking, and Coffey Street will also become one-way with some loss of parking. Local bus stops on Deptford Church Street will be temporarily re-located.
- 7.4.5 The HGV access route will use Deptford Church Street, from south to north, as a way of linking to Creek Road, Norman Road, Greenwich High Road and the trunk road network, assumed to be eastwards on the A2.
- 7.4.6 HGV traffic is expected to exceed 40 lorry movements per day (20 lorries each way) between July 2017 and January 2018 (7 months), with a daily peak of about 68 lorry movements per day in December 2017.
- 7.4.7 Smaller but still significant peaks of 32-34 lorry movements per day are expected in December 2018 and March 2020. Most of the rest of the time HGV flows are unlikely to exceed 10 lorry movements per day.

7.5 Greenwich Pumping Station

- 7.5.1 The work site is split into two parts, the main one based on Greenwich Pumping Station, but with a linked site to the north of the railway viaduct fronting onto Deptford Creek (Phoenix Wharf) for materials storage and handling (see Sections 6.4 and 8.4 of this report for details).
- 7.5.2 The peak of working at Greenwich Pumping Station, as reflected by the expected level of HGV movements, will be from March 2018 to May 2019, when daily lorry movements will exceed 80 per day (40 lorries each way: roughly twice the peak level at the two LB Lewisham sites).

7.6 Overlaps in Site Working

- 7.6.1 The proposed scheduling of work indicates that there will be peaks of combined HGV traffic between June and August 2017 of 136-172 lorry movements per day, reasonably evenly split between the three sites, and in December 2018 there will be 198 lorry movements per day, mainly from Greenwich Pumping Station. Generally speaking, from early 2018 onwards traffic will be heavily dominated by the flows from Greenwich Pumping Station. All of this traffic is likely to affect the A2 east of Greenwich High Street and therefore affects LB Lewisham drivers who are heading south east.

8.0 Assessment of Likely Impacts

8.1 Earl Pumping Station

Local Receptors

- 8.1.1 Several of the residential and commercial / industrial properties surrounding the site are only 10-20m from the site boundary and many others are immediately adjacent to the HGV access route. In both environmental and socio-economic terms, it is principally the residents of these properties that constitute sensitive receptors.
- 8.1.2 There will also be people who are directly affected by the loss of the three businesses to the south of the existing Earl Pumping Station, which will be displaced by the construction process.
- 8.1.3 The most sensitive receptors which need particular consideration at Earl Pumping Station are:
- Residents of all surrounding properties, in both LB Lewisham and LB Southwark, who will be affected by construction noise, construction dust, visual intrusion associated with construction (including lighting effects), and the disruptive effects arising from having construction traffic in an area which is largely residential and with very limited passing commercial traffic at present. These are expected to include:

- current residents of properties which face onto Yeoman Street;
- current residents of properties at the eastern end of Chilton Grove, and the eastern end of Croft Street;
- future residents of the as-yet unbuilt properties on Yeoman Street;
- future residents of some of the as-yet unbuilt properties within the Cannon Wharf development closest to the site's SE boundary.
- Adjacent buildings, see above for the identification of the properties closest to the site, which could be affected by vibration as a consequence of piling works and shaft construction.
- Existing mature trees, mainly on Croft Street.
- The owners, workers and customers of the three businesses which will be displaced by the extension of the site beyond the current footprint of the Earl Pumping Station.

Local Impacts

- 8.1.4 The Council agrees with the ES that some current local residents and some future local residents can expect to be significantly adversely affected by construction noise, and to a lesser extent by construction dust, visual intrusion and the general effects of construction traffic.
- 8.1.5 The ES does not recognise that Earl Pumping Station site is situated on the border of the London Borough of Southwark and London Borough of Lewisham, therefore the land quality issues will need to be managed in close liaison with both local authorities, obtaining the approval of both authorities where approval is required.
- 8.1.6 The LB Southwark's CoCP Part Bs require a working party between Thames Water / Contractor, members, residents and council staff to meet on a regular basis. This requirement should be extended to the Earl Pumping Station Site. The working group is to be convened with representatives made up from residents, local councillors from the two authorities, contractors, the employer and officers from both authorities.

Air Quality and Emissions

- 8.1.7 The site is located within an air quality management area and the Council is concerned that the proposals will result in a reduction in air quality, particularly for those sensitive receptors surrounding the works site and particularly in relation to reduced air quality from dust and particulates from construction and transportation.
- 8.1.8 The residents of the older terraced properties on Croft Street will be particularly affected by the combination of work on the Cannon Wharf development and work at Earl Pumping Station. This will be true irrespective of whether the two projects are constructed in sequence or in parallel.

- 8.1.9 It is noted (see paras 4.5.29 and 9.3.4 of the site-specific ES, Volume 22, ref 6.2.22) that the full application of a revised Code of Construction Practice (CoCP) will be critical to avoiding significant adverse dust effects, as well as to containing noise and vibration effects to the levels that have been assessed. Information on the approach to further noise mitigation is contained in Section 9.8 of the site-specific ES.
- 8.1.10 The ES recognises that due to the presence naphthalene and other Polycyclic aromatic hydrocarbons (PAHs) on the site there is an odour impact on the surrounding area. LB Southwark is aware that work on a neighbouring site with a similar development in the area is causing a problem to the neighbouring residential properties due to the odour of naphthalene and other PAHs.
- 8.1.11 The ES states that the modelling results show that the highest offsite concentration is $0.95 \mu\text{g}/\text{m}^3$ in Chilton Grove adjacent to the Earl Pumping Station. There are terraced houses immediately adjoining and maisonettes directly opposite the Pumping Station. The ES states that the odour could be detectable at residential properties close to the site for up to 22 hours per year which is less than that which could cause a nuisance.
- 8.1.12 The highest concentration of naphthalene offsite is reported to be $1.6 \text{ g}/\text{m}^3$ annual mean, which is within the World Health Organisation guideline of $10.0 \text{ g}/\text{m}^3$ annual mean. Air quality modelling is suitable for predicting annual averages, but for short-term there is a large uncertainty attached to the reported levels.
- 8.1.13 LB Lewisham and LB Southwark Councils are concerned that there will be a loss of amenity during the excavation of the contaminated material on site and the extent of the impact has not been fully assessed.
- 8.1.14 The Councils consider that there is a requirement for site specific air quality and dust monitoring for naphthalene to be included in CoCP Part B during the excavation of the contaminated soils on site.
- 8.1.15 The ES¹ contains mitigation measures to deal with the potential problems from the site. However it is not clear how these effective material management procedures and environmental monitoring will be approved by Environmental Agency and the relevant Local Authorities. Further controls are proposed in the form of additional Requirements, as detailed in section 9.1, Earl Pumping Station, Additional Requirements.
- 8.1.16 ***The local impact is likely to be negative.***

¹ Volume 22 section 8 paragraph 8.2.12 and 8.2.13

Biodiversity, Biological Environment & Ecology

- 8.1.17 The area includes a number of mature street trees, including a number of mature London Plane trees in Croft Street. These are particularly important given the generally poor quality environment and will continue to be important as the area becomes increasingly residential.
- 8.1.18 The Illustrative Construction and Highway Plans show a temporary construction access and permanent access from Croft Street that would miss an existing mature London Plane tree that is close to the boundary with No. 62 Croft Street (this tree is identified on the 'As Existing Site Features Plan' (DCO-PP-21X-EARPS-220002). See photo 1 in Annex 3.
- 8.1.19 However, the Access Plan (Drawing DCO-PP-21X-EARPS-220003) (For Approval) would allow for temporary and permanent access to be created along a defined length of Croft Street that includes the stretch where this existing tree is. In the Council's opinion this plan should be revised to prohibit the creation of a temporary or permanent access along the southern most 10m length of the site, up to the boundary with No. 62 Croft Street.
- 8.1.20 Further, an additional requirement in the DCO should ensure that all existing street trees along Croft Street are protected during the works to ensure their health and survival.

EARPSXX – Protection of Street Trees

1) Work Nos. 21a and 21b or any Ancillary Works shall not commence until a scheme setting out measures for the protection of existing trees in the public highway along Croft Street (as identified on Drawing DCO-PP-21X-EARPS-220002) has been submitted to and approved in writing by the relevant planning authority.

2) The approved tree protection measures shall be implemented and maintained in place throughout the construction work unless otherwise agreed in writing by the relevant planning authority.

- 8.1.21 ***As the DCO is currently drafted the local impact is likely to be negative.*** With adequate tree protection measures, by way of new Requirements, and an amended Drawing DCO-PP-21X-EARPS-220003, to show vehicle access avoiding all street trees, ***the local impact is likely to be neutral.***

Coastal /River Change

- 8.1.22 There are not likely to be any local impacts.

Compulsory Acquisition and Related Matters

- 8.1.23 Earl Pumping Station sits within Plough Way which is one of five strategic sites in the L B Lewisham intended to play a crucial role in delivering the objectives of the Council's Core Strategy (2011) and that will play a crucial

role in place making by creating new places and enabling a transformation of the wider area.

- 8.1.24 In addition to a number of planning permissions within the strategic allocation and surrounding area, Cannon Wharf (DC/08/68523) is expected to be under construction until at least 2021/2022 and will deliver a mix of uses including close to 700 new homes.
- 8.1.25 The compulsory acquisition of land at Cannon Wharf, shown as Plots 22 and 24 in the Book of Reference, will prevent or delay the implementation of a planning permission and the delivery of much needed new affordable homes.
- 8.1.26 Amendments should be made to the Book of Plans Section 22 (DCO-PP-21X-EARPS-220001 to DCO-PP-21X-EARPS-220018) (some for Approval and some Illustrative) to exclude Plots 22 and 24 from LLAU and show alternative arrangements for construction access from Yeoman Street.
- 8.1.27 Amendments should be made to the Land Plan Greenwich connection tunnel sheet 44 Book of Plans – Section 3 (DCO-LP-000-ZZZZZ-030035) and Book of Reference to exclude Plots 22 and 24 from LLAU.
- 8.1.28 Consequential changes should be made to Schedule 9 Access to Works to refer to revised drawing showing construction access from Yeoman Street.
- 8.1.29 ***As the DCO is currently drafted the local impact is likely to be negative. With amendments resulting in no delay to the Cannon Wharf permission the local impact is likely to be neutral.***

Design, Landscape and Visual Impact

- 8.1.30 The existing pumping station sits within what is currently a semi-industrial area. However given the residential developments proposed and approved in the surrounding area, this setting will change dramatically. The site is within View Corridor 5A.2, Greenwich Park, as identified in the Mayor of London's View Management Framework.
- 8.1.31 During the construction process there will be a loss of amenity due to the loss of pavement space, disruption to the area and the temporary loss of parking facilities.
- 8.1.32 To avoid adverse effects on the public realm, the boundary treatment is particularly important in this location. High quality replacement fencing should be installed along the western edge of the existing Earl Pumping Station site and to continue around the new shaft structure, with details to be approved by the Council.

8.1.33 Yeoman Street is currently semi-industrial in nature and all new residential development coming forward on Yeoman Street will result in a predominantly residential environment. Contributions towards public realm improvements are necessary in order to ensure the amenity of the area is appropriate for residential activities. The applicant should contribute to public realm improvements on Yeoman Street including relaying / replacing any damaged cobblestone carriageway, new paved footways, tactile paving and tree planting.

8.1.34 As discussed under the Biodiversity, Biological Environment & Ecology section above, the protection of mature London Plane trees along the Croft Street frontage is crucial to the acceptability of the works in terms of Design, Landscape and Visual Impact. In the Council's opinion an additional Requirement is needed for the protection of these trees.

8.1.35 ***As the DCO is currently drafted the local impact is likely to be negative. With the suggested changes and Requirements the local impact is likely to be neutral.***

Flood Risk and Climate Change

8.1.36 The site and its surroundings fall into the Environment Agency's Flood Zone 3, signifying that flooding from the Thames would be a regular problem in the absence of the existing flood protection infrastructure (the Thames Barrier and river-side flood protection structures). This situation will not be affected by the proposed works.

8.1.37 There are no licensed groundwater abstractions points within 500m of the site, but there are two between 500m and 1km, both to the north of the site, and both drawing water from the Chalk aquifer. The site is not within any of the Source Protection Zones as defined by the Environment Agency in order to protect public drinking water abstractions.

8.1.38 ***The local impact is likely to be neutral.***

Historic Environment

8.1.39 The site and its surroundings are in an area of general interest for archaeology and therefore all works that are undertaken should comply with accepted practice for archaeological areas.

8.1.40 There is a marker stone in the footway crossover of the eastern existing access from Croft Street which serves Nos. 64-72. This is an interesting historic feature in an area that generally has a poor built environment. The marker stone should be retained and reinstated in the same place in the footway. In the Council's opinion an additional Requirement is needed to ensure the marker stone is incorporated into a reinstated footway. See photo 3 in Annex 3.

EARPSXX – Removal and reinstatement of existing marker stone

The existing marker stone 'SPD 1897: SQMR 1871' located in the existing vehicular access crossover serving Nos. 64-72 Croft Street shall be removed before Work Nos. 21a and 21b or any Ancillary Works commence, stored in a secure and safe place and reinstated in the same location in any new vehicular access crossover or reinstated footway as part of reinstatement works once the main authorised construction activities are complete.

- 8.1.41 ***As the DCO is currently drafted the overall impact is likely to be negative. With the suggested requirement the local impact is likely to be neutral.***

Land Use Including Regeneration and Open Space

- 8.1.42 As discussed under the Compulsory Acquisition and Related Matters heading above, the compulsory acquisition of land at Cannon Wharf, shown as Plots 22 and 24 in the Book of Reference, will prevent or delay the implementation of a planning permission and the delivery of much needed new affordable homes.

- 8.1.43 It is crucial to the regeneration aims of the Council that the development of the Plough Way strategic allocation, including the Cannon Wharf site is not delayed and that the delivery of this strategic site is not prejudiced.

- 8.1.44 ***As the DCO is currently drafted the local impact is likely to be negative. With amendments resulting in no delay to the implementation of the Cannon Wharf planning permission the local impact is likely to be neutral.***

Noise and Disturbance

- 8.1.45 There will be an impact of construction noise, compaction works and construction vehicle noise on surrounding residential properties. The residents of the older terraced properties on Croft Street will be particularly affected by the combination of work on the Cannon Wharf development and work at Earl Pumping Station. This will be true irrespective of whether the two projects are constructed in sequence or in parallel.

- 8.1.46 There will be noise impacts and are for the most part the applicant proposes that they be dealt with through the CoCP. It is noted (see paras 4.5.29 and 9.3.4 of the site-specific ES, Volume 22, ref 6.2.22) that the full application of the Code of Construction Practice (CoCP) will be critical to avoiding significant adverse dust effects, as well as to containing noise and vibration effects to the levels that have been assessed. Information on the approach to further noise mitigation is contained in Section 9.8 of the site-specific ES.

- 8.1.47 Given the sensitivity of surrounding residential receptors, particularly those older terraced properties on Croft Street, the Council considers that an automatic entitlement to noise insulation, without having to demonstrate an entitlement under the CoCP Part A, is necessary.
- 8.1.48 The LB Southwark consider that the applicant has underestimated the full extent of the impacts arising from noise. A greater number of properties would be significantly affected by noise from the proposals including 2-32 Chilton Grove and other properties to the west of the site on Chilton Grove (e.g. 70 to 106 Chilton Grove) which would also be adversely affected from traffic noise in connection with the construction works. For example, the traffic noise would be particularly acute for those properties close to the application site on Chilton Grove due to the additional noise impacts of vehicles accelerating as they move away from the site.
- 8.1.49 The application notes that ² the owners of properties that would be affected by noise **may** be eligible to apply for noise insulation through the *Thames Tideway noise insulation and temporary re-housing policy* and that application of these measures would mean that there would be no significant noise effects. The application goes on to state that *where the noise level would not trigger the provisions for noise insulation **some** of the properties may be **eligible** for compensation through the Thames Tideway Tunnel Compensation Programme. Where this is the case the noise effects would remain significant.* This ambiguity offers no reassurance to LB Southwark or residents as to how the impacts will be controlled and mitigated. The noise and re-housing policy does not set appropriate criteria for residents to apply given the noise impacts that would result and is flawed in its operational requirements. The same is applicable to the Compensation Programme which does not appear to be enforceable under the currently proposed terms of the draft DCO.
- 8.1.50 Whilst the Environmental Statement indicates that vibration levels would not reach a level which could cause impacts on residents' amenity, it notes that specific ground conditions encountered would not be known until piling is underway. It may therefore not be possible to use low impact vibration methods. This is a significant concern for residential amenity in both LB Lewisham and LB Southwark and, from the information available, it is not possible to determine whether or not adverse impacts would result from other methods of vibration. This concern is extenuated by the lack of any robust measures within the draft DCO, CoCP, requirements and s106 as proposed in the application to ensure that the contractor will utilise low vibration piling methods unless it is absolutely not possible. If it should be not possible to use these methods, there is then serious risk of further significant impacts upon the surrounding area for residents. Furthermore, the Thames Tunnel

² Para 24.3.8 of the Environmental Statement Non-Technical Summary

compensation programme is not sufficiently robust to offset the significant impacts.

- 8.1.51 ***The local impact is likely to be negative.*** Avoidance of significant noise and vibration impacts is the most effective solution to ensuring the comfortable occupation of surrounding residential properties.

Socio-Economic Effects

- 8.1.52 The proposed works will result in the displacement of three businesses for which alternative locations have not been identified. There are likely to be significant effects associated with moving business locations including loss of custom and the costs and expenditure associated with relocation.
- 8.1.53 The Skills and Employment Strategy focuses on the main drive sites and does not adequately support job opportunities for Lewisham residents. The Council considers that there should be specific targets as regards the employment of Lewisham residents.

- 8.1.54 ***The overall impact is likely to be negative.***

Traffic, Travel and Transportation

- 8.1.55 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, particularly given cumulative impacts. 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. The cycle superhighway along Evelyn Street and Lower Road in LB Southwark will also be affected by the works.
- 8.1.56 Any assessment of the traffic impacts of the site needs to take into consideration the projected growth planned for the wider area, both in LB Lewisham and LB Southwark, as well as planned changes to the highway network. The combined effect of Earl Pumping Station and Chambers Wharf has the potential for significant local impacts in both LB Lewisham and LB Southwark and will affect a wide range of road users.
- 8.1.57 Surrounding development coming forward in the area will result in a predominantly residential environment. Contributions to public realm improvements are therefore necessary in order to ensure the amenity of the area is appropriate for residential activities. The applicant should contribute to public realm improvements at Yeoman Street, including include relaying / replacing any damaged cobblestone carriageway, new paved footways, tactile paving and tree planting.

- 8.1.58 The road safety audit highlights a number of issues associated with HGVs having difficulty accessing the site. These include HGVs having head on collisions, HGVs performing manoeuvres that endanger pedestrians, and conflicts between HGVs and cyclists. The recommendations of the Stage 1 Road Safety Audits should be implemented. However the audits only have a 2 year shelf life, so the proposals ought to be re-audited when the shelf life expires.
- 8.1.59 Without mitigation, the proposed construction works and temporary parking restrictions are likely to result in the displacement of car parking from Yeoman Street and Croft Street. Uncontrolled parking, in particular worker parking in the area for the duration of works may have a negative impact on parking in the surrounding streets. This is likely to be exacerbated in LB Lewisham given the existing Controlled Parking Zone (CPZ) in LB Southwark. A new CPZ in LB Lewisham, surrounding the works site, would mitigate this.
- 8.1.60 The Lower Road gyratory, in LB Southwark, suffers from congestion at peak times and lacks resilience generally. Any additional traffic generated by the Earl Pumping Station site will exacerbate this issue.
- 8.1.61 Given the pressures on the network at peak times it is desirable to limit any additional trips to and from the proposed site, especially HGV trips, to the off peak period. This measure will also be essential to reduce potential conflict between large vehicles from the site and very high level of cyclists traversing the area on CS4. Additionally, it would be appropriate for the project to make a financial contribution toward CS4 / gyratory removal, in order to mitigate these impacts.
- 8.1.62 Considering that cyclists are likely to represent a majority of peak time road users on Lower Road and Evelyn Street by the time of construction, interaction between lorries and cycles will be frequent, especially during peak hours. It is therefore recommended that HGV movements be restricted to off-peak hours.
- 8.1.63 ***As the DCO is currently drafted the local impact is likely to be negative. With the introduction of a CPZ surrounding the works site in LB Lewisham, the local impact on parking is likely to be neutral. The local impact of construction vehicles on the road network and cycle superhighway is likely to be negative.***

Scope for Enhanced Mitigation during Construction

- 8.1.64 In the Council's opinion, much stronger mitigation ought to be provided by the applicant by way of an enhanced and improved CoCP. Comments on the CoCP as currently proposed are provided in Section 9.2 below.

Ongoing Operational Effects

8.1.65 Provided the landscaping and amenity of the area is maintained and improved, and that the equipment is properly maintained and operated the ongoing operational effects are likely to be neutral.

Future Impacts

8.1.66 The site is located within LB Lewisham's Core Strategy designated Regeneration and Growth area which is due to accommodate significant development over the next 10-15 years. Residential development is planned for, and in some cases is under way, on sites surrounding the Earl Pumping Station works site, for example at Yeoman Street and Cannon Wharf. This future residential development in the area will be affected by the works and so the Council wishes to ensure that these effects are taken into account in terms of noise and traffic in particular.

8.2 Deptford Church Street

Local Receptors

8.2.1 The Deptford Church Street site is surrounded by a range of varied environmental and socio-economic receptors and is accessible to large numbers of people. The role of Deptford Church Street as a local thoroughfare and bus route means that any disruption to traffic could discourage shoppers from visiting the area, meaning that the potential receptors include users of the adjacent commercial centre of Deptford High Street.

8.2.2 The ES acknowledges that several of the likely construction-related effects arising from the Deptford Church Street work site will be both significant and adverse. In some cases the Council considers that the likely effects will be greater and more damaging than identified in the ES.

8.2.3 The closest receptors and those that are most susceptible to significant direct adverse construction-related effects are:

- The staff and pupils of St Joseph's school, as regards construction noise, construction dust, traffic safety, and the temporary, but long-term, loss of adjacent green open space.
- The owners, workers and customers of the businesses on Crossfield Street, who are concerned about the ongoing operation of the businesses and proposals to remove all nearby parking facilities.
- Pedestrians on Deptford Church Street, and all those, including dog-walkers, who use the existing green open spaces which will be lost for a period of several years during construction.
- The clergy, visitors and parishioners of St Paul's Church, who will be affected by intrusive construction noise, vibration (from the site itself and also from the main tunnelling process) and dust, as well as the removal of nearby parking facilities.

- Some residents of the Crossfield Estate and residential developments to the south of the railway have scope to suffer visual intrusion associated with construction (including light effects).
- Users of the surrounding road network, who will experience disruption when the work impinges onto Deptford Church Street.
- The trees that will be lost on the site itself (i.e. all of them), and the wider habitats supported by those trees and the grass which covers the majority of the site.
- The Sue Godfrey Nature Park, which is close enough to the site to be affected by construction dust, as are trees and grassed areas to the north and east of the site. The habitat of the Nature Park will suffer due to displaced dog walkers.
- The various nearby historically significant structures (including the listed St Paul's Church, its churchyard wall and the adjacent railway viaduct, and the historic buildings lining Deptford High Street) which have the potential to be affected by vibration and settlement.
- The St Paul's Conservation Area, Deptford High Street Conservation Area and Creekside Conservation Area which will be affected not just during construction, but in the longer term, by changes to the setting to St Paul's Church and Deptford Church Street.
- Underlying archaeology which potentially will be removed or destroyed.

8.2.4 Once construction is complete, the most sensitive receptors are likely to be the users of the green space which will be re-provided once the works are complete and the St Paul's Conservation Area, particularly while the landscaping matures.

Local Impacts

Air Quality and Emissions

8.2.5 The site is located within an air quality management area and the proposals are likely to result in a reduction in air quality, particularly for those sensitive receptors surrounding the works site and particularly in relation to reduced air quality from dust and particulates from construction and transportation.

8.2.6 St Joseph's School and St Paul's Church are two particularly sensitive receptors which require specific mitigation. Children at St Joseph's School spend a large proportion of their day in the outdoor learning environment, particularly 4-5 year olds who typically spend 60-70% of their day outside. The windows and fire doors in the School building are not tightly fitting and will be affected by dust on both the exterior and interior.

8.2.7 The impact of reduced air quality on children's health is a primary concern and therefore dust pollution mitigation for the duration of works should

include the provision of tightly sealed windows, replacement well sealed fire doors, exterior building and window cleaning, and interior cleaning.

- 8.2.8 The impact of dust pollution on St Paul's Church requires mitigation, particularly regarding the operation of the organ. Given the importance of the Grade I listed building as a heritage asset for the community additional exterior cleaning of the Church building is appropriate during construction.
- 8.2.9 **The local impact is likely to be negative.** Mitigation, as mentioned above, may go some way toward addressing some of the negative impacts.

Biodiversity, Biological Environment & Ecology

- 8.2.10 The main ecological receptors are the site itself, the trees within and close to the site, and Sue Godfrey Nature Park. The trees form part of the network of local conservation areas (see ES Vol 23 Figure 7.4.2), with the site itself falling within the St Paul's Conservation Area. There are no suitable sites for replacement open space in the surrounding area (Doc. Ref. 4.1, ES Volume 1 Appendix C, Doc. Ref. 6.2.1).
- 8.2.11 The site itself has ecological value and is designated as a site of importance for nature conservation. The applicant undertook a habitat survey to determine the species on site, but it was carried out in mid-February which is a sub-optimal time of year for identifying notable plant species. The survey 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.
- 8.2.12 As a result of Crossfield Amenity Green being occupied as a works site for an extended period of time during works, there will be knock-on impacts on the ecology of Sue Godfrey Nature Park. Sue Godfrey Nature Park is likely to experience increases in usage and incompatible activities such as dog walking and the associated negative impacts. A contribution towards dog litter bins and maintenance and clean up costs during the works period would go some way towards addressing the impact associated with increased use.
- 8.2.13 The complete loss of all trees within the site, loss of habitat and species and loss of the existing brick wall that divides the site, will take a considerable time to be overcome by post-construction landscaping. Reinstatement of a species rich amenity grassland on a substrate that is suitable for and includes fiddle dock is required. Design principle DEPCS.09 should be amended as follows.

DEPCS.09 – The landscaping of the open space following completion of the construction works shall include reinstatement of a species-rich amenity grassland mix on a substrate that is suitable for and includes the fiddle dock species ~~is required and include the fiddle dock species~~

8.2.14 There are no potential replacement sites in the area. Therefore compensation is appropriate for the impact of knock-on effects on Sue Godfrey Nature Park.

8.2.15 **The local impact is likely to be negative.**

Coastal /River Change

8.2.16 No comment

Compulsory Acquisition and Related Matters

8.2.17 No comment

Design, Landscape and Visual Impact

8.2.18 The amenity of all those using Crossfield Amenity Green, both actively and passively, including those at St Joseph's School, St Paul's Church, the businesses under the railway arches on Crossfield Street, and those using the east-west links between Deptford town centre and Creekside, will be significantly adversely affected for the duration of the works. The amenity of all those using Deptford Church Street, including pedestrians, cyclists, public transport users and drivers will also be significantly adversely affected when the connection works which require Thames Water to take possession of half of the width of the carriageway are in progress.

8.2.19 The site is within View Corridor 6, Blackheath Point, as identified in the Mayor of London's View Management Framework. St Paul's Church is in the middle ground of the View Corridor and the visual management guidance states that the panorama is sensitive to large-scale development in the middle ground. It is unlikely that the permanent above ground structures would have a negative impact on the View Corridor however the final design of the ventilation columns should be considered in this context.

8.2.20 The complete loss of all trees within the site, loss of habitat and species and loss of the existing brick wall that divides the site represent a significant loss to local amenity and will take a considerable time to be overcome by post-construction landscaping.

8.2.21 The visual impact of the works site itself, including hoardings around the site will significantly adversely affect the amenity of all users and passers by. The final design and treatment of these hoardings should be

developed in conjunction with St Joseph's School and St Paul's Church and approved by the Council.

- 8.2.22 In relation to the post-construction landscaping, the submitted Illustrative Proposed Landscape Plan (DCO-PP-22X-DEPCS-230008) does not adequately reflect and incorporate the Council's strategic aspirations for the 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, as set out in Lewisham's 'North Lewisham Links Strategy'.
- 8.2.23 While Requirement DEPCS4 requires details of replacement landscaping to be approved by LB Lewisham, it currently only refers to landscaping and its scope needs to be expanded to include areas outside the immediate works site, such as the adjoining roads, Coffey and Crossfield Streets. The final design must respect the setting and uses and landscaping should not be narrowly confined to zone in which required landscaping would be located (see submitted Illustrative Proposed Landscape Plan (DCO-PP-22X-DEPCS-230008)).
- 8.2.24 The Council's preference is that the costs for implementation of a scheme are agreed between the applicant and the Council and payment is made by the applicant, by way of a s106 obligation, in order for the Council to consult with the local community so as to develop and implement a suitable scheme.
- 8.2.25 The final design of both the permanent above ground structures and the replacement open space and landscaping 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.
- 8.2.26 The final design and location of permanent structures in such a sensitive location must respond to the View Management Corridor, the historic environment and the setting of St Paul's Church and the design should be developed in conjunction with English Heritage. In this respect the height of ventilation columns should be restricted to 6m, rather than 8m.
- 8.2.27 ***As the DCO is currently drafted the local impact is likely to be negative. With the appropriate landscaping and design of above ground structures the overall impact is likely to be positive.*** This depends on appropriate requirements and s106 obligations in place to secure community involvement in the design of the park and to ensure the park is delivered to a high standard that enhances the setting of the listed Church.

Flood Risk and Climate Change

8.2.28 The site lies partly within Flood Zone 2 (see ES Vol 23 Figure 15.3.1), and above the boundary between the 'outer zone' (Zone II) and 'total zone' (Zone III) of a Source Protection Zone defined by the Environment Agency to protect a drinking water abstraction point some way to the south (see ES Figure 13.4.2).

8.2.29 ***The overall impact is likely to be neutral.***

Historic Environment

8.2.30 The Council is concerned about the combined impact of the proposed works on heritage assets in the area, primarily the immediately adjacent Grade I listed St. Paul's Church which is the most significant listed building in the borough. The structural integrity of the building, its setting and ensuring the ongoing operation of the Church are important matters to the Council.

8.2.31 St Paul's Church is also a particularly important heritage asset for the wider community and the external appearance of the building is an important aspect of protecting the heritage asset and ensuring the heritage value of the building continues to be appreciated. The impact of dust from the works site on the external appearance of the Church may be mitigated by a s106 agreement to ensure the outside of the Church is cleaned regularly for the duration of the works.

8.2.32 The functioning of St Paul's Church during the construction phase of project will have an effect upon the ongoing up-keep of the building itself. In order to ensure the on-going operation of the Church during the construction phase of the project, the impact of dust on the organ should be appropriately mitigated and an outreach worker should be available to assist the Church in the additional tasks, such as increased enquiries, maintenance and liaison with the infrastructure provider, that are likely to arise during construction.

8.2.33 Following the works period, the extent of landscaping design of the above ground structures need to respond appropriately to the setting of the conservation areas and the Church. As discussed above, the Council's preferred method of ensuring the landscaping is carried out to a satisfactory standard is for the Council to develop and implement a scheme that is acceptable to the local community and English Heritage, with financial contributions from the applicant.

8.2.34 St Paul's Churchyard wall is Grade II listed, is in poor repair and is at risk of damage from the works, particularly vibration. Appropriate improvements to the wall are necessary, possibly through the retention of the bricks from the existing wall, running roughly north-south across Crossfield Amenity Green, which is to be demolished as part of the works.

- 8.2.35 The curb and cobble stones on Crossfield Street are interesting historical features that should be retained and reinstated. A s106 obligation is needed to ensure this occurs.
- 8.2.36 The site and its surroundings are in an area of general interest for archaeology and therefore all works that are undertaken should comply with accepted practice for archaeological areas. Historical mapping confirms that prior to 1945 the work site itself was occupied by housing. This will influence the potential for the presence of historic artefacts, both as a consequence of the site's occupation in Victorian times and as a consequence of the disruption to surface layers and any earlier remains contained within those layers caused by that Victorian-era construction. A site specific Requirement relating to the submission of an Archaeological Written Scheme of Investigation is necessary to ensure archaeology is appropriately protected and managed.
- 8.2.37 ***As the DCO is currently drafted the local impact, both during construction and during the operational phase, is likely to be negative.*** With the appropriate Requirements and s106 obligations in place to ensure the effective ongoing operation of the Church and with landscaping that respects and enhances the setting of the Church the local impact is likely to be neutral.

Land Use Including Regeneration and Open Space

- 8.2.38 Crossfield Amenity Green will be rendered unavailable and inaccessible for an extended period during construction (at least four years) which will result in the loss of open space in an area of growth with limited existing public open space. The type of alternative open space in the immediate area is not comparable.
- 8.2.39 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.
- 8.2.40 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.

- 8.2.41 The level of new development in the surrounding area will place increasing pressure on the limited remaining open space. The loss of this space during the construction phase will have the effect of concentrating public use, for example for dog walking, on the remaining green open space in the area. This is likely to be detrimental to the quality of all of that additional green space, in particular the open space to the east of St Paul's Church, and the Sue Godfrey Nature Park. A contribution towards dog litter bins and maintenance and clean up costs during the works period would go some way towards addressing the impact associated with increased use.
- 8.2.42 In relation to the post-construction landscaping, the submitted Illustrative Proposed Landscape Plan (DCO-PP-22X-DEPCS-230008) does not adequately reflect and incorporate the Council's strategic aspirations for the 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, as set out in Lewisham's 'North Lewisham Links Strategy', copies of which are available on request.
- 8.2.43 ***The local impact is likely to be negative***, particularly in relation to the loss of open space for an extended period during the construction phase and the associated knock-on effects on surrounding open spaces. ***With the appropriate landscaping the local post construction impact on open space is likely to be positive*** if appropriate requirements and s106 obligations are in place to secure community involvement in the design of the park and to ensure it is delivered to a high standard that considers the east-west links.

Noise and Disturbance

- 8.2.44 St Joseph's School and St Paul's Church are two particularly sensitive receptors which require specific mitigation. Children at St Joseph's School spend a large proportion of their day in the outdoor learning environment, particularly 4-5 year olds who typically spend 60-70% of their day outside. The construction phase is scheduled to last for 4-5 years which will be the entire primary school period for some children. 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.
- 8.2.45 The windows in the School building are not tightly fitting and the impact of noise is likely to affect children's health as well as both the indoor and outdoor teaching and learning environment. Noise mitigation for the duration of works

should include the provision of secondary glazing on all windows at the School.

- 8.2.46 Noise pollution will affect the operation of St Paul's Church during the construction phase of project. The smooth ongoing operation of the Church which in turn will influence the ongoing up-keep of the building itself. The amenity of the Church and its congregation is likely to be adversely affected by the works.
- 8.2.47 Noise impacts are a key issue and are for the most part proposed to be dealt with through the CoCP. It is noted (see paras 4.5.28 and 9.2.74 of the site-specific ES, Volume 23, ref 6.2.23) that the full application of the Code of Construction Practice (CoCP) will be critical to avoiding significant adverse dust effects, as well as to containing noise and vibration effects to the levels that have been assessed. Information on the approach to further noise mitigation is contained in Section 9.8 of the site-specific ES.
- 8.2.48 In order to avoid significant adverse impacts on the particularly sensitive receptors surrounding the Deptford Church Street site, noisy work should be limited to outside school term time or outside the working school day, and outside Church congregation and service times. If necessary, re-housing of pupils during examination periods should be arranged..
- 8.2.49 The following additions to the CoCP Part B are necessary to assist in reducing the disruption to sensitive receptors.
- All reasonable endeavours should be taken to programme particularly noisy work outside of school term time or outside of the working school day (08.30 to 15.30), and Church congregation and service times
 - All reasonable endeavours should be taken to programme vehicle trips to and from the site so that they do not take place between 08.00 and 09.00 and 15.00 and 16.00 Monday to Friday during school term time, and outside of Church congregation and service times.
- 8.2.50 Given the sensitivity of St Paul's Church and St Joseph's Catholic Primary School as receptors an automatic entitlement to noise insulation, without having to demonstrate an entitlement under the CoCP Part A, is appropriate. This should comprise secondary glazing for the entire school building and such other arrangements as may be appropriate.
- 8.2.51 ***The local impact is likely to be negative.*** Avoidance of significant noise impacts is the most effective solution to ensure the on going operation of both St Paul's Church and St Joseph's Catholic Primary School.

Rationale for the Selection of Work Sites and Drive Strategies

- 8.2.52 The site selection of Deptford Church Street and the de-selection of Borthwick Wharf followed a flawed process.
- 8.2.53 Deptford Church Street was introduced at phase two consultation as a selected site. This did not allow a thorough consideration of alternative sites and the assessment process did not involve quantitative assessment or comparison of technical data.
- 8.2.54 The limited early assessment and consideration of alternatives and the absence of technical studies or data result in a flawed site selection process, based only on the judgement of Thames Tideway Tunnel professionals. Paynes and Borthwick Wharf, located off Borthwick Street and with direct Thames River access, were realistic alternatives at earlier site selection phases. These sites are now under construction and are therefore no longer realistic alternative sites. The applicant should give further consideration to alternative sites, following a thorough site selection process.
- 8.2.55 Insufficient information was available at pre-application stage and therefore decisions and processes, particularly in relation to the site selection process and assessing the impact of effects, are fundamentally flawed. Additionally, relevant parties did not have access to accurate and high-quality information on the project and could therefore not adequately review assessments undertaken by Thames Water.
- 8.2.56 Consultation was not carried out in a manner that ensured the participation and ability to influence proposals by LB Lewisham and other parties. The applicant's meeting processes and approach to sharing information and requesting feedback was flawed and did not allow a constructive dialogue between the applicant and the local authority.
- 8.2.57 Deptford Church Street should not have been selected as a preferred site and a thorough review of realistic alternative sites should now be undertaken.

Socio-Economic Effects

- 8.2.58 The site is located in one of the most deprived areas in England and the potential impact on the education of children in an already deprived area is a major issue. The learning environment and journeys to school will be affected. Safety issues arise in relation to construction traffic and changes to the road layout and a suitable alternative fire assembly location for St Joseph's School, supported by a safety audit, has yet to be agreed.
- 8.2.59 Liaison and communication with St Paul's Church, St Joseph's School and the businesses under the arches throughout works period is required. Each party will require a different, tailored, approach. In relation to St Paul's Church, a heritage support worker should be in place in a dedicated role for

maintaining use and increasing awareness about the Church. The applicant should run educational sessions for St Joseph's School, relating to the construction process, water quality and other relevant issues.

- 8.2.60 An outreach worker should be available to assist the Church in the additional tasks, such as increased enquiries, maintenance and liaison with the infrastructure provider, that are likely to arise during construction.
- 8.2.61 The proposed works and opening up Crossfield Street as a through route will have a highly detrimental impact on the existing businesses along Crossfield Street, particularly given that parking and access, both vehicle and pedestrian, would be disrupted and restricted. Every effort should be made to ensure the businesses can remain operational, with access maintained at all times and signage provided by the applicant to show the businesses remain open and accessible. Loading areas should be maintained for the businesses.
- 8.2.62 In August 2012 the Council telephoned each of the businesses to understand better how they used Crossfield Street and what the anticipated effects of the proposed works would have on the operation of their businesses. Cumulatively the businesses estimated upward of 25 cars, 20 vans and 15 lorries visiting per day. Each business has specific access requirements and said it was crucial to their on-going operations that access and parking was maintained.
- 8.2.63 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.
- 8.2.64 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 September 2013 shows that the percentage of people claiming job seekers allowance was 6% in Evelyn Ward and 5.7% in New Cross Ward, compared to 4.7% for Lewisham and 3.6% 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.
- 8.2.65 The applicant's skills and employment strategy focuses on the main drive works sites and does not ensure that LB Lewisham residents are employed

through the project. The Council considers specific targets are necessary to ensure LB Lewisham residents are employed. For example at least 15% of employees hours worked on the project live in LB Lewisham and 10% of those LB Lewisham residents who are employed, were previously unemployed. those boroughs where project worksites are located. In addition, local targets for apprentice workers should be set, for example, one apprentice for every £5 million of spend, are target percentage of which are to be LB Lewisham residents.

- 8.2.66 An additional Requirement is needed to ensure continuous vehicular and pedestrian access is maintained to the existing vehicular and pedestrian access points to St Joseph's School, Arches A to D and St Paul's Church throughout the works.
- 8.2.67 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.
- 8.2.68 Crossfield Amenity Green will be rendered unavailable and inaccessible for an extended period during construction (at least four years) which will result in the loss of open space in an area of growth with limited existing public open space.
- 8.2.69 ***The local impact is likely to be negative.*** The combined impact of the works on the wider area and particularly on sensitive receptors and surrounding uses requires effective mitigation. Additional requirements, a dedicated heritage support worker and educational sessions with St Joseph's Catholic Primary School are essential. Specific employment targets should be set for LB Lewisham residents.

Traffic, Travel and Transportation

- 8.2.70 The Council has serious concerns regarding the transport impacts arising from the use of the site. Congestion and significant disruptions to the surrounding road network are likely. Footpath closures and disruptions to pedestrian routes are proposed as well as disruptions to bus routes and stops, and cycle routes, resulting in associated safety issues.
- 8.2.71 Alternative routes for pedestrians and cyclists for the duration of the construction works period have been identified by the Council and enhancements to these routes, funded by the applicant, are necessary.
- 8.2.72 While the bus lanes are suspended on Deptford Church Street, improvements should be made to the north/south cycle route along Creekside (between Deptford Church street roundabout and Creek Road). The improvements should include new signage, and works to the Reginald Road/ Creekside/

Deptford Church street junction to improve the link across the roundabout (between the cycle path on Deptford Church Street and Creekside).

- 8.2.73 While the Coffey Street toucan crossing is suspended, improvements should be made to the east-west pedestrian and cycle links through the Crossfield Estate (south of the railway) by improving the access to/from the estate close to the Deptford Church Street/Giffin Street junction, changing the signalised pedestrian crossing at the Deptford Church Street/Giffin Street junction to a toucan crossing, and the provision of new signage, (including cycle diversion route and legible London signage).
- 8.2.74 East-west pedestrian and cycle links from Deptford High Street through the site to the east, as set out in Lewisham's 'North Lewisham Links Strategy', will be significantly affected by the proposed works, relocations of the pedestrian crossing and the closure of half of Deptford Church Street.
- 8.2.75 The effects of opening up Crossfield Street as a through route will have impacts on St Joseph's School by channelling traffic past the school entry/exit and the playground gates.
- 8.2.76 The proposed temporary suspension of all parking bays on Coffey Street and Crossfield Street for the duration of construction will have a particular impact on St Joseph's School, parishioners and visitors at St Paul's Church and on the commercial units on Crossfield Street.
- 8.2.77 Clear wayfinding signage and information boards are required in order to assist all road users, including cyclists, public transport users and pedestrians in navigating the footpath / route closures and diversions associated with the works. Improvements to the pedestrian environment and routes around the works site are needed, particularly to the school from Deptford Church Street.
- 8.2.78 The impact of the works upon public safety has the potential to be significant. Changes to pedestrian routes are a particular concern in relation to school children. The applicant should therefore meet the cost of a school crossing patrol (lolly-pop person) for the duration of the works and the cost of any assessment associated with the siting / locating of the school crossing patrol.
- 8.2.79 During the construction phase all temporary bus stops by DDA compliant and have shelters.
- 8.2.80 The road safety audit for Deptford Church Street highlights a number of highway safety issues including pedestrian facilities being compromised, restricted pedestrian/vehicle intervisibility, and vehicles striking barriers and opposing traffic. The safety audit also suggest that HGVs will have difficulty accessing the site, the access issues identified in the audit include HGVs having to undertake difficult manoeuvres, HGVs having to shuffle forward and

backwards to complete a manoeuvre, and the swept path manoeuvres for HGVs being unfeasibly tight. The recommendations of the Stage 1 Road Safety Audits should be implemented. The audits only have a 2 year shelf life and so the proposals should be re-audited when the shelf life expires.

- 8.2.81 An additional Requirement is needed to ensure that continuous vehicular and pedestrian access is maintained to the existing vehicular and pedestrian access points to St Joseph's School, Arches A to D and St Paul's Church throughout the works. See the additional requirements for Deptford Church Street in section 9.1 below.

DEPCSXX – Vehicular and pedestrian access

Notwithstanding what is shown on Plan DCO-PP-2XX-DEPCS-230003, access shall be maintained at all times throughout the construction Works No. 22a and 22b and any associated Ancillary Works to existing pedestrian and vehicular access points on Crossfield Street that serve Arches A to D Crossfield Street, St Josephs Catholic Primary School and St Paul's Church.

- 8.2.82 Without mitigation, the proposed construction works and temporary parking restrictions are likely to result in the displacement of car parking from Coffey Street and Crossfield Street. Uncontrolled parking, in particular worker parking, in the area for the duration of works is likely to have a negative impact on parking in the surrounding streets. A new CPZ in LB Lewisham, surrounding the works site, would mitigate this.
- 8.2.83 In order to avoid significant adverse impacts on the particularly sensitive receptors surrounding the Deptford Church Street site, construction vehicle movements should be limited to outside school term time or outside the working school day, and outside Church congregation and service times.
- 8.2.84 The following additions to the CoCP Part B are necessary to assist in reducing the disruption to sensitive receptors.
- All reasonable endeavours should be taken to programme vehicle trips to and from the site so that they do not take place between 08.00 and 09.00 and 15.00 and 16.00 Monday to Friday during school term time, and outside of Church congregation and service times.
- 8.2.85 Once construction is complete, the applicant should contribute to public realm improvements on Crossfield & Coffey Street (from Deptford Church Street to the area in front on the school). These improvements should tie into the any landscape design and should include relaying / replacing any damaged cobblestone carriageway, new paved footways, tactile paving, school keep clears, school children crossing signs and road markings remarked outside St Josephs Primary School.

8.2.86 The applicant should also contribute to public realm improvements on Deptford Church Street. These improvements should include reinstatement of the carriageway, footway improvements, tactile paving, measures to improve connectivity across Deptford Church Street and tree planting.

8.2.87 ***The local impact is likely to be negative.*** Mitigation in terms of access, signage, alternative routes, safety, parking and construction vehicle times is necessary as an absolute minimum.

Scope for Enhanced Mitigation during Construction

8.2.88 In the Council's opinion, much stronger mitigation ought to be provided by the applicant in an enhanced and improved CoCP. Comments on the CoCP are provided separately in Section 9.2 below.

Ongoing Operational Effects

8.2.89 Once construction is complete, ongoing access to equipment will be required, both above ground and below. The applicant anticipates that once every ten years or so access to the shaft will be required which will result in the open space being unusable for a period of time.

8.2.90 This, combined with the introduction of above ground structures, means that a carefully designed and implemented landscape scheme is essential to the creation of an acceptable afterlife.

8.2.91 An implemented landscaping and streetscape scheme that respects and enhances the setting of St Paul's Church and the Conservation Areas, that responds to the local community's needs, and reflects the Council's strategic aspirations for the area is key to ensuring the ongoing operational impacts are acceptable.

8.2.92 The acceptable design of above ground structures, to a maximum of 6 metres, will influence the acceptability of the ongoing operation effects of the scheme.

8.2.93 Provided the landscaping and amenity of the area is maintained and improved, and that the equipment is properly maintained and operated, and that the above ground structures are of an acceptable scale and design, ***the ongoing operational effects are likely to be neutral.***

8.3 Greenwich Pumping Station

Local Receptors

8.3.1 A general description of the Greenwich Pumping Station site can be found in Section 6.4 of this report. This section identifies more specifically those

elements of the site and its setting which constitute sensitive receptors within LB Lewisham which could be significantly affected by the proposed works.

8.3.2 The receptors in LB Lewisham that are likely to be affected by the works at the Greenwich Pumping Station include the following:

- Future residents of the Faircharm Industrial Estate who may be affected by construction noise, dust and visual intrusion (including lighting), particularly during periods of 24-hour working.
- Employees of, and visitors to, the employment units within the Faircharm Industrial Estate, and everyone associated with the Creekside Educational Trust's building and field centre located between the Faircharm Industrial Estate and the railway viaduct, who may be affected by construction noise, dust and visual intrusion, including disturbance to the ecology of Deptford Creek. Local schoolchildren (and others) regularly participate in 'mud walks' in Deptford Creek organized by the Trust.
- The ecosystem of Deptford Creek itself, which is 'shared' by LB Lewisham and the Royal Borough of Greenwich.
- Employees of, and visitors to, the employment units to the north of the railway embankment, which will be directly opposite the materials handling area, who may be affected by construction noise, dust and visual intrusion.
- Employees and students of, and visitors to, the Trinity Laban Conservatoire of Music and Dance and its open space, who may be affected by construction noise, dust and visual intrusion.

8.3.3 It is unlikely that impacts within LB Lewisham will spread further than these receptors. Residents of the Crossfield Estate are likely to be shielded by the existing and future buildings on the Faircharm Industrial Estate, and are far enough away from the Greenwich Pumping Station not to be unduly affected by normal construction activities. The main GFT will, however, pass below the buildings of the Crossfield Estate, and there is scope for them to be affected by in-tunnel noise and vibration, and in particular effects associated with the supply 'trains' which will transport tunnelling sections throughout the main tunnelling works period.

Local Impacts

Biodiversity, Biological Environment & Ecology

8.3.4 The Council is concerned that the impact on Deptford Creek has not been thoroughly assessed. It is proposed that chalk spoil from the tunnel boring machine in the GFT will be handled in liquid form and transported by pipeline to a location within Phoenix Wharf, where it will be de-watered and rendered fit for transport by road and for disposal as a caked material.

- 8.3.5 To achieve this, the slurry will be handled, processed and stored adjacent to Deptford Creek. However no potential impacts on Deptford Creek have been identified (para 5.1.2 of the site specific ES for Greenwich Pumping Station (ref 6.2.24)).
- 8.3.6 Large volumes of chalk slurry and cake will be handled adjacent to the creek, and during the period concerned it is certain that heavy rainfall will at times occur. Such rainfall may mobilise particles of chalk, which could be washed into the creek, which would generate significant adverse effects which would vary with the season and with the state of the tides. As the local authority responsible for half of Deptford Creek, the Council is not satisfied that the likely effects of the works at Greenwich Pumping Station have been properly assessed by the applicant.
- 8.3.7 Although Part A of the CoCP identifies the need for measures to protect water courses from run-off and general pollution, the scale of what is proposed at this location (as a main tunnelling drive site) requires more specific solutions, through the introduction of a specific section within the CoCP Part B.
- 8.3.8 A beneficial side effect of handling the chalk as a slurry is that dust effects will be considerably reduced compared to conventional stockpiling and re-loading of dry spoil.

Traffic, Travel and Transportation

- 8.3.9 Significant road movements are expected to arise from the Greenwich Pumping Station site. Daily lorry movements will exceed 80 per day (40 lorries each way: roughly twice the peak level at the two LB Lewisham sites). The Council is concerned at this level of road traffic and the cumulative transport effects of multiple Thames Tunnel sites and multiple large developments coming forward in both LB Lewisham and the Royal Borough of Greenwich should be thoroughly considered and assessed in the ES. This does not appear to have been done.
- 8.3.10 The scope for increased barge movements, using Deptford Creek, and reducing road traffic from the Greenwich Pumping Station site is encouraged however it is noted that when the bridge is lifted to allow barge movements, the road is closed to all traffic (pedestrians, cyclists and vehicles) for more than ten minutes. Frequent lifting of the bridge could result in traffic congestion and rat-running from the strategic road network onto residential roads. The scope for increased barge movements should be investigated further and the impact on the highway network should be assessed.
- 8.3.11 The works involve diversion of the pedestrian and cycle path over Deptford Creek from Ha’Penny Bridge to Norman Road for a period of around 5 years from 2016 to 2021. This is a strategically important link, allowing east-west connections over Deptford Creek and although the path would be diverted,

rather than closed, it would run through a busy construction site. In addition, Norman Road would have a large number of lorries which along with the works in general will significantly impact on the attractiveness and directness of the route.

- 8.3.12 Pedestrian / cycle improvements to the Creekside area, possibly providing an alternative route to Deptford Bridge DLR, are appropriate for the duration of the works.

9.0 DCO Obligations

9.1 Requirements

- 9.1.1 The Council's proposed revisions set out below take account of proposed revisions to the Requirements in the published Development Consent Order application that were circulated by the applicant in June 2013.

Project-wide Requirements

PW1 – Interpretation/definitions

Need to repeat the definition of “relevant planning authority” from Part 1 of the Order and use this term throughout the Requirements (Definition from Part 1: “means the council of the relevant London Borough and any successors to its function as planning authority for the area in which land to which the provisions of this Order apply is situated”)

Need to include a definition of Travel Plan.

Need to include a definition of Construction Traffic Management Plan. This should include details of any proposed alterations to vehicular and pedestrian accesses and proposed lorry routeing.

Need to include a definition of River Transport Management Plan. This should include expected numbers of barge movements, the expected timing of these barge movements and details of mitigation measures to minimise the adverse impacts on the areas surrounding the construction sites if, despite the use of all reasonable endeavours, the use of river transportation is unavailable and the use of road transport is required.

Need to define Arboricultural Report. This should make clear that it will set out the findings of a tree survey of trees within and within 50m of the Limits of Land to be Acquired or Used, with the survey having been carried out within three months of the anticipated start of construction on the relevant site.

PW3 - Phasing authorises development – Project Wide

The proposed construction phasing of the project setting out the sequence of works along the route of the Thames Tideway Tunnel shall be ~~sent~~ **submitted in writing** to

the local planning authorities for information, prior to **at least two months before** the **scheduled** commencement of development.

PW4 – Phasing of authorised development – Site Specific

Prior to the commencement of development of each of the work numbers 2 to 27, the proposed phasing of the authorised project on the site shall be submitted **in writing** to the local **relevant** planning authority for information **at least two months before the scheduled commencement of development.**

In so far as there are revisions to the construction phasing, they shall be submitted **in writing** to the local **relevant** planning authority for information only on an annual a **monthly** basis.

PW6 – CoCP Part A

The works to construct the Thames Tideway Tunnel shall be carried out in accordance with the Code of Construction Practice (Part A) subject to site specific amendments through the approval of a revised Code of Construction Practice (Part B), unless otherwise agreed **in writing** by the relevant local planning authority, in consultation with other relevant stakeholders.

PW7 – Design principles

“The works to construct the Thames Tideway Tunnel will be carried out in accordance with the Design Principles unless otherwise approved **in writing in advance of works being implemented** by the local **relevant** planning authority.”

PW8 – Air Management Plan

The authorised development shall be operated and maintained in accordance with the Air Management Plan, unless otherwise approved **in writing** with by the Greater London Authority in consultation with the local **relevant** planning authorities.

PW9 – Monitoring of listed buildings and structures

1) Where monitoring of effects on any listed building or structure is proposed instrumentation and monitoring equipment shall be temporarily attached in accordance with the principles set out in [section 3.7 of] the Heritage Statement unless otherwise approved **in writing in advance of equipment being attached** by the local planning authority in consultation with English Heritage.

2) Prior to undertaking any intrusive protective works or mitigation which might affect the heritage significance of any Listed buildings or structures, either during construction or to mitigate the effects of construction, details of these works shall be submitted to and approved **in writing in advance of any such works or mitigation being undertaken** by the local planning authority in consultation with English Heritage.

3) The works ~~will be done~~ **shall be undertaken** in accordance with the approved details unless otherwise agreed **in writing** by the local **relevant** planning authority in consultation with English Heritage.

PW10 – Built Heritage

1) Prior to demolition or removal of the built heritage assets set out in appendix C of the Overarching Archaeological Written Scheme of Investigation (WSI) a Site Specific Archaeological WSI (which shall accord with the Overarching Archaeological WSI) setting out how the asset shall be recorded shall be submitted to and approved **in writing** by the relevant local planning authority in consultation with English Heritage.

2) The Site Specific Archaeological WSI shall be undertaken in accordance with the approved details unless otherwise agreed in writing by the relevant planning authority in consultation with English Heritage.

PWXX – Signage for temporary footpath diversion

1) Prior to implementing any temporary diversion of a public right of way a scheme for temporary signage at points of changes in direction shall be submitted to and approved by local planning authority in consultation with the relevant highway authority.

2) The signs shall be erected and maintained as approved throughout the period of construction unless otherwise agreed **in writing** by the local planning authority.

PWXX – CoCP Part A 'liaison plan'

CoCP A (para 3.1.2) requires a 'liaison plan' and identifies points of contact. This should be an additional requirement.

Earl Pumping Station Requirements

EARPS1 - CoCP Part B

The authorised development shall be carried out in accordance with the CoCP Part B **for Earl Pumping Station**, unless otherwise approved **agreed in writing** by ~~local~~ **the relevant** planning authority in consultation with other relevant stakeholders.

EARPS2 - Detailed design approval for permanent above ground structures

(1) Prior to the commencement of the cladding of the permanent above ground shaft structure and permanent above ground structures for interception chamber and ventilation structures the design of the cladding (including external appearance and materials) which shall accord with the ~~e~~**Design p**Principles for this site and the Site Works Parameter Plan shall be submitted to and approved **in writing** by the ~~local~~ **relevant** planning authority.

(2) The authorised development shall be carried out in accordance with the approved details unless otherwise approved **agreed in writing** by the ~~local~~ **relevant** planning authority.

EARPS3 - Contaminated land

(1) Site specific remediation strategy

Remediation works shall not be commenced until a site specific remediation strategy, in accordance with the CoCP Part A, has been submitted to and approved **in writing** by the ~~local~~ **relevant** planning authority, in consultation with the Environment Agency. The remediation works on this site shall be carried out in accordance with

the site specific remediation strategy **unless otherwise agreed in writing by the relevant planning authority.**

(2) Unexpected contamination

If in undertaking any works on this site, contamination not previously identified is found to be present at the site, then unless otherwise agreed by the local planning authority, no further development or works shall be carried out in the part of the site in which the contamination has been identified until a remediation strategy has been submitted to and approved **in writing** by the ~~local~~ relevant planning authority, in consultation with the Environment Agency. The remediation works on this site shall be carried out in accordance with that remediation strategy **unless otherwise agreed in writing by the relevant planning authority.**

EARPS4 - Archaeology

1) Prior to undertaking any excavation a Site Specific Archaeological Written Scheme of Investigation (WSI) (which shall accord with the Overarching Archaeological WSI) shall be submitted to and approved **in writing** by the ~~local~~ **relevant** planning authority in consultation with English Heritage.

2) The archaeological works shall be undertaken in accordance with the Site Specific Archaeological WSI and carried out by a suitably qualified person or body.

EARPS5 - Landscaping

1) Before commencing construction of the permanent above ground structures, details of the permanent landscaping for this site shall be submitted to and approved **in writing** by the ~~local~~ **relevant** planning authority. ~~in consultation with English Heritage where appropriate.~~ Such details shall be in accordance with the indicative features on Landscape Plan (Drawing No. DCO-PP-21X-EARPS-220008) and the ~~d~~Design ~~p~~Principles for this site.

2) The landscaping details in paragraph (1) above must, unless otherwise agreed **in writing** by the ~~local~~ **relevant** planning authority, include details of all proposed hard and soft landscaping works, including:

- a) location, number, species, size and planting density of any proposed planting;
- b) cultivation, importing of materials and other operations to ensure plant establishment;
- c) proposed finished ground levels;
- d) hard surfacing materials;
- e) minor structures such as lighting; and
- f) details of fencing/enclosures

3) The authorised development shall be carried out in accordance with the approved details unless otherwise ~~approved~~ **agreed in writing** by the ~~local~~ **relevant** planning authority.

EARPS6 – Construction Traffic Management Plan

1) Works no.21a **and 21b and any Ancillary Works** shall not commence until a **Traffic Management Plan** (which shall accord with the CoCP **Part A and relevant Part B**) shall be submitted to and approved **in writing** by the ~~local~~ **relevant** planning authority in consultation with Transport for London.

2) The development shall be carried out in accordance with the approved details unless otherwise ~~approved~~ **agreed in writing** by the ~~local~~ **relevant** planning authority in consultation with Transport for London.

EARPS7 - Travel Plan

1) Works no. 21a **and 21b or any Ancillary Works** shall not commence until a site-specific construction workforce **Travel Plan or Plans** in accordance with the Draft Project Framework Travel Plan has been submitted to and approved **in writing** by the ~~local~~ **relevant** planning authority.

2) The approved travel plan(s) shall be implemented from the commencement of development of work no. 21a **and 21b and any Ancillary Works and** shall continue to be in place for the duration of the construction works, unless otherwise ~~approved~~ **agreed in writing** by the ~~local~~ **relevant** planning authority.

EARPS8 - Specification of accesses (**Construction and Operational and construction**)

1) Before alterations are made to any existing access or any new access is provided, details of the design of such alterations or new accesses shall be submitted to and approved **in writing** by the ~~local~~ **highway relevant planning** authority and any such works shall be completed prior to the commencement of their use.

2) The works shall be carried out in accordance with the approved details unless otherwise ~~approved~~ **agreed in writing** by the ~~highway~~ **relevant planning** authority.

EARPS9 - Surface water drainage

1) Prior to the commencement of the permanent above ground structures written details of the surface and foul water drainage system for this site (including means of pollution control and written details including how the scheme shall be maintained and managed after completion) in accordance with the **Design Principles** for this site shall be submitted to and approved **in writing** by the ~~local~~ relevant planning authority, in consultation with the Environment Agency.

2) The surface and foul water drainage system must be constructed in accordance with the submitted details unless otherwise ~~approved~~ **agreed in writing** by the ~~local~~ **relevant** planning authority in consultation with the Environment Agency and completed prior to use of **Works No 21a and 21b**.

Additional Requirements for Earl Pumping Station

EARPSXX – Protection of Street Trees

1) Work Nos. 21a and 21b or any Ancillary Works shall not commence until a scheme setting out measures for the protection of existing trees in the public highway along Croft Street (as identified on Drawing DCO-PP-21X-EARPS-220002) has been submitted to and approved in writing by the relevant planning authority.

2) The approved tree protection measures shall be implemented and maintained in place throughout construction work unless otherwise agreed in writing by the relevant planning authority.

EARPSXX – Removal and reinstatement of existing marker stone

The existing marker stone 'SPD 1897: SQMR 1871' located in the existing vehicular access crossover serving Nos. 64-72 Croft Street shall be removed before Work Nos. 21a and 21b or any Ancillary Works commence, stored in a secure and safe place and reinstated in the same location in any new vehicular access crossover or reinstated footway as part of reinstatement works once the main authorised construction activities are complete.

EARPSXX – Additional contamination

In addition to EARPS3 - Contaminated land, the required remediation scheme when implemented in full shall include verification of all measures, or treatments required; and relevant correspondence (including other regulating authorities and stakeholders involved with the remediation works) to verify compliance requirements, necessary for the remediation of the site have been implemented in full.

The closure report shall include verification details of both the remediation and post-remediation sampling/works, carried out (including waste materials removed from the site); and before placement of any soil/materials is undertaken on site, all imported or reused soil material must conform to current soil quality requirements as agreed by the authority. Inherent to the above, is the provision of any required documentation, certification and monitoring, to facilitate condition requirements.

Applicants should also be aware of their responsibilities under Part IIA of the Environmental Protection Act 1990 to ensure that human health, controlled waters and ecological systems are protected from significant harm arising from contaminated land. Guidance therefore relating to their activities on site, should be obtained primarily by reference to DEFRA and EA publications.

CONS: Construction

You are advised that all construction work should be undertaken in accordance with the "London Borough of Lewisham Code of Practice for Control of Pollution and Noise from Demolition and Construction Sites" available from the Environmental Health Office, Wearside Service Centre, Wearside Road , Lewisham, SE13 7EZ Tel No. 020 8314 6789.

Air Quality/Odour: Air Quality/Odour Abatement/Monitoring

Where contaminants or substances of concern may be an issue – measures must be in place to ensure abatement of contaminants/odours arising from site activities; and monitoring facilitates in place to evaluate emissions and contingency plans in place for dealing with episodes of this nature.

DUST: Dust Minimisation

In preparing the scheme of dust minimisation, reference shall be made to the London Councils Best Practice Guide: The Control of Dust and Emissions from Construction and Demolition. All mitigation measures listed in the Guide appropriate to the size,

scale and nature of the development will need to be included in the dust minimisation scheme.

DRN: Drainage

You are advised to contact the Council's Drainage Design team on 020 8314 2036 prior to the commencement of work.

Deptford Church Street Requirements

DEPCS 1 - CoCP Part B

The authorised development shall be carried out in accordance with the CoCP Part B **for Deptford Church Street**, unless otherwise ~~approved~~ **agreed in writing** by ~~local~~ **relevant** planning authority in consultation with other relevant stakeholders.

DEPCS 2 - Detailed design approval for permanent above ground structures

- 1) Prior to the commencement of construction of any permanent above ground structure, the design (including external appearance and materials) which shall accord with the **Design Principles** for this site and the Site Works Parameter Plan (Drawing No. DCO-PP-22XDEPCS-230005) shall be submitted to and approved **in writing** by the ~~local~~ **relevant** planning authority in consultation with English Heritage.
- 2) The authorised development shall be carried out in accordance with the approved details unless otherwise ~~approved~~ **agreed in writing** by the ~~local~~ **relevant** planning authority in consultation with English Heritage.

DEPCS 3 - Detailed design approval for signature ventilation columns

- 1) Prior to the commencement of development of the signature ventilation columns details of the height, external appearance and materials which shall accord with the ventilation column type C (Drawing No. DCO-PP-9000-ZZZZZ-290003) drawings (section 29 of the Book of Plans) shall be submitted to and approved in writing by the ~~local~~ **relevant** planning authority in consultation with English Heritage.
- 2) The authorised development shall be carried out in accordance with the approved details unless otherwise ~~approved~~ **agreed in writing** by the ~~local~~ **relevant** planning authority in consultation with English Heritage.

DEPCS 4 - Landscaping

- (1) Before commencing construction of the permanent above ground structures works for this site, details of the permanent landscaping for this site **including the treatment of public highways** shall be submitted to and approved **in writing** by the ~~local~~ **relevant** planning authority. Such details shall be in accordance with the **Design Principles** for this site, unless otherwise ~~agreed in writing~~ by the ~~local~~ **relevant** planning authority in consultation with English Heritage, **and shall include details of trees, planting, hard surface materials, bollards, seating, lighting (columns and level of luminosity) and other street furniture, play equipment, screens and walls and bird boxes.**
- 2) The authorised development shall be carried out in accordance with the approved details unless otherwise ~~agreed in writing~~ **agreed in writing** by the ~~local~~ **relevant** planning authority in consultation with English Heritage.

Replacement ~~trees~~ landscaping

~~2)~~ **3)** If within a period of [five years] from the date of the planting of any tree **or plant** that tree **or plant**, or any tree **or plant** planted in replacement for it is uprooted or destroyed or dies, another tree **or plant** of the same species and size as that originally planted shall be planted at the same place, unless the local **relevant** planning authority gives its written consent to any variation.

DEPCS 5 - Contaminated land

(1) Site specific remediation strategy

Remediation works shall not be commenced until a site specific remediation strategy, in accordance with the CoCP Part A, has been submitted to and approved **in writing** by the ~~local~~ **relevant** planning authority, in consultation with the Environment Agency. The remediation works on this site shall be carried out in accordance with the site specific remediation strategy **unless otherwise agreed in writing by the relevant planning authority.**

(2) Unexpected contamination

If in undertaking any works on this site, contamination not previously identified is found to be present at the site, then unless otherwise agreed **in writing** by the ~~local~~ **relevant** planning authority, no further development or works shall be carried out in the part of the site in which the contamination has been identified until a remediation strategy has been submitted to and approved **in writing** by the **relevant** ~~local~~ planning authority, in consultation with the Environment Agency. The remediation works on this site shall be carried out in accordance with that remediation strategy **unless otherwise agreed in writing by the relevant planning authority.**

DEPCS 6 - Construction Traffic Management Plan

1) **Work nos. 22a and 22b and any Ancillary Works** shall not commence until a Construction Traffic Management Plan **or Plans** (which shall accord with the CoCP **Part A and relevant CoCP Part B**) shall be have been submitted to and approved **in writing** by the ~~local~~ **relevant** planning authority in consultation with Transport for London. **The Traffic Management Plan shall include details of temporary footway diversions, temporary bus stops and temporary pedestrian crossings.**

2) ~~The development~~ **The Works** shall be carried out in accordance with the approved details **Plans** unless otherwise approved **agreed in writing** by the ~~local~~ **relevant** planning authority in consultation with Transport for London.

DEPCS 7 Travel Plan

1) ~~Work no 22a~~ **Work Nos 22a and 24b or any Ancillary Works** shall not commence until a site-specific construction workforce Travel Plan **or plans** in accordance with the Draft Project Framework Travel Plan has been submitted to and approved **in writing** by the ~~local~~ **relevant** planning authority.

2) The approved Travel Plan(s) shall be implemented from the commencement of development of ~~work no.~~ **Work Nos. 22a and 22b or any Ancillary Works** and shall continue to be in place for the duration of the construction works, unless otherwise approved **agreed in writing** by the ~~local~~ **relevant** planning authority.”

DEPCS 8 - Highway works

1) Before carrying out **permanent** works to ~~the~~ **Deptford Church Street**, Crossfield Street, **Coffey Street**, the details of those works shall be submitted to and approved **in writing** by the ~~local highway~~ **relevant planning** authority (**which, with regard to proposed works to Deptford Church Street, shall be in consultation with Transport for London**)

2) The works shall be carried out in accordance with the approved details unless otherwise approved **in writing** by the ~~local highway~~ **relevant planning** authority (**which, with regard to proposed works to Deptford Church Street, shall be in consultation with Transport for London**).

DEPCS 9 - Specification of accesses (operational and construction)

1) Before alterations are made to any existing access or any new access is provided to **Deptford Church Street, Crossfield Street or Coffey Street**, details of the design of such alterations or new accesses shall be submitted to and approved **in writing** by the ~~local highway~~ **relevant planning** authority (**which, with regard to proposed alterations/new accesses on Deptford Church Street, shall be in consultation with Transport for London**) and any such works shall be completed prior to the commencement of their use.

2) The works shall be carried out in accordance with the approved details unless otherwise approved **agreed in writing** by the ~~highway~~ **relevant planning** authority (**which, with regard to proposed alterations/new accesses on Deptford Church Street, shall be in consultation with Transport for London**).

DEPCS 10 - Surface water drainage

1) Prior to the commencement of the permanent above ground structures written details of the surface and foul water drainage system for this site (including means of pollution control and written details including how the scheme shall be maintained and managed after completion) in accordance with the **Design Principles** for this site shall be submitted to and approved **in writing** by the ~~local~~ **relevant planning** authority, in consultation with the Environment Agency.

2) The surface and foul water drainage system must be constructed in accordance with the submitted details unless otherwise ~~approved~~ **agreed in writing** by the ~~local~~ **relevant** planning authority in consultation with the Environment Agency and completed prior to use of **Works No 22a and 22b**.

DEPCS 11 - Archaeological works

1) Prior to undertaking any excavation a Site Specific Archaeological Written Scheme of Investigation (WSI) (which shall accord with the Overarching Archaeological WSI) shall be submitted to and approved **in writing** by the ~~local~~ **relevant** planning authority in consultation with English Heritage.

2) The archaeological works shall be undertaken in accordance with the Site Specific Archaeological WSI and carried out by a suitably qualified person or body.

Additional Requirements for Deptford Church Street

DEPCSXX – School fire and emergency assembly point

(i) Notwithstanding what is shown on Plan DCO-PP-2XX-DEPCS-230003, prior to the commencement of construction of Work No. 22 and any associated Ancillary Works, details of a proposed alternative fire and emergency assembly point (or points) for staff and pupils of and visitors to St Josephs Catholic Primary School shall be submitted to and approved in writing by the relevant planning authority in consultation with the London Fire and Civil Defence Authority. The details shall include the size of the proposed point (or points), estimates of their capacity, pedestrian and vehicular access arrangements and a safety audit into their acceptability.

(ii) The approved point (or points) shall be made available for use before the commencement of any construction works and maintained throughout the construction period.

DEPCSXX – Vehicular and pedestrian access

Notwithstanding what is shown on Plan DCO-PP-2XX-DEPCS-230003, access shall be maintained at all times throughout the construction Works No. 22a and 22b and any associated Ancillary Works to existing pedestrian and vehicular access points on Crossfield Street that serve Arches A to D Crossfield Street, St Josephs Catholic Primary School and St Paul's Church.

DEPCSXX- Demolition and site clearance

The brick wall and trees identified on Drawing DCO-PP-22X-DEPCS-230004 shall not be removed before a contract for the carrying out of Works 22a and 22b has been made.

9.2 Controls on Site Working

Introduction

9.2.1 It is common practice for large projects with multiple sites to adopt the approach that has been taken in this case, of having a common 'core' set of requirements governing construction practice (in this case in Part A of the CoCP) and a series of site-specific requirement (in this case in multiple Part B documents).

9.2.2 It is also common practice for the CoCP to establish principles which then have to be drawn together within a Construction Environmental Management Plan (CEMP).

- 9.2.3 The ES depends heavily on what is stated in the CoCP in order to deliver an assessment that certain effects are either not significant or are not capable of further at-site mitigation.
- 9.2.4 The Council's view is that Part A of the CoCP is not satisfactory and the site-specific Part B documents are insufficiently detailed and precise. In combination they do not provide the level of environmental protection that is appropriate, or an appropriate level of guidance regarding the development of a CEMP.

Part A: Structural Issues

- 9.2.5 Whereas it is easy to see the relationship between Part A of the CoCP and the ES, it is much harder to see its relationship to what actually happens on construction sites. This is because the real-life construction process is not organised in a thematic way, but by processes. Construction work develops in a predictable sequence from site establishment, clearance and preparation through (for example) groundworks, concreting, plant erection and installation, commissioning and testing (though the details will always vary according to the nature of the works being carried out).
- 9.2.6 To have a good chance of being fully and seamlessly implemented, a CoCP (and more particularly the CEMPs and the procedures that flow from it) should be organised to reflect the specifics of the construction process, so that a subcontractor detailed to (for example) erect the site hoarding, or to carry out site clearance, finds in one place all of the necessary standards and obligations which he is expected to deliver, whether they relate to noise, dust, tree protection or lighting (etc), rather than having to know that those obligations may exist, and having to find them in a thematically-organised CoCP or CEMP.
- 9.2.7 In this case the CoCP requires each site main contractor (see para 2.3.2 of Part A of the CoCP, ref 6.2.01) to produce a site-specific CEMP that will contain all of the following elements:
- a pollution incident response plan;
 - an emergency preparedness plan;
 - a lighting management plan;
 - a traffic management plan;
 - a noise and vibration management plan;
 - an air quality management plan;
 - a water management plan;
 - details of site assessment and remediation (not described as a plan, but comparable in nature);
 - a site waste management plan;
 - an ecology and landscape management plan;
 - a heritage management plan;
 - a community liaison plan; and

- resource management plans (with separate sub-plans covering water use, energy use and materials use).

9.2.8 Elsewhere within the CoCP are further requirements regarding other plans that are to be prepared, as follows:

- a construction phase plan (para 2.3.1);
- a project incident plan (para 3.1.5);
- a pollution incident control plan (para 4.10.6);
- a green travel plan (para 4.15.1);
- a construction logistics plan (para 5.1.6);
- a system for monitoring and reporting on driver training and licensing (para 5.2.1(e)); and
- a management and eradication plan for invasive species (para 11.4.2).

9.2.9 It is inevitable that there will be considerable overlap between several of these elements (e.g. between the pollution incident control plan and the pollution incident response plan; and between the construction logistics plan, the resource management plans and the traffic management plan). This is a recipe for confusion.

9.2.10 It would be appropriate to have a single process-oriented Construction Management Plan which balances all of the above environmental requirements, alongside (among other things) health and safety requirements, site security considerations, and employment law requirements. This would make it easier for the main contractor to generate co-ordinated and balanced work procedures appropriate to the tasks which will be carried out at the site concerned (ideally linked to the project management software being used, so that each task is clearly cross-referenced to relevant procedures). It would also make it easier for external parties (e.g. the Council) to check how concerns are to be addressed, and make it more likely that environmental considerations will be properly built into (for example) site staff induction procedures and briefings.

9.2.11 An emphasis on ensuring satisfactory outcomes rather than writing multiple plans is particularly relevant with sites such as those within LB Lewisham, which are only expected to employ small numbers of staff. Table 10.2.1 in each of the ESs for Earl Pumping Station and Deptford Church Street sites (ref 6.2.22 and 6.2.23) estimate the total workforce strength at 40 persons at each of the two sites: 15 site managers, 20 site workers and 5 client representatives.

Part A: Content Issues

9.2.12 It is assumed that there is a more limited scope for achieving changes to Part A of the CoCP and that changes to the proposed Part B plans will be more readily made.

9.2.13 Nevertheless, it is worth noting that although the chalk tunnelling spoil from the GFT is to be managed as a slurry, there is no mention in Part A of the CoCP of specific procedures or challenges appropriate to slurry handling. This is a major oversight given the proximity of more than one tunnelling drive site to the Thames and its tributaries (e.g. Deptford Creek). The only mention of 'slurry' in any of the CoCP Part B plans is in the Chambers Wharf Part B document, and that is in relation to the control of plant noise rather than the management of risks to the water environment.

Part B: Content Issues at Earl Pumping Station

9.2.14 Some elements of the existing CoCP controls (whether in Part A or B of the proposed CoCP) are acceptable, particularly those relating to good practice measures for the control of noise and dust from work sites.

9.2.15 The issues at Earl Pumping Station of particular importance for LB Lewisham (and LB Southwark) are set out below. Inclusion within the list below should not be interpreted as suggesting that the matter is not already dealt with within the draft CoCP.

- Site specific air quality and dust monitoring for naphthalene to be included during the excavation of the contaminated soils on site.
- More specific and detailed controls should be put into Part B to restrict noisy and dust-generating activities outside standard site working hours,
- Local residents should be invited to co-operate in a comprehensive pre-commencement programme of noise and dust monitoring so that baseline conditions are fully understood, and residents are properly informed regarding noise and dust issues before they arise.
- Section 6 of Part B should also refer to the need to involve person(s) suitably qualified in the measurement and management of ground-borne noise and vibration (or this could be dealt with by amending Section 6.7 of Part A).
- Further consideration should be given to extending the portion of the site hoarding to be provided to a height of 3.6m (rather than 2.4m). At present the only area offered such protection is an undefined area close to No.62 Croft Street. This matter should be considered in light of the fact that noise effects are expected to be significant at this site.
- Further consideration should be given to the provision of additional noise (and dust) enclosures within the work site. In particular, consideration should be given to whether certain pieces of equipment (e.g. air compressors, pumps or emergency generators) or processes could be restricted to locations inside the existing site buildings.
- Further consideration should be given to site layout in an effort to reduce to a minimum the double handling of excavation spoil (as a way of reducing noise and dust).
- Site deliveries should be organised in such a way as to reduce to a minimum the total number of HGV movements. More frequent part-load

deliveries (as might be required for a 'just-in-time' logistics plan) should be actively discouraged.

- Stockpiles of excavation waste should be protected from the effects of heavy rainfall as a way of preventing run-off with entrained silt / soil particles. Interceptors and settlement tanks should be used to maintain an acceptable quality of surface water run-off where appropriate.
- No re-fuelling of vehicles should take place on site, and the storage of fuel, oil and other potentially hazardous chemicals should be minimised.
- Mains power should be used to the greatest possible degree, with no use of generators other than in an emergency.
- Artificial light levels outside the site should be no brighter than existing conditions.
- The height and scale of all cranes to be used on site should be kept to a minimum consistent with public safety.
- All concrete used on site should be delivered as pre-mixed concrete, with no use of on-site concrete batching.
- Provision should be made to harvest rainwater from the roofs of the existing Earl Pumping Station for use on site where potable-quality water is not required (e.g. for wheel washes, damping down of dust etc).

Part B: Content Issues at Deptford Church Street

9.2.16 Some elements of the existing CoCP controls (whether in Part A or B of the proposed CoCP) are acceptable, particularly those relating to good practice measures for the control of noise and dust from work sites.

9.2.17 The issues at Deptford Church Street of particular importance for LB Lewisham are set out below. Inclusion within the list below should not be interpreted as suggesting that the matter is not already dealt with within the draft CoCP.

- All reasonable endeavours should be taken to programme particularly noisy work outside of school term time or outside of the working school day (08.30 to 15.30), and Church congregation and service times
- All reasonable endeavours should be taken to programme vehicle trips to and from the site so that they do not take place between 08.00 and 09.00 and 15.00 and 16.00 Monday to Friday during school term time, and outside of Church congregation and service times.
- More specific and detailed controls should be put into Part B to restrict noisy and dust-generating activities outside standard site working hours.
- St Paul's Church and St Joseph's Primary School should be invited to co-operate in a comprehensive pre-commencement programme of noise and dust monitoring so that baseline conditions are fully understood, and to ensure that they are properly informed regarding noise and dust issues before they arise.
- Section 6 of Part B should also refer to the need to involve person(s) suitably qualified in the measurement and management of ground-borne

noise and vibration (or this could be dealt with by amending Section 6.7 of Part A).

- Further consideration should be given to the provision of additional noise (and dust) enclosures within the work site, including for equipment such as air compressors, pumps and emergency generators.
- Further consideration should be given to site layout in an effort to reduce to a minimum the double handling of excavation spoil (as a way of reducing noise and dust).
- Site deliveries should be organised in such a way as to reduce to a minimum the total number of HGV movements. More frequent part-load deliveries (as might be required for a 'just-in-time' logistics plan) should be actively discouraged.
- Stockpiles of excavation waste should be protected from the effects of heavy rainfall as a way of preventing run-off with entrained silt / soil particles. Interceptors and settlement tanks should be used to maintain an acceptable quality of surface water run-off where appropriate.
- No re-fuelling of vehicles should take place on site, and the storage of fuel, oil and other potentially hazardous chemicals should be minimised.
- Mains power should be used to the greatest possible degree, with no use of generators other than in an emergency.
- Artificial light levels outside the site should be no brighter than existing conditions.
- The height and scale of all cranes to be used on site should be kept to a minimum consistent with public safety.
- All concrete used on site should be delivered as pre-mixed concrete, with no use of on-site concrete batching.

Part B: Content Issues at Greenwich Pumping Station

9.2.18 The main issue at Greenwich Pumping Station of concern to the Council is the handling, management and transport of excavation spoil, which requires a detailed section of its own within Part B of the CoCP in order to improve the level of protection afforded to Deptford Creek (half of which is in LB Lewisham) and the occupiers of land on the eastern side of the Creek (in LB Lewisham).

9.3 Monitoring and Reporting

9.3.1 The funding of a monitoring officer(s) and implementation of monitoring mechanism is necessary in order to cover equipment costs and officer time for site visits, review and assessment of information.

9.4 Wider Controls on Traffic

9.4.1 GPS tracking and clear labelling for every vehicle and a programme is needed for self enforcement. The applicant / contractor should submit a summary of vehicle tracking each month to the Council in order to show that construction lorries are adhering to prescribed construction routes. Vehicle

tracking should be tied to a fine system. All aspects of vehicle tracking, summaries and fining to be paid for and administered by the applicant.

- 9.4.2 The construction environmental management plan should be for Local Authority approval with issues agreed prior to it being distributed to contractors.
- 9.4.3 CoCP A (para 3.1.2) requires a 'liaison plan' and identifies points of contact. This should be an additional requirement.
- 9.4.4 The transport management plan should be for Local Authority approval.
- 9.4.5 Transport Mitigation Impacts Fund to be utilised by the Borough council to deal with monitoring and review and mitigation of transport impacts.
- 9.4.6 Parking and traffic complaint hotline and performance standards for dealing with complaints and a "penalty system" for breaches of Travel Plan, to result in penalty payments to be paid into a Residents, Schools and Businesses Traffic Impact Fund.

9.5 Contributions

- 9.5.1 The Council and the applicant have met (18 September 2013) to discuss matters that ought to be covered in a section 106 agreement. The Council sent a list of initial matters to the applicant following the meeting (11 October 2013) and awaits the applicant's initial drafting of the section 106.

10.0 Conclusion

- 10.1 The likely impact of the proposed Thames Tideway Tunnel development on the London Borough of Lewisham is negative. This is particularly likely during the construction phase of the project when impacts on air quality, biodiversity, the historic environment, land use, noise, socio-economics and traffic.
- 10.2 At Earl Pumping Station, particularly sensitive receptors are the residential properties surrounding the works site. And Deptford Church Street the particularly sensitive receptors are St Joseph's School, St Paul's Church and the businesses under the arches on Crossfield Street.
- 10.3 Post construction the impact of the project on LB Lewisham has the potential to be positive however this is dependent on the design and landscaping, particularly at Deptford Church Street. The final design of both the permanent above ground structures and the replacement open space and landscaping 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.

- 10.4 The Council's preference is that the costs for implementation of a scheme are agreed between the applicant and the Council and payment is made by the applicant, by way of a s106 obligation, in order for the Council to consult with the local community so as to develop and implement a suitable scheme.

Submission reference LBLew05.1

Annex One – LB Lewisham consultation responses



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date 12/01/11

your reference: S/25/40/thames

Thames Tunnel Consultation
Thames Water Utilities
Freepost SCE9923
PO BOX 522
Swindon
SN2 8LA

Dear Sir/Madam

Re: Thames Tunnel Consultation

Please find attached the response of the London Borough of Lewisham to the consultation by Thames Water on the proposed preferred route of the Thames Tunnel. If you have any questions regarding this matter please contact my assistant Brian Regan, Planning Policy Manager, direct line 020 8314 8774, who will be happy to help you.

Yours sincerely

Malcolm Smith
Executive Director for Regeneration

Thames Water – Proposed Thames Tunnel

Observations from the London Borough of Lewisham

Impacts of Proposed Thames Tunnel in Lewisham

Sites in LB Lewisham that could be directly affected under the three route options are:

	Option 1: River Thames route	Option 2: Rotherhithe route	Option 3: Abbey Mills route
Shaft Sites			
Drive	Convoys Wharf*	Convoys Wharf*	
Intermediate	Convoys Wharf Pepys Park	Convoys Wharf Pepys Park	
Reception	Convoys Wharf Pepys Park	Convoys Wharf Pepys Park	
CSO Sites			
Construction Operation	Foreshore Helsinki Square Grove St./Plough Way Earl Pumping Station*	Foreshore Helsinki Square Grove St./Plough Way Earl Pumping Station*	Foreshore Helsinki Square Grove St./Plough Way Earl Pumping Station*
* Preferred Sites			
Other Impacts in Lewisham			
Main tunnel	✓	✓	
CSO Connection tunnel	✓		✓

Planning Policy Context

The Deptford and New Cross area is located within the Thames Gateway Growth Area where the government expects 160,000 new homes to be provided (see: Thames Gateway Delivery Plan). The London Plan identifies two Opportunity Areas in the borough that are, by definition, considered suitable for intensification and regeneration; these are the Lewisham-Catford-New Cross Opportunity Area (with a minimum homes target of 6,000) and the Deptford Creek/Greenwich Riverside Opportunity Area (with a minimum homes target of 8,000, although this includes part of the London Borough of Greenwich so not all the homes target is expected to be delivered in Lewisham). Convoys Wharf is specifically mentioned in the London Plan in relation to delivery of this Opportunity Area.

It is apparent from this that strategic guidance and policy set out in the Thames Gateway Delivery Plan and London Plan requires and expects Lewisham to provide a considerable amount of new homes over the timescale of the Core Strategy, and that this will be focussed within the northern part of the borough.

In the light of this, opportunities to intensify and regenerate areas of the borough were reviewed as part of the Council's work leading to the development of the Core Strategy growth strategy. This included the preparation of the Deptford and New Cross Masterplan which looked at the development capacity of former industrial land in the north of the borough that was either vacant, under used and/or had low levels of employment and a poor record of investment over the past 10 years or more. This process also identified the potential the development of these sites could offer as catalysts for regeneration of the area through mixed use redevelopment that collectively could transform the physical environment and achieve place-making objectives. The study concluded that their development could deliver a comprehensive range of regeneration outcomes in the borough's most deprived areas focused on the provision of housing, jobs, accessibility improvements (public transport, pedestrian and

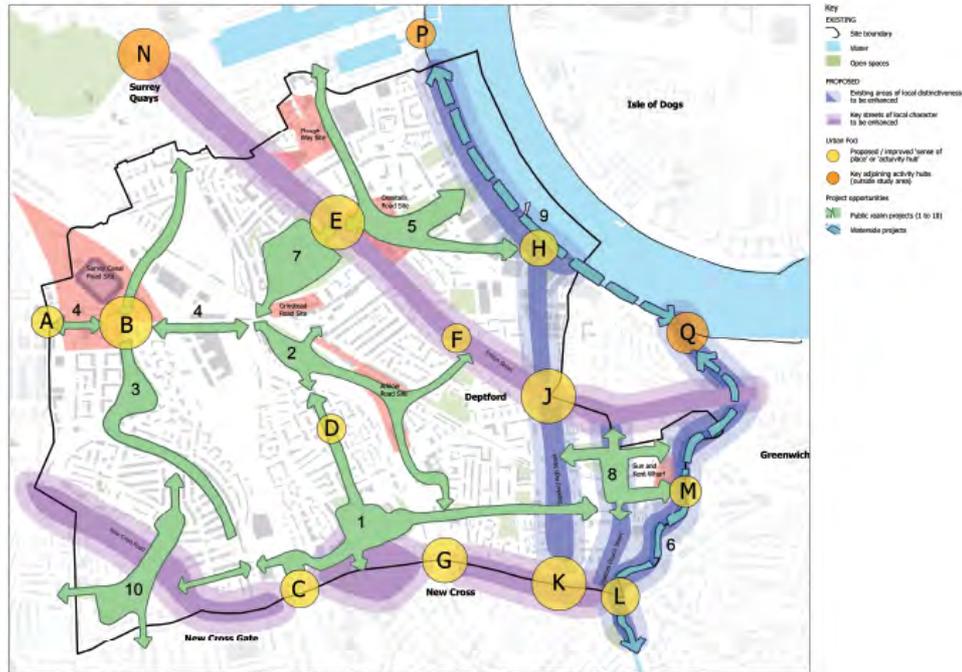
Thames Water – Proposed Thames Tunnel

Observations from the London Borough of Lewisham

cycle), public realm improvements and infrastructure provision (physical, social and green).

4.4 A place of streets, spaces and open spaces (quality, beauty, diversity, variety and choice, green grid)

4.0 Strategic Vision



Source: Deptford & New Cross Masterplan (November 2007)

As a consequence of this assessment, selected sites were identified as 'Strategic Sites' which means they are considered central to the achievement of the Core Strategy. In recognition of their role, and to enable progress as quickly as possible, the development of these sites is promoted directly through policies, explanatory text and illustrative diagrams in the Core Strategy rather than the Site Allocations DPD or an Area Action Plan.

Of particular relevance in terms of sites directly affected by the Thames Tunnel proposals are the Strategic Sites at Convoys Wharf and Plough Way both of which incorporate or are immediately adjoining main tunnel routes (Options 1 and 2) or CSO sites/CSO connection routes. In the case of Convoys Wharf this is also in close proximity to the proposed Borthwick Wharf Foreshore CSO site.

Thames Tunnel Consultation and Background Documents

The assessments undertaken by Thames Water in its consideration of potential sites for shafts and CSOs are based on the policies and proposals in the Council's Unitary Development Plan. This is in the process of being replaced by the Local Development Framework of which a key document is the Core Strategy. This document is at an advanced stage of preparation and will be the subject of an Examination Hearing in February 2011.

The Thames Water assessment is therefore out-of-date and fails to acknowledge both the overall development and regeneration strategy for the area and the importance of the Convoys Wharf and Plough Way Strategic Sites in its delivery. As well as potentially leading to the permanent exclusion of land currently identified in the Core Strategy for development, in the case of Convoys Wharf the site is the subject of a valid planning application and at Plough Way there are valid planning applications on sites immediately to the east and south. The use of the identified sites as part of the

Thames Water – Proposed Thames Tunnel

Observations from the London Borough of Lewisham

Thames Tunnel project would as a minimum delay implementation of the Core Strategy and, given the land take and likely environmental impacts, would prejudice the implementation of the overall development strategy for the area.

Figure 8.1 Site boundaries for Convoys Wharf strategic site allocation

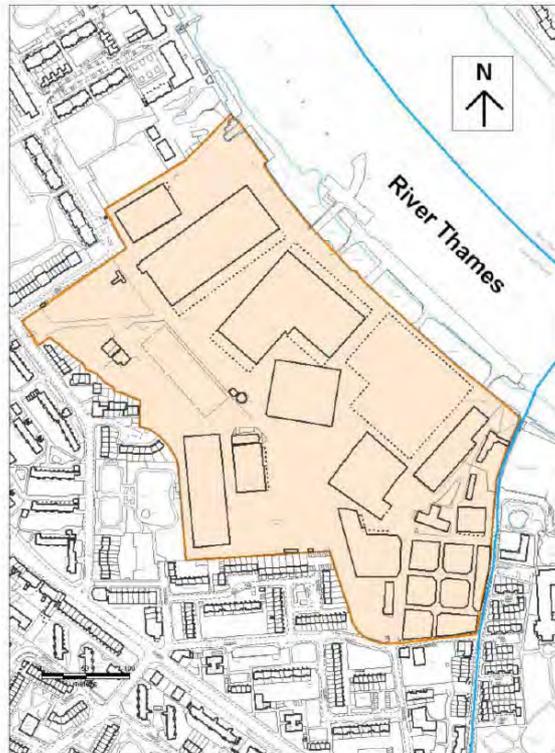
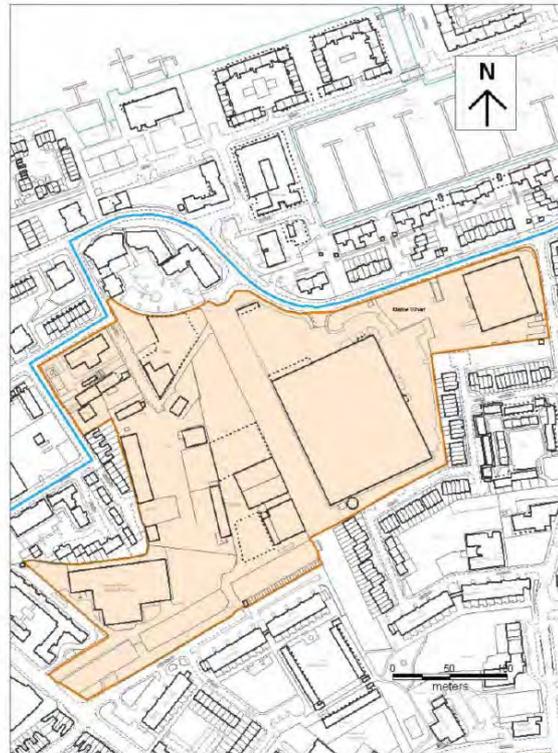


Figure 8.4 Site boundary for Plough Way strategic site allocation



Source: LB Lewisham Core Strategy: Submission Version (October 2010)

Whilst the Thames and Rotherhithe routes are not currently the preferred options, at this stage Thames Water has not ruled them out. This is reinforced by Thames Water's consultation response on the current application for Convoys Wharf which states that "Thames Water would therefore request that the potential need to use this site be taken into consideration, and reserves the right to comment further following the conclusion of our consultation on the preferred sites and routes of the Thames Tunnel."

Both the Thames and Rotherhithe routes involve the use of Convoys Wharf and (Upper) Pepys Park as shaft sites and in the case of Convoys Wharf as a preferred 'drive' site which would involve a permanent structure being retained on the site. In the case of Convoys Wharf the Thames Tunnel buildings and permanent compound is proposed to be sited close to the river frontage within the safeguarded wharf area. It is shown occupying the majority of the river frontage within the proposed safeguarded wharf area and adjacent to the proposed wharf pier/jetty. This would have a significant impact on operations and is likely to effectively prevent the site from being a viable wharf facility. As a consequence until such time as a decision is made to adopt the Abbey Mills Route the Council **objects** to the Thames and Rotherhithe routes and to the use of Convoys Wharf as a drive site.

Thames Water – Proposed Thames Tunnel

Observations from the London Borough of Lewisham

Thames Tunnel Consultation Questionnaire Part 1: Need Solution and Tunnel Route

TW Question 1

There is a need to significantly reduce the amount of untreated sewage entering the River Thames in London. Please give your views about this.

LB Lewisham Response:

The Council agrees that there should be a significant reduction in the amount of untreated sewage entering the London section of the River Thames.

TW Question 2

Taking into account all the possible solutions please tell us whether you agree that a tunnel is the right way to meet the need, and why.

LB Lewisham Response

Based on the studies of other solutions undertaken by Thames Water (which indicate that these cannot consistently guarantee the necessary levels of reduction in sewage entering the Thames without huge expense) the tunnel appears to be the most expedient manner in which to achieve the EU requirements.

TW Question 3

If you prefer another way of meeting the need, please tell us which one and why.

LB Lewisham Response

In the light of the response to TW Question 3 the Council is not proposing an alternative way of meeting the need to significantly reduce the amount of untreated sewage entering the River Thames in London.

TW Question 4

Please select which route you prefer for the tunnel

LB Lewisham Response

Abbey Mills

TW Question 5

Please explain why you have chosen your answer to question 4.

LB Lewisham Response

Abbey Mills is identified in the TW reports as the most cost effective route. It is also the shortest route and so will present the least amount of disruption to river users, businesses and residents than the other routes. Although the route captures slightly less sewage than the other two options the overall water quality would still meet the project objectives set by the Environment Agency.

TW Question 6

Please give us any other comments you have about the project.

LB Lewisham Response

The availability of information regarding the site selection assessments for both the shaft and CSO sites has been difficult and requests for further information have been either unsuccessful or met only in part. The individual site assessments were not available as part of the consultation exercise and only supplied following a formal request from the Council following a meeting with Thames Water. Given the timescale for the consultation and the amount and complexity of information that needs to be

Thames Water – Proposed Thames Tunnel

Observations from the London Borough of Lewisham

reviewed before an informed response can be given the lack of a readily available evidence base is considered to seriously hamper consultees. For example the Site Selection Methodology Paper states that for the long list of shaft sites (which includes Convoys Wharf) criteria and assessment tables were completed for each site, however this did not form part of the publicly available consultation documents.

There is an error in Table 1.1 of the Site Selection Background Technical Paper which states that C31 Earl PS is in LB Southwark; it is in fact in LB Lewisham.

It is discussed in the introduction of the Site Selection Background Paper that the Environment Agency assessed the operation of the 57 CSOs in London that outfall into the River Thames and that 36 were found to cause significant adverse impacts on the environment and that it is 34 of these that the Thames Tunnel will manage. There is however, no discussion on how the remaining 21 CSOs will be managed if in the future they begin to contaminate the Thames River at unacceptable levels.

Thames Tunnel Consultation Questionnaire Part 2: Site Specific Questions

LB Lewisham Response

The series of questions regarding specific sites mixes requests for general views on a site (e.g. TW Question 1) with questions that pre-suppose the identified site is appropriate (e.g. TW Question 2 and 5). The Council's response below needs to be read in conjunction with the **Planning Policy Context** set out above and is without prejudice to the Council's **objection** to the identified sites ('preferred' and 'other') for use as a main tunnel shaft site and as CSO/CSO connection tunnel site.

Shortlisted CSO Sites Abbey Mills Route

Thames Water Preferred CSO Site

Earl Pumping Station

The Council **objects** to the use of land adjoining the Earl Pumping Station on Yeoman Street as a CSO site. The land forms part of the Plough Way Strategic Site in the LB Lewisham Core Strategy and its development as a permanent CSO site could prejudice the implementation the Core Strategy. Thames Water in their formal response (March 2010) to the Core Strategy state that the Earl Pumping station is an important element of London's sewage network and is not redundant nor is it likely to become so. The Council in its proposed changes to the Core Strategy specifically acknowledges the operational need for and implications of the pumping station for the Plough Way Strategic Site. [At that time Thames Water did not indicate the need (potential or otherwise) for additional land for operational (i.e. CSO) purposes adjacent to Earl Pumping Station.]

The information provided in the Site Suitability Report for Earl Pumping Station is based on an assessment of the existing pumping station site only, whereas the proposed preferred site is larger than that assessed and it is unclear whether a second assessment of this larger site has been undertaken using the same criteria. In terms of the larger site, the land take during construction would be approximately twice as large as the existing Thames Water pumping station and associated land; and the permanently retained structures would be sited on land outside the existing Thames Water operational pumping station site.

In terms of the site's suitability, Thames Water have provided a plan showing existing services on and around the site. The Site Suitability report states that, from an

Thames Water – Proposed Thames Tunnel

Observations from the London Borough of Lewisham

engineering perspective, “the site is less suitable as a CSO site because it would be significantly constrained by the existing pumping station and screw lifting station, and the resultant working conditions would be very difficult” however it is not ruled out and is considered ‘suitable’ in terms of planning, property and environmental issues subject to further investigation of flood risk, air quality, noise and land quality issues. In the circumstances, and notwithstanding the Council’s objection to the use of land adjoining the Earl Pumping Station as a shaft site and for the siting of permanent CSO above ground buildings, whilst potentially ‘severe’ restrictions arising from the existing infrastructure on the site have been identified by Thames Water their own assessment would appear to conclude that these do not pose insurmountable problems to permanent structures being sited on existing Thames Water operational land.

The description of the Earl Pumping Station in the consultation pamphlet is erroneous in that it emphasises the industrial aspects of the site and down plays the number of residential properties immediately adjoining and in the vicinity of the site. Therefore whilst it is correct to state that the land directly to the east and south east of Earl Pumping Station is currently in light industrial use/storage use, the site of the proposed permanent CSO buildings would be immediately adjoining existing residential properties. In addition, given the development strategy for the Plough Way Strategic site and current planning applications for the Cannon Wharf and Marine Wharf West sites there would be a significant increase in the number of residential properties adjacent or in close proximity to the CSO.

It is unclear from the Site Suitability Report whether possible health and wellbeing issues that the residents immediately adjacent to the proposed shaft may experience during the drilling and construction phases, or any long term impacts that they or their properties may experience by being in close proximity to a ventilation column approximately 10m high. The Site Suitability report for the Car Park, Helsinki Square, which is similarly close to housing, indicates that the separation distances are unlikely to be considered sufficient to safeguard against impacts on residential amenity and significant mitigation of noise, dust, vibration and traffic movements would be required in order to comply with policies. Similar conclusions could well be drawn from a re-evaluation of the Earl Pumping Station site.

Further to the issue of the proposed CSO shaft at Earl Pumping Station is the connection tunnel that will need to be drilled to join the other proposed CSO sites. The connection tunnel will pass under parts of Deptford between the proposed Borthwick Foreshore CSO (in LB Greenwich) and the proposed Earl Pumping Station CSO. The only information formally provided regarding connection tunnels is that they are expected to range from 2.2m to 2.5m in diameter “at varying depths”. It is therefore unclear from the documents as to the depth of the tunnel in this location. Given that the area has existing and proposed high rise buildings (including, potentially, buildings up to 42 storeys on Convoys Wharf) there needs to be assurances that drilling and vibration will not adversely effect residential amenity and the structural integrity of the buildings, nor prejudice the development of buildings proposed on the Strategic Sites.

Other possible CSO Shaft Sites Abbey Mills Route

Foreshore adjacent to boat yard and Helsinki Square (TW ref. 1) – on the basis that a CSO site is required to deal with current overflow on the foreshore then the Council considers this site is **preferable** to the Earl Pumping Station site as although it is close to residential properties it is likely that the severity of loss of amenity will be less than that on the Earl Pumping station site or other short-listed sites. It is noted that in Thames Water’s Site Suitability report the site is “considered suitable for use as either a small or large CSO site option at an acceptable acquisition cost, given that in both

Thames Water – Proposed Thames Tunnel

Observations from the London Borough of Lewisham

cases, the site is wholly within the foreshore.” While there are issues to overcome according to the Report these are not considered insurmountable. There is also the benefit that the connecting tunnel between the Borthwick CSO and Earl CSO would not need to be bored under residential properties and could follow the route of the Thames.

Car Park Helsinki Square (TW ref. 2) – the Council **objects** to the use of this site as it is considered to be too close to the residential buildings on the western and southern sides of the site.

Boat yard on Calypso Way (TW ref. 3) – this site is in LB Southwark.

Car park corner of Grove St and Plough Way (TW ref. 4) – the Council **objects** to the use of this site as it forms part of the Plough Way Strategic site and its use as a CSO site would prejudice the implementation of development as set out in the Council’s Core Strategy. The site currently has a two storey office block on the eastern side of the site and residential properties to the north and south. Given the proximity of existing and proposed residential development surrounding the site and the loss of facilities for the existing office building this site is not considered appropriate.

Shortlisted Sites in relation to alternative routes

Convoys Wharf

The Council **objects** to its proposed use as a Drive, Intermediate or Reception site. Convoys Wharf is identified as a Strategic Site in the Council’s Core Strategy and is the subject of a current application for its redevelopment for mixed use purposes including up to 3,500 new homes, Primary School, hotel and business space as well as the retention of a safeguarded wharf. Its use as a shaft site would, as a minimum, delay the implementation of the Council’s Core Strategy during construction of the tunnel and as a Drive site the retained structures could prejudice the development potential and capacity of the site. The proposed siting of the shaft towards the north western boundary of the site would be in the location of the proposed area of retained safeguarded wharf under the current planning application and would prejudice the viability of the wharf contrary to London Plan policies. There is also the issue of the Grade II Listed Building, and the Scheduled Ancient Monument on the site; and the area being recognised as a Nationally Significant Archaeological Site.

(Upper) Pepys Park

The Council **objects** to its proposed use as an Intermediate or Reception site. Upper Pepys Park has recently undergone extensive re-landscaping as part of the Council’s improvements to open space on the Pepys estate and its use as a shaft site would involve the loss of public open space in an area where there is a significant resident population.



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brian.regan@lewisham.gov.uk

date 29/07/11
our reference S/25/40/thamestunnel
your reference

Dear Ms Gibbons

Re: Thames Tunnel – Deptford Church Street Site

Following the close of formal consultation on Phase 1 of the Thames Tunnel in January this year, Council Officers were made aware of a newly proposed CSO interception site known as Deptford Church Street.

The Council objects to the use of this site and considers that there are a number of serious concerns with Thames Water's inclusion of this site, as detailed below.

- The site is adjacent to St Pauls Church Deptford which is a Grade I Listed Building and the works would materially harm the setting of the building;
- There is a historic wall on the site that has been identified by the Council Conservation Officer as being part of the rectory once attached to St Pauls and this will be destroyed or materially damaged as a result of the proposed works;
- The works will be taking place in a Conservation Area;
- Trees will be removed;
- The Crossfield Amenity Green will be made unavailable and inaccessible for an extended period during construction. It is in an area with limited public open space;
- There are two Primary Schools close by St Joseph's Catholic School is opposite the site and the new Tidemill School (due to be completed this year) is close by, and students attending Addey and Stanhope who live in the area may also have their route to and from school affected;
- The effects of noise, vibration and dust on the schools, nearby residents and people worshipping;
- The dust released, given the multiple uses on the site over the centuries, could be contaminated;
- The health of children attending St Josephs Catholic could be adversely effected by dust from construction;
- Given that the proposed works are projected to take 2-3 years – possibly longer, this will impact on a large portion of the children's primary education and the constant noise, dust, and vibration could effect their learning potential;

- There will be a substantial number of vehicle movements resulting from the proposal most of these will involve Heavy Goods Vehicles (HGVs);
- There may be a requirement to reconfigure the road system as Deptford Church St is a dual carriage way with no break until Creek Road where U turning HGVs would pose a serious safety hazard to other motorists;
- HGVs will also pose a safety risk to children accessing St Josephs Catholic and the new Tidemill School;
- There is likely to be long term disruption to Crossfield and Coffey Streets and a portion of Deptford Church St;
- Road surfaces are likely to be damaged as a result of the high levels of use by HGVs;
- Loss of parking during the construction phase and after.

For these reasons, the Council does not consider Deptford Church Street an appropriate site and encourages Thames Water to consider alternative sites.

Please do not hesitate to contact me if you have any queries.

Yours sincerely



Brian Regan
Planning Policy Manager



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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



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date 05/10/2012
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

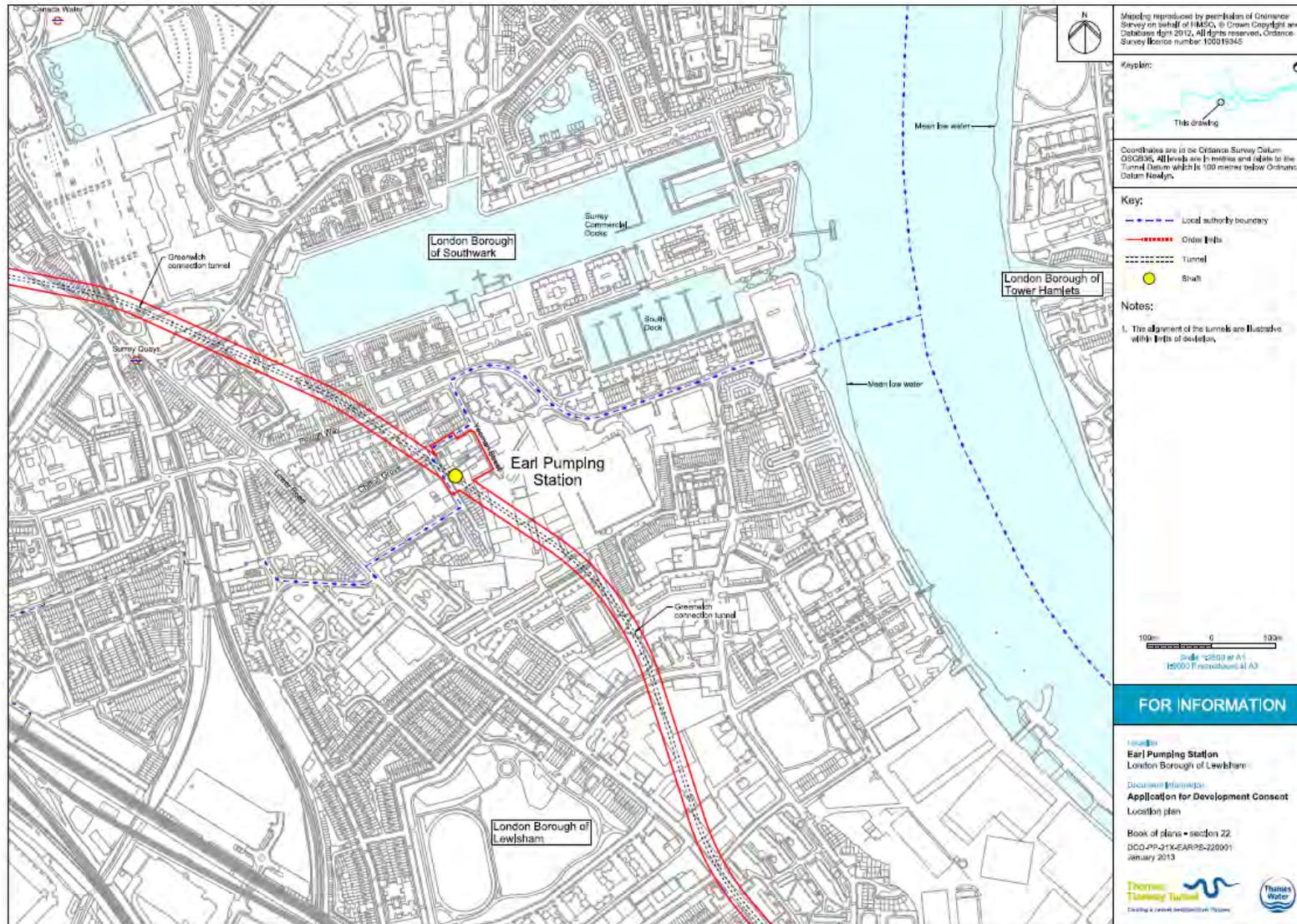
- 2.1 This is a very large engineering project that will have considerable socio economic consequences including the impact on social and community infrastructure, local businesses and the local economy, as well as effects on local amenity. The two proposed sites in Deptford are located in Evelyn Ward 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.

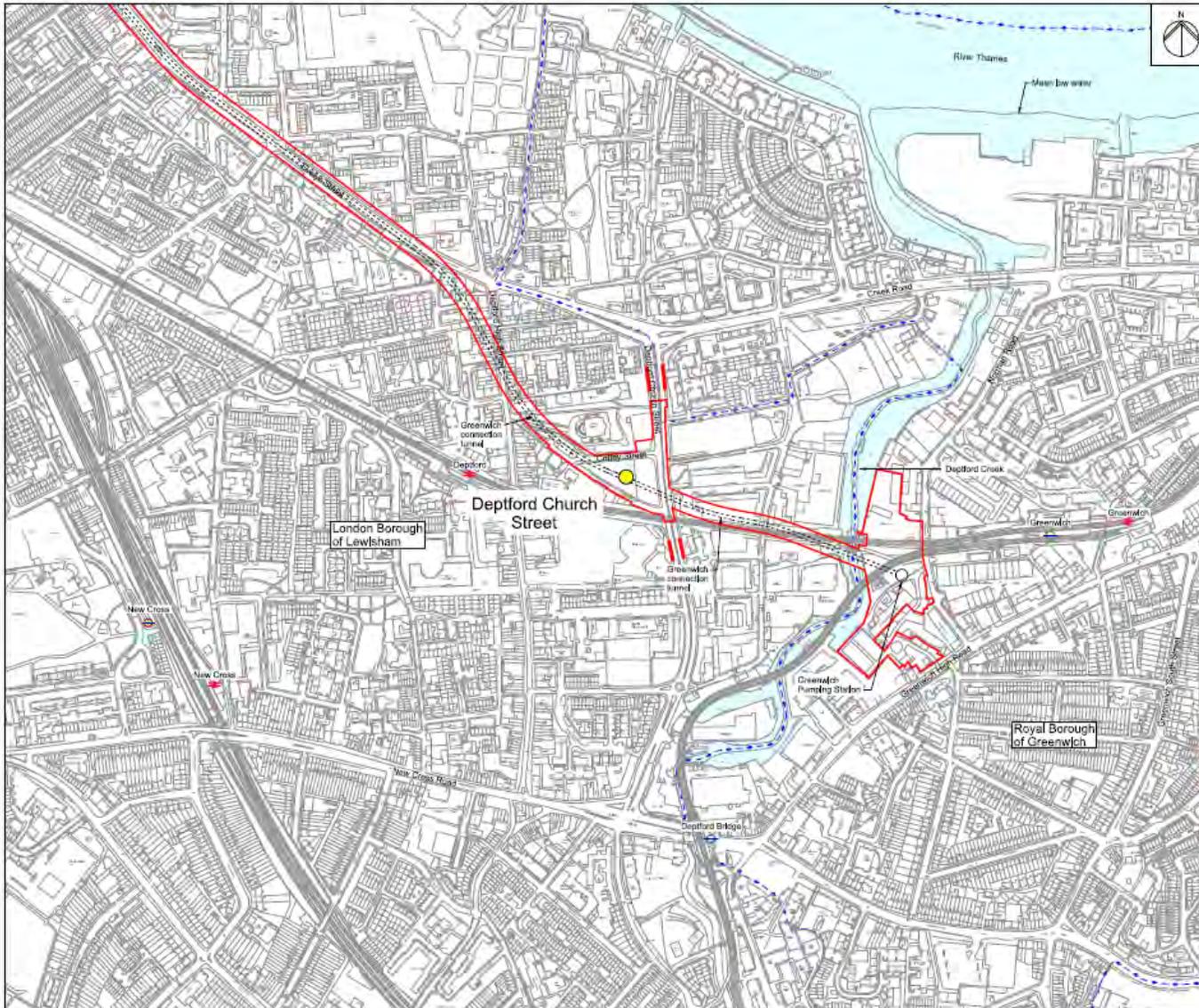
3. Conclusion

- 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.

Annex Two – Context maps

Submission reference LBLew05.2





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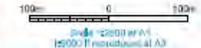


Coordinates are to be Ordnance Survey Datum OSGB36. All levels are in metres and refer to the Tinned Datum which is 100 metres below Ordnance Datum Newlyn.

- Key:
- Local authority boundary
 - Order limits
 - Tunnel
 - Shaft

Notes:

1. The alignment of the tunnels are illustrative with limits of order.



FOR INFORMATION

Location:
Deptford Church Street
London Borough of Lewisham

Document Information:
Application for Development Consent
Location plan

Book of plans - section 23
DCO-PP-22X-2EPCS-230001
January 2013



Annex Three – Earl Pumping Station photos

Photo 1 below shows the existing mature tree on Croft Street that would be lost if a vehicular access was created in this location



Photo 2 shows other mature trees on Croft Street that need protection during construction works.

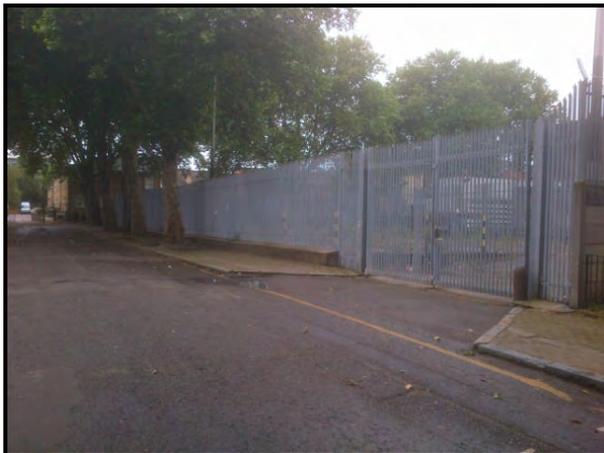


Photo 3 shows the marker stone that exists in the crossover for the access partly shown in Photo 1

