

Item No. 12.	Classification: Open	Date: 24 January 2012	Meeting Name: Cabinet
Report title:		Thames Tunnel – Response to Phase Two Public Consultation	
Ward(s) or groups affected:		Cathedrals Ward, Riverside Ward, Rotherhithe Ward, Surrey Docks Ward	
Cabinet Member:		Councillor Fiona Colley, Regeneration and Corporate Strategy	

FOREWORD – COUNCILLOR FIONA COLLEY, CABINET MEMBER FOR REGENERATION AND CORPORATE STRATEGY

This report sets out the proposed response from the council to Thames Water’s latest consultation on the preferred route and site for the Thames Tideway Tunnel – aka the Super Sewer.

Whilst recognising the importance of reducing the amount of sewage that reaches the Thames, Southwark Council has significant concerns over the current proposals from Thames Water. We support the recommendations of the Selborne Commission that the full-length tunnel proposal should be reconsidered.

We strongly object to the use of Chambers Wharf as a shaft construction site and have strong concerns about the works proposed at the Shad Thames Pumping Station and Earl Pumping Station. We also continue to oppose the use of King Stairs Gardens and the Druid Street playground which remain as possible alternative sites in Thames Water's plans.

RECOMMENDATIONS

1. That cabinet agrees the response to the consultation by Thames Water on the proposed preferred route and sites for the Thames Tideway Tunnel (Appendix A).
2. That the cabinet notes that the Leader will make any final amendments to and sign the council’s response to Thames Water (Appendix A).

BACKGROUND INFORMATION

3. Thames Water is consulting on its second stage of public consultation in relation to the proposed Thames Tideway Tunnel preferred route and selection of sites. This report sets out the relevant background to the proposals and relevant considerations for members in agreeing the council’s consultation response.
4. The Thames Tideway Tunnel is a proposal by Thames Water to construct a large sewerage tunnel along the route of the River Thames to help clean up the river. Thames Water states that in an average year, 39 million cubic metres of untreated sewage overflows into the Thames through London’s combined sewer overflows (CSOs). Thames Water needs to address this issue to comply with the EU Urban Waste Water Directive.

5. Thames Water previously consulted on the first stage of public consultation in September 2010, this consultation set out the preferred tunnel route and sites. The preferred tunnel route at the time included a main reception site at King's Stairs Gardens and a smaller Combined Sewer Overflow (CSO) site at Alfred Salter Playground on the St John's Estate. Southwark council responded to the consultation objecting to the use of these two sites.
6. Following a review of the tunnelling strategy, Thames Water is now re-consulting on their preferred route and providing further details about proposals for individual sites. The preferred route remains the "Abbey Mills" route (see Appendix B), which is largely the same route as the one identified in the Phase One public consultation.
7. However, following a reassessment of available sites, Chambers Wharf has been identified as the preferred site for a main tunnel shaft. King's Stairs Gardens remains a possible site, but is not preferred. It is envisaged that Thames Water will drive towards Chambers Wharf from Battersea and drive from Chambers Wharf to Abbey Mills. Material which is extracted from the tunnel between Chambers Wharf and Abbey Mills will be extracted from the Chambers Wharf shaft. This is change to the tunnelling strategy. At the first stage of consultation it was envisaged that tunnels would be driven from east and west towards King Stairs Gardens. However, Thames Water report that due to difficulties associated with moving the excavated material off-site by river at Abbey Mills, it has been concluded that it is preferable to use this site to receive the main tunnel, rather than as a drive site.
8. With regard to combined sewer overflows Alfred Salter Playground is still a shortlisted site for a shaft to intercept the Shad Thames CSO. However, Thames Water's preferred solution for addressing this CSO is to install pumps in the pumping station on Maguire Street which can hold sewage in the system during a storm and release it back to existing tunnels in the aftermath.
9. It is also proposed to drive towards Chambers Wharf from Greenwich pumping station to intercept CSOs in Deptford, Greenwich and the Earl Pumping station off Plough Way (in LB Lewisham).
10. Thames Water will take into account comments made during this round of consultation in preparing the Development Consent Order (DSO) application. Consultation on the DSO is due to take place in mid 2012 and it will be submitted to the Major Infrastructure Planning Unit (MIPU) in late 2012. Southwark will be invited to provide formal observations on the application. Public hearings will be held during 2013 and final approval of the scheme will rest with the Secretary of State whose decision will be made predominantly in accordance with the National Policy Statement on Waste Water designated under *section 5(2)*, of the 2008 Act (NPS). The NPS is currently in draft form and subject to ongoing consultation but notably includes reference to the need for the Thames Tideway Tunnel. If approved, construction of the tunnel would start in 2016 and the project is due to be completed by 2022/23.

Consultation

11. Thames Water is currently undertaking their phase two public consultation from 4 November 2011 until 10 February 2012. At this stage the council is being consulted on the preferred route and the revised selection of sites. This includes further detailed issues around design and mitigation measures then were considered previously.
12. Southwark was consulted by Thames Water in 2008 on its site selection methodology and again in December 2009 on possible shaft construction sites in Southwark. In its response, Southwark eliminated a number of sites, including the forecourt to Tate Modern and Potters Field Park and coach park as being unacceptable. Southwark devised criteria and ranked Thames Water's remaining short and long listed sites in order of preference. King's Stairs Gardens was the least preferred option.
13. In September 2010, Thames Water commenced their first stage of public consultation on the preferred tunnel route and sites. The preferred tunnel route included a main reception site at King's Stairs Gardens and a smaller CSO site at Alfred Salter Playground on the St John's Estate. Southwark Council responded to the consultation objecting to the use of these two sites.

KEY ISSUES FOR CONSIDERATION

Principle of the tunnel

14. On 4 July 2011, five London boroughs (Hammersmith and Fulham, Kensington and Chelsea, Richmond, Southwark and Tower Hamlets) came together to sponsor an independent commission to carry out a review of the proposed Thames Tunnel.
15. This commission was informed by the Environment, Food and Rural Affairs (EFRA) Committee's response to Defra's draft National Policy Statement on Waste Water, which highlighted the lack of information available to the committee on alternative options to the Thames Tunnel. The concerns of the EFRA Committee, and those who submitted evidence to the committee's inquiry into the NPS, made clear the need for an independent review of the various options for dealing with London's waste water, within the wider context of water management across the capital.
16. The aim and purpose of the Thames Tunnel Commission was fourfold:
 - Review the findings of previous studies relating to the Thames Tunnel and reassess the assumptions made in those studies in the light of subsequent research and more up-to-date scientific knowledge;
 - Examine the recent responses of other world cities to the problems of pollution, flooding and potential water shortages;
 - Consider evidence from stakeholders, experts in the field and other interested parties;
 - Reassess the options for addressing EU Directive 91/271/EC in the light of developing international perspectives on waste water management and in the light of the recent EU White Paper on Adaptation and Surface Water Management.

17. The report of the commission published in October 2011 strongly recommended that the Ministerial request to Thames Water to pursue a full-length tunnel should be reconsidered. This would enable the full range of 'best technical knowledge' options available to manage storm water to be evaluated and given equal consideration to the tunnel option.
18. The commission also encouraged Defra to recommend to the EU that there is a need for an environmental and economic reassessment to ensure not only that storm water overflow issues are addressed but also that flooding and wider societal benefits are considered and that the options pursued do not entail excessive cost for the benefits accrued in today's economic climate.
19. It was found by the commission that that the alternative options to a full length tunnel have never been adequately tested, especially where such alternatives can deliver more than the mono-benefit of combined sewer overflow spill reduction that the tunnel will provide. These options include reducing flows by separation, by green infrastructure, by the construction of local detached sewage treatment works, by the construction of distributed storage and by the enhancement of the existing sewerage network, thereby allowing a partial tunnel solution at a lower cost or even a non-tunnel solution.
20. On the basis of the findings of the commission, Southwark should dispute the need for the tunnel until there has been an environmental and economic reassessment of the proposal. Furthermore, in the light of the findings, Southwark should dispute the full-length storage tunnel option as the best possible means of meeting the requirements of the Urban Waste Water Treatment Directive considering that other technical options may be as viable and more cost-effective.
21. As per the findings of the commission, Southwark should raise serious concerns about the escalating costs of the Thames Tunnel and the impact this will have on customers, pushing a significant proportion of Thames Water bill payers into water poverty.
22. It should be noted that the National Policy Statement (NPS) on Waste Water should not pre-empt the role of the planning process to determine whether the Thames Tunnel meets the criteria for major waste water developments.

Chambers Wharf

23. The location of the site is shown in Appendix C. Chambers Wharf is a cleared re-development site that has planning permission for residential development; part of the site is also located within the foreshore of the River Thames. Loftie Street is to the east of the site with Chambers Street to the south, beyond which is a development site where residential properties are proposed. Luna House and Axis Court apartment blocks are to the west with St. Michael's Roman Catholic Secondary School to the south west and Riverside Primary School to the south east. The site is adjacent to the St Saviour's Dock Conservation Area.
24. Thames Water is proposing that Chambers Wharf is used as a main tunnel drive site as an alternative to King's Stairs Gardens. Construction on site is likely to take approximately 6 years. Activities required to construct the main tunnel would include excavating a shaft approximately 57m deep with an internal diameter of approximately 25m. Once completed a tunnel boring machine would be lowered into the shaft and would drive the main tunnel to Abbey Mills Pumping Station.

Excavated material from the tunnel drive would be removed from the shaft and taken off site. The same shaft would also receive the tunnel boring machines from both Kirtling Street (Battersea) and Greenwich Pumping Station which would be dismantled and removed from the site.

25. Typical working hours are expected to be 8am-6pm weekdays, 8am-1pm Saturday as standard, 6pm-10pm weekdays, 1pm-5pm Saturdays as an extended standard and 24 hours a day, seven days a week for activities taking place below ground or within an enclosure.
26. Thames Water propose to use barges to transport the material to fill the cofferdam and excavated material from the tunnel. However, Thames Water consider it is not generally practical and cost effective to transport all materials to and from the site by barge so some materials would still require transportation by road. Each barge used would remove approximately 85 lorries from the road. Using barges at this site would reduce the number of lorry visits to / from this site by approximately 60% (saving 53,000 lorry visits over the construction period of approximately six years). Even so, it is anticipated that the site would require up to 90 lorry movements per day depending on the stage of construction.
27. Construction traffic would access the site from Jamaica Road (A200), travelling along Bevington Street and turning right into the site from an existing entrance on Chambers Street. Traffic would leave the site via the same route. Thames Water may need to suspend or relocate some parking bays on Chambers Street during construction. The Thames Path currently runs around the site and would remain open throughout the construction works. Based on the current design, Thames Water does not anticipate that any footpath or road diversions, junction changes or bus stop relocations would be required.
28. The permanent works left on the site are stated to incorporate functional elements, which are required for the operation of the tunnel. These include:
 - Underground structures with ground level access covers including: a main tunnel shaft with an internal diameter of approximately 25m and a passive filter chamber.
 - Two ventilation columns up to 6m high.
 - Maintenance vehicle access.
 - An electrical and control kiosk.
29. Once the tunnel is operational, Thames Water would need access to the site for inspection and maintenance purposes. Thames Water would need to visit the site approximately once every three to six months to carry out inspections and maintenance of the ventilation equipment. Once every ten years, Thames Water would also need to carry out a major internal inspection of the tunnel and underground structures. This is likely to involve a small team of inspection staff, a small team of support crew and two mobile cranes to lower the team and inspection vehicle into the shaft. This is likely to take several weeks, and would require temporary fencing around the shaft for safety and security while the inspection takes place.
30. Thames Water's case for selecting Chambers Wharf as a preferred site identifies that it is a brownfield site and has good access to the River Thames, which would allow the removal of excavated material and delivery of construction materials to site via barge. The site would not cause disruption to the Thames

Path because it is already diverted around the site, so no diversion works would be required. Other than impacting on the timescale for development Thames Water state that the proposal would not interfere with the future redevelopment plans for this cleared site.

31. Officers recommend that the council objects to the use of Chambers Wharf as a main tunnel drive shaft for the reasons set out in the consultation response (Appendix A) and summarised below.

Noise and vibration

32. Chambers Wharf is in a mixed-use area with residential developments in close proximity and as such a construction site is likely to have a harmful impact on the amenity of surrounding residents. The increased time frame for development at this site resulting from the Thames Tunnel construction would have an unacceptable impact on neighbouring residents in terms of noise, disruption and loss of visual amenity.
33. There are also likely to be adverse implications, both in terms of disturbance and safety issues for the existing primary school located on Bevington Street in close proximity to the site. The council does not accept the method by which the schools are assessed against the ambient noise as indicated by the London noise maps; the criteria should be based on the baseline noise data.
34. Future proposals will need to clearly demonstrate how the works can operate without detriment to the operation, safety of children and learning conditions at the school.
35. The proposal is contrary Policy 3.2 of the Southwark Plan which seeks to ensure that development does not result in a loss of amenity, including disturbance from noise, to present or future occupiers in the surrounding area or on the application site.

Design and visual appearance

36. The proposed works will result in the need for amendments to the permitted scheme for residential development at Chambers Wharf to the north of Chambers Street. The extent to which the proposal can co-exist with the consented residential scheme on Chambers Wharf remains to be demonstrated through detailed design. At present the council has reservations.
37. The hoardings to be maintained during the construction period will affect views upstream and in particular significant views of Tower Bridge to the west from the public footway. Careful consideration should be given to the design and finish of the proposed hoardings and the design of the hoarding to the river's edge.
38. The 'Dolphin' is an historic river structure located immediately to the east of the wharf for the duration of the works. Careful consideration should be given to the proposed use of barges to service the site and the works that will be required to the shoreline of the River. The proposals must ensure that the 'Dolphin' is properly safeguarded and protected during the construction programme.
39. A detailed condition survey should be carried out of all heritage assets and residential properties that could be affected by the tunnelling works. The detailed condition survey should be retained for the duration of the works.

40. The design of the proposed vents is sensitive. These will be very prominent on the river walk and will become significant landmarks in the area. Their design should be developed more along the lines of sculptures than utilitarian vents.

Thames policy area

41. Chambers Wharf is located in the Thames Policy Area (TPA). The purpose of the Thames Policy Area is to recognise the role of the Thames in maintaining London as an exemplary, sustainable world city. Chambers Wharf comprises one of few development opportunities which has a river frontage in Southwark and plays an important part in enabling Southwark to attract investment and meet the housing need of the borough. The site has planning permission and if it were not for the tunnel proposal it would be available for development. If the tunnel proposal goes ahead, the part of the site which fronts the Thames will not become available for development until 2022/23, blighting the regeneration of this part of the borough.
42. In view of this, the proposal is not consistent with Policy 3.29 of the Southwark Plan, Core Strategy policy 12 or London Plan policy 4C.6 which seek to ensure that character of the TPA is protected and enhanced.

Heritage

43. Chambers Wharf is adjacent to St Saviour's Dock conservation area. Use of the site as a construction site would harm the heritage and conservation value of the area contrary to Southwark Plan policy 3.15, 3.18 and Core Strategy policy 12.
44. The use of Chambers Wharf as a construction site is likely to be detrimental impact on the setting of the listed and locally listed buildings / structures close to the site. Riverside School and Bermondsey Wall West are both grade II listed and their settings would be compromised by the proposal.

Archeological priority zone

45. It should be noted that Chambers Wharf is located within an archeological priority zone. Southwark would expect any planning application to be accompanied by an archeological assessment, evaluation of the impact of development and mitigation measures. Failure to demonstrate adequate mitigation of impacts would be contrary to Southwark Plan policy 3.19 and London Plan policy 4B.15.

Open space

46. It should be noted that Chambers Wharf is close to Cherry Gardens which is an open space protected as borough open land. It is an open space of borough importance and has the second highest level of policy protection afforded to greenfield sites. Any development on Chambers Wharf will need to demonstrate that there are no negative impacts on the nearby open space and its quality and value to the community for recreation and leisure purposes.

Nature conservation

47. The River Thames is the borough's largest site of importance for nature conservation and the site itself may have some habitats or species of value for nature conservation. Any development on Chambers Wharf will need to

demonstrate that there are no negative impacts on the ecological value of the River Thames or the site itself.

Transport and movement

48. The council is concerned about the high number of goods vehicles assumed to use the road network and the effect these will have on residential amenity, pedestrian and cyclist safety and road capacity generally, both locally and in relation to the cumulative impact of construction traffic on strategic roads. In order to minimise this, every effort should be made to transport fill, excavated material and construction elements by river. The council would expect this objective to override any commercial considerations.
49. Notwithstanding the above, it is recognised that there will be a requirement for goods vehicle movements. This raises concerns, as identified in the PEIR, on the safety of pedestrians and cyclists and particularly in relation to school children. The relocation of parking should also be assessed in the light of parking occupancy surveys, but it will be necessary to ensure that all current parking needs are accommodated. The council would wish to be assured that secure cycle parking will be provided on site.
50. For travel on the road network, the council considers the A200 for access to the A2 to be more appropriate than the A2208, since the A200 is part of the Strategic Road Network and that these are more appropriate than routes to the north/west, for reasons of road safety and traffic congestion.

Shad Thames pumping station

51. Thames Water has now established that there is no longer a need to connect the Shad Thames pumping station CSO to the main tunnel. Instead it is proposed that storm flows are managed by utilising existing storage in the sewers upstream of the pumping station and implementing works at Shad Thames pumping station to inhibit it from pumping flows from the CSO into the River Thames. After a storm, new pumps would be used to return stored sewage to the local sewerage system. In extreme storm events, the existing pumps in Shad Thames pumping station would be used to discharge storm flows to the River Thames.
52. The works to the Maguire Street pumping station would last approximately one and a half years in total and would be undertaken during typical standard working hours. The majority of works are to be conducted within our existing property boundary. The works consist of:
 - Modifications to the pumps and internal pipe work including excavation within the pumping station.
 - Demolition of the existing three storey facilities building behind the existing pumping station.
 - Construction of new electrical equipment building in place of the facilities building.
 - Provision of new pumps.
 - Modifications to the existing sewers within Maguire Street outside of the pumping station.
 - Construction of a new vehicle access to Maguire Street and alterations to the front of the existing building.

53. Typical working hours are expected to be 8am-6pm weekdays, 8am-1pm Saturday.
54. Thames Water would transport materials to and from the site by road. Construction traffic would access the site from Jamaica Road (A200), Shad Thames and Maguire Street. Traffic leaving the site would turn right from Maguire Street into Gainsford Street, left into Lafore Street and left onto Tooley Street (A200). Beyond this, construction traffic would use the major road network to get to and from its final destination. As yet there is no information on the number of lorry trips that would be necessary to serve the site. Thames Water may need to suspend or relocate some parking bays on Maguire Street during construction. Footpath and road diversions would also be undertaken on the west side of Shad Thames during the pumping station work and across its full width whilst works are undertaken in Maguire Street.

Impact on residential amenity

55. The location of the site is within a mixed-use area with predominantly residential and office uses. There are a number of residential properties in close proximity and, as such, a construction site is likely to have a harmful impact on the amenity of surrounding residents. Construction of the Thames Tunnel would have a negative impact on neighbouring residents from noise, disruption and loss of visual amenity. This is contrary to Southwark Plan policy 3.2 which seeks to protect the amenity of an area and the quality of life for people living, working or visiting the borough.

Design and visual impact

56. This site is located within the St Saviour's Dock Conservation Area. Without prejudice to the council's objection to the proposal, further discussion should take place in connection with the demolition of an existing section of the pumping station building and the acceptability of the design of the three storey extension along with other alterations to the building including the new vehicular access doors on the front elevation.

Heritage

57. Shad Thames Pumping Station is within Tower Bridge conservation area. There are listed and locally listed buildings close to the site, including 29 Shad Thames and Anise warehouse which are both grade II listed. Any proposals for development which impact on heritage assets should seek to enhance or preserve the heritage assets or their setting. Failure to demonstrate adequate mitigation of impacts would be contrary to Southwark Plan policies 3.15 and 3.18 and Core Strategy policy 12 which seek to ensure that the heritage and conservation value of the area is conserved or enhanced.

Archeological priority zone

58. It should be noted that Shad Thames pumping station is located within an archeological priority zone. Southwark would expect any planning application to be accompanied by an archeological assessment, evaluation of the impact of development and mitigation measures. Failure to demonstrate adequate mitigation of impacts would be contrary to Southwark Plan policy 3.19 and London Plan policy 4B.15.

Transport and movement

59. The council is concerned about the high number of goods vehicles assumed to use the road network and the effect these will have on residential amenity, pedestrian and cyclist safety and road capacity generally, both locally and in relation to the cumulative impact of construction traffic on strategic roads.
60. It is recognised that there will be a requirement for goods vehicle movements. This raises concerns, as identified in the PEIR, on the safety of pedestrians and cyclists. The relocation of parking should also be assessed in the light of parking occupancy surveys, but it will be necessary to ensure that all current parking needs are accommodated. The council would wish to be assured that secure cycle parking will be provided on site.

King's Stairs Gardens

61. Whilst the preferred site put forward for by Thames Water is Chambers Wharf, it should be noted that Kings Stairs Gardens remain a possible alternative site and is therefore still included in the phase two public consultation.
62. For all of the reasons set out in the council's previous response, including the loss of open space and as well as negative impacts on local heritage assets and vale for nature conservation, Southwark should still object strongly to the use of King's Stairs Gardens as a proposed shaft site. Use of King's Stairs Gardens would harm many interests of acknowledged importance, including MOL, nature conservation and heritage.

Druid Street

63. Whilst the preferred site put forward is Shad Thames Pumping station, it is noted that the site at Druid Street remains a possible alternative site and is therefore still included in the phase two public consultation.
64. For all of the reasons set out in the council's previous response including the impact on the amenity of surrounding residential properties as well as the temporary loss of an important children's play facility, Southwark continue to object in the strongest terms to the possible use of Druid Street as a CSO construction site. The loss of the playground, albeit over a temporary period, would result in the loss of an important residential amenity in an area with limited access to open spaces. The loss of the play facilities would leave the 79 homes on the St John's Estate without adequate play facilities, contrary to Southwark Plan policy 3.1, London Plan policies 3A.17 and 3D.13.

Earl Pumping Station

65. Although located within the London Borough of Lewisham, Earl Pumping Station adjoins the boundary with Southwark. There is a significant risk of impacts upon the residential properties with Southwark given their location facing the northwest and south west boundaries of the site.
66. The PEIR identifies that there will be significant noise effects arising from construction activities for properties located with Southwark, including those properties on Chilton Grove immediately adjacent to the north west and south west boundaries of the site. Significant vibration impacts are also predicted from

the construction works. No acceptable details are currently provided of how such impacts upon Southwark residents will be successfully mitigated and objection is therefore raised given the adverse impacts that would be likely to result for the adjacent residents.

67. Vehicle routes to and from the south via the A200 are considered to be more appropriate than the A2208, since the A200 is part of the Strategic Road Network, or to the north/west for reasons of road safety and traffic congestion. There are concerns over cyclist and pedestrian safety on Plough Way, and steps should be taken to mitigate any adverse impact. There are also concerns about general traffic congestion there and on the Lower Road gyratory and these will need to be fully assessed.

General matters and mitigation

Air quality

68. Chambers Wharf, Shad Thames Pumping Station and Earl Pumping Station are all located within an air quality management area. Thames Water will be expected to demonstrate that proposals do not result in a reduction in air quality, through an air quality assessment, as set out in Southwark plan policy 3.8.

Noise and odour

69. Construction of shafts and the residual ventilation structures will also have noise and odour impacts. Proposals which do not demonstrate that they can mitigate these impacts satisfactorily would be considered unacceptable by Southwark, in line with Southwark Plan policies 3.1 and 3.2.

Transport

70. With regard to transport, while Thames Water has committed to transporting excavated materials by barge where possible, in the case of a number of sites, such as the Shad Thames Pumping Station, this is not feasible. All proposals will be expected to be accompanied by a transport assessment, which demonstrates that transport and traffic impacts have been addressed.

Flood risk

71. Potential elevation in groundwater levels as a result of shaft and tunnel construction schemes may introduce or increase flood risk from groundwater in the short term, particularly in areas at high risk of flooding. For shaft construction and operation, site specific mitigation measures such as continuous dewatering during construction should be implemented in order to manage the groundwater levels and reduce risk of groundwater flooding. Further assessment of groundwater flood risk (as part of EIA) following additional groundwater monitoring results should be undertaken. In addition, modelling of the interaction between groundwater and surface water should be undertaken to inform the Environmental Statement (ES) on overall flood risk from the proposed schemes.
72. It is recommended that opportunities to reduce existing site runoff must be explored as all three sites (Earl Pumping Station, Chamber Wharf and Shad Thames Pumping Station) are within or near areas vulnerable to surface water flooding. Conclusive assessments of risk of surface water flooding due to runoff from surrounding areas should be undertaken as part of ES.

73. Impact of future climate change to be simulated and effect on surface water flood risk fully understood and made available in the ES.
74. Introduction of flow discharges from construction site dewatering activities into sewers may reduce storm water capacity and lead to a peak in the local system network, which would increase the risk of flooding. Site specific methodologies and risk assessments should be established (for construction and operation phases), and the council should be engaged with on the proposals.
75. At Shad Thames Pumping Station, the proposal to inhibit pumping flows from existing CSO into the River Thames, utilise storage in upstream sewers and pump storm water from the pumping station into River Thames in extreme rainfall events could increase flood risk in the event of pump failure. The residual risk of flooding (and extent) due to pumping failure should be identified and mitigation measures identified and incorporated.

Planning obligations

76. In the event that the Secretary of State deems it appropriate to grant development consent for the Thames Tideway Tunnel, the council should expect adequate planning obligations to mitigate the adverse impacts of the development on a wide range of matters addressed in the report including in respect of the following non-exhaustive impacts on heritage, open space, community facilities, residential and visual amenity, transport and sustainability, employment and local procurement, public realm, other community impacts and costs of S106 administration.
77. At this stage, it is evident the following (non-exhaustive) items would require considerable mitigations though conditions and perhaps S106 obligations:
 - Archaeological investigation and mitigation and,
 - Construction management plan (noise, dirt, hours), including monitoring,
 - Transportation mitigation,
 - Air quality monitoring and mitigation measures,
 - Noise and vibration monitoring and mitigation measures.
 - Sustainability mitigation
78. Further items may be identified as more detailed proposals emerge.

Sustainability appraisal

79. The construction of the tunnel is likely to have significant social, economic and environmental impacts. Thames Water has indicated that planning proposals will be subject to environmental impact assessment (EIA). The PIER states (PIER Main Report, Volume 4, Scoping Opinions and Technical Engagement, page 17) that no response was received from London Borough of Southwark during the consultation on the scoping report. However, Southwark submitted a response to Thames Water on the 21st July 2011. The response raised concerns over a number of issues, including the lack of heritage consideration.
80. Whilst any future applications affecting Southwark sites would be subject to an environmental impact assessment, it should be noted that an EIA tests the environmental impacts of a particular development. In 2005, the Thames Water

Tideway Strategic Study identified a number of strategic options for addressing the environmental problems of CSOs and concluded that the Thames Tideway Tunnel was the preferred option. Whilst this study included a regulatory impact assessment, it does not appear that the identified options were subjected to any sustainability or environmental appraisal before selecting the Thames Tideway Tunnel or the preferred route. This suggests that the strategic economic, social and environmental objectives arising from the Thames Tunnel are not properly integrated.

81. Southwark Council should reiterate the findings of the commission and ask for a further assessment of the wider impacts of the proposal, in social, economic and environmental terms.
82. The government has recently consulted on the draft National Policy Statement for Waste Water which addresses the need for nationally significant infrastructure projects and includes the Thames Tideway Tunnel. Whilst the draft NPS is the subject of a separate consultation response, it is noted that it relies on the 2005 study and states that Thames Tunnel is the preferred infrastructure solution and that the sustainability appraisal will include “an assessment of the specific aspects” of the Thames Tunnel proposal. This suggests that options should have been subject to sustainability appraisal at the time the 2005 study was conducted.
83. Southwark Council should note in their response that the lack of iterative sustainability testing remains an outstanding issue of concern which undermines the environmental case for the Thames Tideway Tunnel.

Community impact statement

84. The tunnel proposal will have significant impacts on the community. In particular these relate to the impact on residential amenity of surrounding properties, impact on local schools and on the local transport network which are outlined above. There may also be impacts associated with loss of amenity due to noise, dust and odour. Thames Water will need to demonstrate that these can be mitigated.

Financial implications

85. This report is recommending that cabinet agrees the response to the consultation by Thames Water on the proposed preferred route and sites for the Thames Tideway Tunnel (Appendix A) and that the Leader makes any final amendments to and signs the council’s response to Thames Water (Appendix A)
86. There are no immediate financial implications from the adoption of the recommendations in this report.
87. However, it must be noted that the potential future impact from the recommendations may be significant but the long term financial implications cannot be quantified at this stage as consultation is still on-going.
88. Any further work required to finalise the formal response in the consultation will be carried out by the relevant Planning Policy team staff resources without a call on additional funding.

89. Any specific financial implications arising from the final Thames Water Tideway Tunnel proposals or project will be included in subsequent reports for consideration and approval.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Strategic Director of Communities, Law & Governance (SY20120113)

90. Members of cabinet are requested to approve the council's response to the second stage Thames Water consultation in respect of its preferred route for the proposed Thames Tideway Tunnel and selection of preferred sites as set out at Appendix A. The main report addresses the salient technical points which members should note in considering the response.
91. Under paragraph 24, Part 3B of the constitution, the cabinet has overall responsibility for agreeing the council's response to consultation papers. Further, under part 3D of the constitution individual portfolio holders have authority to approve the council's response to consultation documents from various bodies and which relate to significant changes affecting their portfolio (paragraph 13 and 14). The consultation response in question relates to proposals for the Thames Tideway Tunnel, a nationally significant infrastructure project which would impact on a number of portfolios of both Councillor Colley, regeneration and corporate strategy and Councillor Hargrove, transport, environment and recycling and Councillor Livingstone, finance, resources and community safety. In so far as the consultation raises cross-cutting issues, the constitution provides for the approval of consultation to be referred to a meeting of the full cabinet. Accordingly members of cabinet are able to approve the response as set out at Appendix A. Furthermore, in accordance with the council's executive arrangements, the Leader has the authority to approve final amendments to and sign the council's response.

Departmental Finance Manager

92. This report recommends that the cabinet agrees the response to the consultation by Thames Water on the proposed preferred route and sites for the Thames Tideway Tunnel and that the Leader makes any final amendments to and signs the council's response to Thames Water.
93. There are no immediate financial implications arising from the report. Officer time to effect the recommendations will be contained within existing budgeted revenue resources.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Plan, 2007	160 Tooley Street London SE1 2QH	Tim Cutts 020 7525 5380
Core strategy, 2010	160 Tooley Street London SE1 2QH	Tim Cutts 020 7525 5380
Response to Thames Water's Phase One public consultation on the proposed Thames Tideway Tunnel	160 Tooley Street London SE1 2QH	Tim Cutts 020 7525 5380
2011 Response to Scoping Report consultation for the proposed Thames Tunnel	160 Tooley Street London SE1 2QH	Tim Cutts 020 7525 5380
2009 Southwark response to Thames Water's long listed construction sites	160 Tooley Street London SE1 2QH	Tim Cutts 020 7525 5380
2008 Southwark Response to Thames Water's site selection methodology	160 Tooley Street London SE1 2QH	Tim Cutts 020 7525 5380

APPENDICES

No.	Title
Appendix A	Response to Thames Water's Phase Two public consultation on the proposed Thames Tideway Tunnel
Appendix B	Thames Tunnel proposed route
Appendix C	Plan of proposed construction site and illustrative diagram of permanent buildings at Chamber's Wharf
Appendix D	Plan of proposed construction site and illustrative diagram of permanent buildings at Shad Thames Pumping Station

AUDIT TRAIL

Cabinet Member	Councillor Fiona Colley, Regeneration and Corporate Strategy	
Lead Officer	Eleanor Kelly, Deputy Chief Executive	
Report Author	Tim Cutts, Acting Head of Planning Policy	
Version	Final	
Dated	13 January 2012	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Communities, Law & Governance	Yes	Yes
Finance Director	Yes	Yes
Cabinet Member	Yes	Yes
Date final report sent to Constitutional Team		13 January 2012