

# Wandsworth Society

Our Reference No 10018310

Jan Bessell  
The Planning Inspectorate  
3/18 Eagle Wing  
Temple Quay House  
2 The Square  
Bristol BS1 6PN

1<sup>st</sup> November 2013

## Thames Tideway Tunnel. Response to additional questions set by EA.

We comment on two areas where we consider inadequate procedures have been carried out.

### Questions 1 -3 Environmental Matters.

It is clear from the many questions needed to be asked of the Applicant by the EA concerning environmental matters (Air quality, emissions, biological environment, socio-economic effects etc) that no detailed/comprehensive Environmental Impact Assessment has been carried out or consulted on with the relevant parties, as required by EU Directive 2001/42/EC. This we contend makes the Thames Tideway Tunnel Application invalid because proper processes have not been followed.

### Question 13 Policy

Q13.1 asks "*Does the policy context for the proposal described in the application documents need to be modified or supplemented to take account of all relevant and up to date policy documentation at the European, UK, English, County, District and local levels*" We contend that it does.

EU Directives and Articles (2011 92/EU, 2001/42/EC, Art 191 TFEU, Art 288 TFEU, and Art 4(3) TEU] make it clear that there must be a full and adequate consultation on all available options prior to granting development permission for any significantly damaging proposals such as the Thames Tideway Tunnel.

There is no question but that the tunnel will have serious and damaging environmental and social impact. There is also no

question that all available options have not had full and adequate assessment.

There has been no comprehensive study, or consultation on, all reasonable alternatives. No independent and comprehensive study of Integrated Water Management schemes, (ie. a range of measures to capture, slow down, and absorb, rainwater, thus reducing run-off, and maximising the re-use of water). Partial studies such as at Putney are considered to be flawed.

The technology for IWM schemes exist. It is also a system that caters for the future as well as the present. It is being widely adopted by the USA, Germany and other forward-thinking European countries. More importantly, the EU with its green infrastructure strategy published in May 2013 is now promoting IWM schemes.

The EU Urban Waste Water Directive states that schemes must use the “best technical knowledge not entailing excessive costs” The costs of the tunnel are excessive and rising and technology has moved on since it was conceived. The Thames Tideway Tunnel proposals do not comply with this Directive.

The Thames Tunnel will take ten years to implement. Water management schemes can begin almost immediately, will bring environmental and social improvements and remove the threat of Infraction proceedings by the EU.

The TTT project has been the only option supported by the government since 2007. It has not wavered in its support in spite of growing evidence that the project is an outdated and inadequate solution to the problem of waste-water management.

We contend that the policy context needs to be modified to allow full discussion on all possible alternatives and that the option to refuse permission for the TTT should be part of the Inquiry’s brief. In any case, approval should not be given until it can be shown that the proper EU procedures have been carried out.

Shirley Passmore  
for Wandsworth Society.