

REPORT for

London Borough of Tower Hamlets

Thames Tunnel – LBTH Information Requirements (S48 stage)

T1908 – Thames Tunnel Review

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Document Version Control

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1. INTRODUCTION

Temple Group has been commissioned by the London Borough of Tower Hamlets (LBTH) to review the information requirements provided to the Council via email by Patrick Duffy on the 22nd December 2011. This review was to be carried out in light of any new information provided by Thames Water relevant to the site selection process employed for deriving the preferred option of intercepting the NE Storm Relief CSO which lies within the Borough.

This forms Task 1 within the latest fee proposal (provided 6th August 2012).

It should be noted that as the application has been developed by TW, so has the Environmental Impact Assessment (EIA) that forms a key component of the application. Many of the data requirements originally requested are now partially satisfied by the latest version of the Preliminary Environmental Information Report (PEIR), which will become the Environmental Statement. It is important to understand that this information that has recently become available (at S48 stage) is largely irrelevant to the preferred site selection decision, for the following reasons:

- The EIA process only covers the KEMP Foreshore Option with this increased detail of environmental information (i.e. not the Heckford Option); and
- The site suitability reports and resultant preferred site selection were based upon a level of environmental data available **at that point in time**, and it is this data (i.e. the data upon which the decision is based) that is important to view when assessing whether the site selection was carried out in a robust manner.

Section 2 of this short report re-iterates (and in some cases adds to slightly) the environmental information requests previously stated, as no new useful environmental information relevant to the final stages of the site selection process have been provided by TW.

LBTH may want to re-request this information of TW as part of the Section 48 publicity consultation. If provided, it could be used within the Reassessment process that LBTH are proposing to undertake (Task 2 of brief). This information would need to be provided in good time if it is to be usefully analysed before any formal consultation response would need to be completed (taking into account LBTH democratic processes).



2. INFORMATION REQUIREMENTS

2.1. Air Quality

Local Air Quality - For the purposes of the local air quality assessment a preliminary qualitative assessment was undertaken in order to facilitate the site selection process. The actual environmental information and parameters used at that time to enable the preferred site selection decision has not been provided. We would like to see the information used **at that point in time** within the site selection process for **both** sites.

Construction Dust - For the purposes of the construction dust assessment a full qualitative assessment of construction was undertaken in accordance with “Best Practice Guidance (BPG), The Control of Dust and Emissions from Construction and Demolition”, published by the GLA and London Councils in November 2006 (BPG, 2006). The actual environmental information and parameters used at that time to enable the preferred site selection decision has not been provided. We would like to see the information used **at that point in time** within the site selection process for **both** sites.

Odour - A full quantitative assessment using dispersion modelling was undertaken for the odour assessment. The actual environmental information and parameters used at that time to enable the preferred site selection decision has not been provided. We would like to see the information used **at that point in time** within the site selection process for **both** sites.

From available site selection information, it seems that these assessments were carried out, but the assessments themselves don't seem to have been published therefore making it difficult to enable a completely informed opinion on the site selection results.

2.2. Noise

During the site selection process (i.e. up to and including Part 1C – creation of preferred list of sites), neither site seemed to be subject to a location specific construction noise and vibration impact assessment. Such an assessment for each site is needed in order to make a robust decision on which are the least worst locations. Such assessments should include:

- Description of the works to be carried out;
- Working methods and duration of the works;
- Details of methods to be used to minimise noise and vibration;
- Location of the noise-sensitive receivers;
- Predicted noise levels (and vibration where required) for the sensitive identified receivers;
- Sufficient information for the LA to validate predictions, i.e.;
 1. Plant: Number and types selected, sound power levels of that plant (and the source of the information, e.g., BS 5228);
 2. Noise source and receiver heights;
 3. Information used in a BS 5228 calculation, i.e., angle of view corrections, percentage on time;
 4. Screening calculations;



5. Facade correction;
 6. Details of activities within the start-up/close-down periods; and
 7. Plan showing the working area, main plant locations and named nearby noise-sensitive receivers.
- For works which occur outside of normal working hours and/or are predicted to result in noise levels in excess of the noise insulation trigger level, additional information is required, including:
 1. The predicted number of households likely to be affected;
 2. The number of days for which the thresholds for noise insulation/temporary re-housing are met or exceeded (see CoCP Section 6.4);
 3. A detailed BPM assessment of possible quieter alternative methods and full justification of why these are not reasonably practicable;
 4. Particular emphasis should be given to the consideration of specific mitigation measures over and above the general measures discussed in CoCP Section 6.4; and
 5. For works proposed to be undertaken outside of normal working hours, full justification for why these works cannot be completed within normal working hours.
 - Assessment of the different effects on noise and vibration due to construction traffic has not been identified.

Note:

Baseline noise levels had been deduced by scrutiny of the DEFRA Strategic Noise map for London. DEFRA specifically warn against this and doing so presents issues as follows:

- The strategic noise maps are in terms of long term annual average noise levels; so differential weekend compared to weekday values between the sites are lost;
- The strategic noise maps are for individual noise sources i.e. road, rail and air so they may underestimate exposure; and
- The strategic noise maps are designed to identify the noisiest sites for priority action, in order to speed up the calculation process less trafficked roads were ascribed a default traffic flow i.e. 1000 vehicles per day. Consequently there is risk that not only has the correct baseline for each site not been identified, any differences between the sites have not been correctly identified either.

In general, the actual environmental information and parameters used at that time to enable the preferred site selection decision has not been provided. We would like to see the information used **at that point in time** within the site selection process for **both** sites.

2.3. Traffic and Transportation

The actual environmental information and parameters used at the time of site selection to enable the preferred site selection decision has not been provided. We would like to see the information used **at that point in time** within the site selection process for **both** sites.



This would apply to the following key information that would be required for a more meaningful comparison of the traffic impacts of the proposed, and which Temple would have expected to have been compiled by Thames Water:

- Traffic data from the surveys identified at the time as done, but not reported – for both sites;
 - Data on traffic accidents at the junctions of The Highway with Glamis Road and Heckford Street;
 - LinSig or OSCADY modelling for the Glamis Road Junction, and PICADY modelling for the Heckford Street junction;
 - An indication of the outcome of any discussions with the Port of London Authority regarding the feasibility of the use of water transport for access to and from the KEMP site;
 - Details of original calculations regarding the total development time, un-bulked volume of export to Barge and/or road and traffic numbers (number of barges/HGVs required);
 - Details of how road traffic (HGV) patterns will be disrupted by availability of barges (due to turnaround times/ tides etc.);
 - Assessment of the effects on road safety, noise and air quality due to construction traffic for both sites;
 - Initial plans for potential temporary traffic management; including any discussions with the street works and traffic manager at TfL and LBTH; any temporary traffic regulatory orders that need to be put in place/lifted (with regards to routing strategy); and any temporary construction works that would need to be put in place to facilitate traffic movement;
 - Details of construction traffic (import) including volume required during construction phase (of tunnels/shafts/wharf, including landscaping) and number of service vehicles and staff vehicles proposed;
 - Data on parking survey and outcomes;
 - Planned highway/utility works during the years of operation, and how this will affect other statutory bodies; and
- Details of the auto track turning movement and sweep path analysis for HGVs travelling between different sites.

2.4. Landscape, Visual and Socio-Economics

The following should be provided so that a fair comparison can be made between the two options:

- A separate assessment of the KEMP element of the Heckford option;
- An assessment of the Heckford option as a whole, including a Site Suitability Report (SSR) which covers the whole option (i.e. including element within KEMP);
- A comparison of the SSR for full Heckford option with the KEMP foreshore option SSR; and



- A comparison of the impact of the two options on KEMP (to include townscape / visual / park users).

Most of the other information required for the townscape/visual/ park users is within the documents but is hard to find and has not been presented in a comparative form.



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