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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

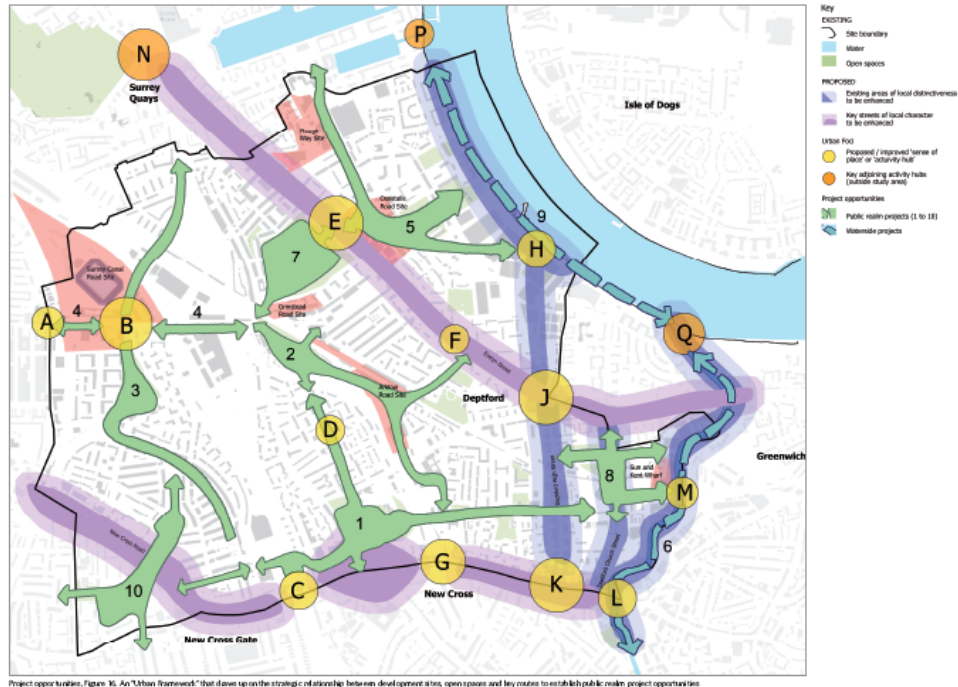
Thames Water – Proposed Thames Tunnel

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

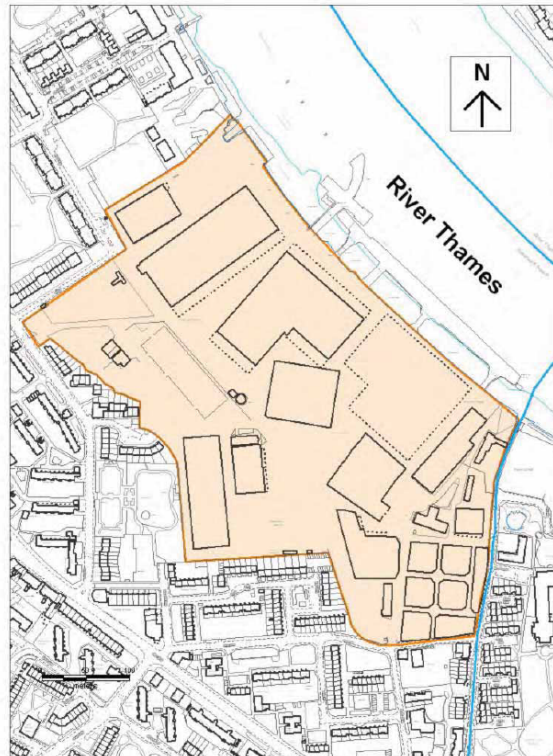
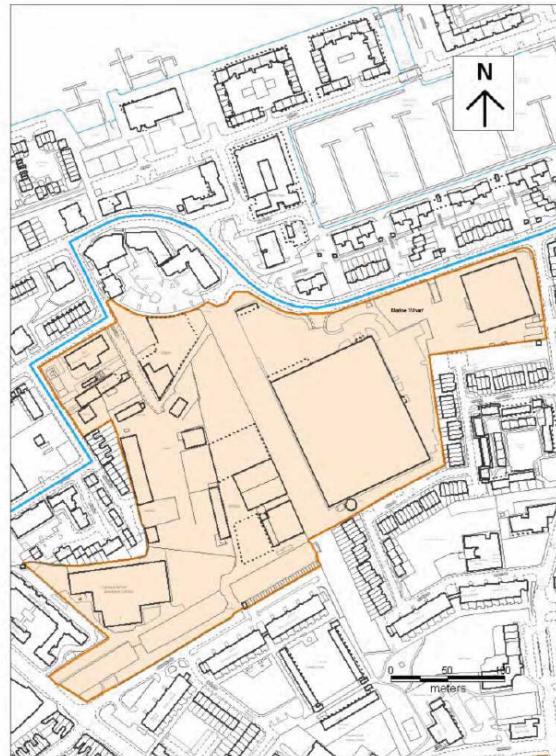


Figure 8.4 Site boundary for Plough Way strategic site allocation



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.