

## Appendix 1

### Thames Tideway Tunnel Consultation Questionnaire

#### Part 1

##### Need Solution and Tunnel Route

#### **1. There is a need to significantly reduce the amount of sewage entering the River Thames in London.**

**Please give your views about this.**

The Council recognises the environmental and public health impact of the discharge of Combined Sewer Overflows into the river Thames. It is concerned that on average 20 million cubic metres of untreated sewage flows into the river each year as a result of the shortcomings of the design of the London sewerage system. Whilst it is understandable that the origins of the system stem from a Victorian solution to meeting the public health needs of London's population at the time, the region must resolve today's challenge and the requirements of the Urban Waste Water Treatment Directive.

The Council has a specific concern that approximately 7% of the non compliant discharge passes into the river from the North East Storm Relief Sewer and Holloway Storm Relief Sewer in the river wall at two points in the south of the Borough.

The Council is grateful for the work carried out by the Thames Tideway Strategic Study which examined the details of the problem, identified potential strategies and solutions and made recommendations set in the context of cost benefit together with environmental and social outcomes.

The Council confirms that large parts of the Borough are classed as 'Areas of Deficiency' in terms of biodiversity as they are lacking accessible wildlife sites within reasonable proximity. For this reason the large number of canals and docks within Tower Hamlets are vital assets when preserving and enhancing biodiversity within the Borough. The Council recognises the relationship between water quality within the River Thames and the levels of biodiversity within these canals and docks, and for this reason also supports Thames Water's objectives in reducing the amount of sewage entering the river in the Borough.

#### **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.**

The Thames Tideway Strategic Study identified four potential solutions

1. Adoption of source control and sustainable urban drainage;
2. Separation of foul and surface drainage and local storage;
3. Screening, storage or treatment at the discharge point to river; and
4. In-river treatment.

It is clear from the 2005 reports that the most appropriate solution sits within the option of storing and treating the sewage as capacity allows. The report indicates that a large diameter storage and transfer tunnel running from Hammersmith and connecting with the Beckton Treatment Works would permit the maximum proportion of combined sewer overflows to be intercepted. Whilst the construction of a 7.2 metre diameter tunnel some 50 metres below the surface of the existing London infrastructure would in itself cause some adverse environmental impact, the long term gain would outweigh much of the negative impact from construction, particularly if the project is well planned and has robust environmental controls in place.

The Council supports the preferred route which minimises the number of tunnel boring drives, maximises construction under or above water courses and recognises the need to maintain precious open space in a diverse, small and densely populated Borough in the East End of London.

The support for the preferred route comes with the expectation that appropriate Environmental Minimum Requirements will be applied to the Project. It is essential that the Project adopts the requirements of the Council's Code of Construction Practice (CoCP). The project CoCP, Construction Environmental Management Plan (CEMP) and various operational Environmental Management Plans will need to be agreed with the Council. Consultation with the Council's Environmental Health Officers (EHO's) will be needed to agree the various method statements, monitoring frameworks, and in developing Conditions addressing issues and requirements specific to Tower Hamlets. It is also essential that the Project has an appropriate Settlement Policy agreed by the Council.

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

Please see 2 above

**4. Please select which route you prefer for the tunnel.**

- **Abbey Mill (preferred route)**
- **River Thames**
- **Rotherhithe**
- **None of the above**

Abbey Mill

**5. Please explain why you have chosen your answer to Q4.**

Tower Hamlets Council supports the choice of the Abbey Mills route as the preferred main route of the tunnel. The selection of the Abbey Mills route is welcomed by the Council as both the River Thames route and Rotherhithe route would in all likelihood require shaft sites at Westferry Road on an area of open space known as Sir John McDougal Gardens. The Council also supports the Abbey Mill route as it reduces the impact on King Edward Memorial Park. The Council would be extremely concerned

by the River Thames or Rotherhithe routes as both could result in King Edward Memorial Park being used as a main tunnelling site.

### *Impact of the River Thames and Rotherhithe Routes*

The Council is extremely concerned about the impacts of the River Thames and Rotherhithe routes on residents of Tower Hamlets. Both routes would in all likelihood require the construction of a main tunnelling, and/or reception and/or intermediate shaft sites along the Tower Hamlets River Thames frontage. For this purpose, Thames Water identified a number of sites through its short-listing process:

#### Limehouse Tunnelling Area

Site 1 – Shadwell Basin, Garnet Street

Site 2 – King Edward Memorial Park

Sites 3 and 4 – Industrial Buildings, School House Lane

Site 5 – Limehouse Basin

#### Deptford Tunnelling Area

Site 3 – Open space, Westferry Road (Sir John McDougal Gardens)

Site 4 – Vacant wharf/landing area, Bellgate Place

The Council supports the selection of the Abbey Mill route and objects strongly to the alternative routes and associated construction sites for the reasons set out below.

#### *Shadwell Basin/Garnet Street*

The Shadwell Basin site was considered by Thames Water as a main, intermediate or reception shaft site. The Council believes that the substantial community and environmental impacts associated with a construction project of this nature on this site raises a wide range of serious concerns.

We welcome the selection of alternative preferred sites and strongly advise against re-instating Shadwell Basin as a preferred site due to the significant adverse social, community and development impacts on the local area.

The Council is very concerned about the noise, vibration and dust impact associated with the construction of either type of shaft. The proximity of a grade II listed building and more than one hundred low rise, high density residential units overlooking and surrounding the site would not be capable of being provided with sufficient mitigation against impact. The existing ambient noise for the basin is likely to be very low and the need for very restricted noise levels and short construction windows during normal working hours would be necessary to provide some protection to adjacent residences, the school, the church and businesses. Working outside the Council's normal construction working hours policy would be unlikely to receive approval.

Shadwell Basin is used as a recreation space by residents and visitors of Borough. It provides much needed visual amenity in a highly built up section of the Borough.

Removal of this space for the period of time required to build a main or intermediate shaft would impact on:

- Water based recreation activities: The Basin is home to the not for profit Shadwell Basin Outdoor Activity Centre as well as Tower Hamlets Canoe Club. The Basin is essential to the operations of the centre as a water sport training facility. Apart from offering training and engagement in a variety of water sports, the centre also offers vocational training for young people to work towards gaining qualifications in outdoor activity and community sports coaching. In addition, the centre provides a resource for schools within Tower Hamlets. Levels of participation in sport and physical activity in Tower Hamlets are low and the Council and its partners have set ambitious targets to improve the health of residents in the Borough. Removing a key specialist sports facility runs contrary to those ambitions and the closure of a sports facility in an Olympic Borough is likely to have significant repercussions.
- The Strategic River Walkway, part of the Thames Path: Potential removal of access to the walkway would have serious implications for activities to promote active lifestyles in the local community under the Borough's Health and Wellbeing Strategy. Even if access to the walkway was maintained, loss of visual amenity, noise and dust impacts from the construction site will reduce the positive associations with this walkway, thereby reducing its use.
- Cycle routes around the Basin: Cycle routes form part of the LCN+ cycle network, and have high cycle traffic for residents commuting into London. Potential removal of access to these cycle routes would have serious implications for activities to promote active lifestyles in the local community. The removal of key cycle routes would undermine London-wide sustainable transport initiatives.

Shadwell Basin is one of the primary natural sites in the South Western section of the Borough. As a substantial open water space, close to a large open space (King Edward VIII Memorial Park), it is an integral part of a habitat site for birds, insects, plants and aquatic life. This status has been recognised through its designation as a Water Protection Area and a Site of Nature Conservation Importance (SNCI). It is also one of the intersection points of the Borough's Green Grid plan as set out in the Core Strategy, thus forming an important connection point in the Borough's green spaces.

Shadwell Basin is a Brimstone butterfly habitat. This is a direct result of biodiversity activities undertaken by the Council since 1985, when this butterfly was completely absent from the Borough. Buckthorns have been planted at Shadwell Basin under the Borough's biodiversity improvement plans to increase the population of this butterfly in the Borough.

The basin is part of the Blue Ribbon network, a key policy area for the London Plan. The Blue Ribbon Network serves as a valuable series of habitats for wildlife across London. Many parts of it are semi-natural systems and in such a heavily urbanised area, they often offer a sense of nature that has been lost across much of London.

### *King Edward Memorial Park*

The King Edward Memorial Park site was considered by Thames Water as a main, intermediate or reception shaft site as well as a location for CSO interception. The Council believes that the substantial community and environmental impacts associated with a construction project of this nature on this site raises a wide range of serious concerns.

We welcome the selection of alternative preferred sites for main tunnelling activity and support the selection of the foreshore adjacent to King Edward Memorial Park as a CSO interceptor site. We strongly advise against re-instating King Edward Memorial Park as a preferred site for main tunnelling activity or for CSO interception due to the significant adverse social, community and development impacts on the local area.

Our detailed comments on King Edward Memorial Park can be found in Part 2 of this questionnaire below.

### *Industrial Buildings, School House Lane*

This site was considered by Thames Water as an intermediate or reception shaft site. The Council believes that there would be adverse community and social impacts associated with a construction project of this nature on this site.

We welcome the selection of alternative preferred sites for tunnelling activity and advise against re-instating the site as a preferred site for such activity.

The Council is very concerned about noise, vibration and dust impact associated with the construction of this type of shaft. The proximity of adjacent housing would be very difficult to provide with sufficient mitigation against impact. It is likely that restricted noise levels and short construction windows during normal working hours would be necessary to provide some protection to adjacent residences and businesses. Working outside the Council's normal construction working hours policy would be unlikely to receive approval.

The adjacent A1203 highway to the south of the site has been designated a red route by TFL. It is a key transport artery for East London. The Council would have concerns about spill over impacts on traffic flow in the local area if the highway was restricted as a result of this project.

There is Cycle Super Highway adjoining the northern edge of the site. This is one of the major east-west routes for cyclists in London. Potential restricted access to this cycle route would have serious implications for activities to promote active lifestyles in the local community under the Borough's Health and Wellbeing Strategy, and across London more generally. Furthermore, loss of visual amenity, noise and dust impacts from the construction site will reduce current positive associations with this cycleway.

There is a multi-use ball games area immediately opposite the NW corner of the site. This provides a much needed play area for local children and young people, and the

Council is very concerned about any noise and dust impacts on this facility from the proposed project, and the impact this would have on children and young people's physical activity levels and their ability to play outside.

The neighbouring Shadwell Centre houses the Councils' Life Long Learning Service, and provides arts & leisure adult education classes as well as adult training, and employment services. Unemployment levels in Tower Hamlets are higher than both the London and national averages. This is mainly because of comparatively low levels of basic skills. Providing continued and undisturbed use of high quality training facilities is vital to improving employability, thereby reducing levels of worklessness in the Borough.

### *Limehouse Basin*

The Limehouse Basin site was considered by Thames Water as an intermediate or reception shaft site. The Council believes that the substantial community and environmental impacts associated with a construction project of this nature on this site raises a wide range of serious concerns.

We welcome the selection of alternative preferred sites and strongly advise against re-instating Limehouse Basin as a preferred site due to the significant adverse social, community and development impacts on the local area.

The Council is very concerned about noise, vibration and dust impact associated with the construction of this type of shaft. The proximity of more than one hundred medium and low rise, high density residential units overlooking and surrounding the site, together with boat moorings, would not be capable of being provided with sufficient mitigation against impact. The ambient noise for the basin is likely to be reasonably low and the need for very restricted noise levels and short construction windows during normal working hours would be necessary to provide some protection to adjacent residences, moorings and businesses. Working outside the Council's normal construction working hours policy would be unlikely to receive approval.

Limehouse Basin is the Thames access point for two of London's major canal systems, Regent's Canal and the Limehouse Cut which leads to the Lea River. Any restriction to boating traffic access to these canals would have significant impacts on people who live on barges, the livelihood of tour operators, and community activities.

Limehouse Basin is used as a recreation space by residents and visitors to the Borough. It provides much needed visual amenity in a highly built up section of the Borough.

Removal of this space would impact on:

- Limehouse Marina: Limehouse Basin provides 90 berths for river, canal and sea-going vessels. It is also the home of the UK Branch of the Cruising Association. Restrictions to access to the marina would have an adverse impact on this community organisation and the leisure activities it promotes.

- The Strategic River Walkway, part of the Thames Path: Potential removal of access to the walkway would have serious implications for activities to promote active lifestyles in the local community under the Borough's Health and Wellbeing Strategy. Even if access to the walkway was maintained, loss of visual amenity, noise and dust impacts from the construction site will reduce the positive associations with this walkway, thereby reducing its use.
- Cycle routes around the Basin: These form part of the Cycle Super Highway, and have high cycle traffic for residents commuting into London. Potential removal of access to these cycle routes would have serious implications for sustainable travel initiatives in Tower Hamlets and the wider London area.

Limehouse Basin a large body of water sitting just off the Thames river, and is the end point for two canal systems, as such it is an important wetland habitat and has been declared a site of metropolitan importance for biodiversity by the GLA. It is covered by the London biodiversity strategy. It is one of the intersection points of the Borough's Green Grid plan, thus forming an important connection point in the Borough's green spaces.

Regent's Canal Dock, part of Limehouse Basin, is one of London's earliest docks. It was built in 1820, preceded only by the East & West India Docks and the London Docks. It is the oldest dock still operating as originally planned, and therefore has significant heritage value to the Borough, London and the boating community.

The basin is part of the Blue Ribbon network, a key policy area for the London Plan. The Blue Ribbon Network serves as a valuable series of habitats for wildlife across London. Many parts of it are semi-natural systems and in such a heavily urbanised area, they often offer a sense of nature that has been lost across much of London.

#### *Open space, Westferry Road (Sir John McDougal Gardens)*

The West Ferry Road site was considered by Thames Water as a main, intermediate or reception shaft site. The Council believes that the substantial community and environmental impacts associated with a construction project of this nature on this site raises a wide range of serious concerns.

We welcome the selection of alternative preferred sites for main tunnelling activity which have resulted from the route re-alignment. We strongly advise against re-instating the Westferry Road site as a preferred site for main tunnelling activity due to the adverse social, community and development impacts on the local area.

The Council is very concerned about noise, vibration and dust impact associated with the construction of either type of shaft. The proximity of housing adjacent the site would not be capable of being provided with sufficient mitigation against impact. The ambient noise for the park is likely to be relatively low and the need for very restricted noise levels and short construction windows during normal working hours would be necessary to provide some protection to adjacent residences. Working outside the Council's normal construction working hours policy would be unlikely to receive approval.

Westferry Road, which runs along the eastern edge of the site, is the only access route around the Isle of Dogs, carrying large numbers of buses that serve the area. The Council would be very concerned about any disruptions to access to this road as it would have a direct impact on residents. Any applications to close access to the road for construction purposes for considerable periods of time would be very unlikely to receive approval.

Sir John McDougal Gardens is used as a recreation space by residents and visitors of Borough. Tower Hamlets is deficient in publicly accessible open space and the Open Space Strategy 2006 identified that the borough fell significantly short of the national standard of 2.4ha of open space per 1,000 residents. In 2006 Tower Hamlets only had 1.2ha per 1,000 residents.

The Millwall ward within which Sir John McDougal Gardens are located, has an even greater shortage of open space than the borough as a whole. The ward is less densely populated than other parts of the borough though the impact of taking Sir John McDougal Gardens out of use for a prolonged period would still be significant as the site is the only significant open space in the ward. Catchment area analysis<sup>1</sup> shows that if the park was taken out of use, residents would be outside the catchment area of any significant open space. The nearest significant open space would be Millwall park, which would see increased usage from residents unable to access Sir John McDougal Gardens. The park is one of the intersection points of the Borough's Green Grid plan, thus forming an important connection point in the Borough's green spaces.

Removal of this space for the period of time required to build an intermediate shaft would impact on:

- The Strategic River Walkway, part of the Thames Path: Potential removal of access to the walkway would have serious implications for activities to promote active lifestyles in the local community under the Borough's Health and Wellbeing Strategy.
- Cycle routes around the foreshore, which form part of the LCN+ cycle network, and have high cycle traffic for residents commuting into London. Even if access to the walkway was maintained, loss of visual amenity, noise and dust impacts from the construction site will reduce the positive associations with this walkway.
- Opportunities for local residents and office workers to support an active and healthy lifestyle: The park provides opportunities for a place for individual exercise, informal sports and to walk dogs. There are also two children's play areas on the site, promoting active lifestyles to children in the Borough and helping to reduce the incidence of childhood obesity rates. Millwall ward has been identified as deficient in play space and removing the play space within the site would be contrary to the Council's plan to provide high quality play space for children within easy reach of their homes.

*Vacant wharf/landing area, Bellgate Place*

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The Bellgate Place site was considered by Thames Water as an intermediate or reception shaft site. The Council believes that the substantial community and environmental impacts associated with a construction project of this nature on this site raises a wide range of serious concerns.

We welcome the selection of alternative preferred sites for main tunnelling activity which have resulted from the route re-alignment. We strongly advise against re-instating the Bellgate Place site as a preferred site for main tunnelling activity due to the adverse social, community and development impacts on the local area.

The Council is very concerned about noise, vibration and dust impact associated with the construction of this type of shaft. The proximity of a significant number of low rise, high density residential units, and a school overlooking the site would not be capable of being provided with sufficient mitigation against impact. The ambient noise for the slipway is likely to be low and the need for very restricted noise levels and short construction windows during normal working hours would be necessary to provide some protection to adjacent residences. Working outside the Council's normal construction working hours policy would be unlikely to receive approval.

Westferry Rd, which runs along the eastern edge of the site, is the only access route around the Isle of Dogs, carrying many buses that serve the area. The Council would be very concerned about any disruptions to access to this road as it would have a direct impact on residents. Any applications to close access to the road for construction purposes would be unlikely to receive approval.

The slipway is part of the Blue Ribbon network, a key policy area for the London Plan. The Blue Ribbon Network serves as a valuable series of habitats for wildlife across London. Many parts of it are semi-natural systems and in such a heavily urbanised area, they often offer a sense of nature that has been lost across much of London.

Removal of this space would impact on:

- The Strategic River Walkway, part of the Thames Path: Potential removal of access to the walkway would have serious implications for activities to promote active lifestyles in the local community under the Borough's Health and Wellbeing Strategy. Even if access to the walkway was maintained, loss of visual amenity, noise and dust impacts from the construction site will reduce the positive associations with this walkway, thereby reducing its use.
- Cycle routes around the foreshore: These form part of the LCN+ cycle network, and have high cycle traffic for residents commuting into London. Potential removal of access to these cycle routes would have serious implications for sustainable travel initiatives in the sub-region.
- Children's play area on the site: This managed is by the adjacent residential units and removal of this facility would have an impact on opportunities for promoting active lifestyles to children in the Borough and helping to reduce the incidence of childhood obesity rates in line with the Borough's Health and Wellbeing Strategy. Millwall ward has been identified as deficient in play space and removing the play space within the site would be contrary to the Council's plan to provide high quality play space for children within easy reach of their homes.

### Engineering Reasons

The Council recognises that the Abbey Mill route involves

- fewer tunnel drives,
- fewer tunnel boring machine launch, reception or intermediate sites,
- shorter tunnelling,
- less spoil and
- less construction through the chalk strata.

We also understand that the overall capacity of the storage system through this route is broadly the same as the other two options and is consequently more cost effective.

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

### *Site Selection Methodology*

It is recognised that the selection of preferred sites has been identified using the Projects rigorous Site Selection Methodology. The selection process was the subject of two rounds of consultation with affected London Boroughs and pan-London stakeholders. Thames Water has taken this as approval for using the method for selecting preferred sites. The Council accepts the appropriateness of this multidisciplinary, iterative approach which takes account of community, planning, environmental and engineering constraints.

### *Impact Mitigation & Monitoring*

Construction of any large-scale infrastructure project such as the Thames Tideway Tunnel will inevitably lead to disruption and have impact on local amenity and people's lives. The Council has significant experience of negotiating the management of impact, monitoring controls and supporting developers in minimising adverse impact. The Council has developed this experience in relation to major transport infrastructure projects such as the construction and expansion of the Docklands Light Railway (DLR), Jubilee Line and East London Line extensions and Crossrail tunnelled section as well as the construction of the infrastructure for the London 2012 Olympic Games and Canary Wharf.

The Council will seek to ensure the implementation of the best practice which will minimise impact. It will monitor the impact, respond to community concerns and intervene where necessary. In order to support the project effectively, the Council will seek additional resourcing from the promoter to support this work. Similar arrangements have been put in place for Crossrail, DLR and the Olympic Park construction which allow the Council to allocate dedicated resource to the project promoter and residents. Additional resources are also needed for constructive and successful negotiation of formal agreements on a site by site basis. Risk to the Project can be significantly reduced where the Council is provided with adequate resources and is able to smoothly process agreements and deliver support.

### *Compensation and Reinstatement*

The consultation documentation does not set out clearly what compensation arrangements will be put in place to compensate for loss of access to areas, disruption to services or other impacts resulting from construction work. The Council will seek clarification from the project promoter to ensure appropriate arrangements are set up.

### *Ground Settlement*

The consultation does not specifically clarify the approach that will be taken towards ground settlement. The Council expects that the Project will adopt good practice when dealing with the potential or actual impact of ground movement that may arise from tunnelling and construction. There will need to be a Settlement Policy and the opportunity for residents to apply for a Settlement Deed. As a minimum the Council would expect the Project to

- find out how much settlement there may be and what effect this will have on buildings;
- where necessary, carry out work to reduce the effect of this settlement;
- check ground movement and, where necessary, building movement;
- find out if there were already defects in buildings and
- pay for work to repair damage that is caused.

### *Odour and Noise Control*

The Council welcomes the commitment and early consideration of design which is intended to ensure that the tunnel does not emit odour and cause nuisance. The Council expects that the Project will adopt good practice in respect of design and operation of the tunnel. We will want to see an operational policy for the tunnel which will specify appropriate standards for the control of odour and noise.

### *Planning Policy Context*

The Council recognises planning applications will not be submitted to individual Councils seeking their specific consent. Rather they will be submitted to the Central Government body which will replace the Planning Infrastructure Commission. It is understood that this will be the proposed Major Infrastructure Planning Unit in the Planning Inspectorate. Whilst Councils will be consulted at this stage of the process, they will not be the decision makers. The Council will respond to any formal process as part of a future planning application in the appropriate manner and will take the relevant policies into account when doing so. However, we wish to highlight some of the relevant and emerging Council policy that would be expected to be considered in the determination of any planning application.

The Core Strategy was formally adopted by Full Council on 15 September 2010 and is now part of the borough's 'Development Plan' (alongside the London Plan (2008) and retained UDP (1998) policies in accordance with Core Strategy Appendix 5). As such it carries equal weight to the London Plan (2008) and retained UDP (1998) policies (in accordance with Core Strategy Appendix 5).

The Thames Tunnel is recognised as being a “Necessary Priority” in the Infrastructure Delivery Plan (IDP) within the Core Strategy. As such, the Council is aware of the importance of this key piece of infrastructure to the Borough and the wider London area.

New DPDs as part of the LDF are required to identify which policies will be superseded by the policies contained within the new DPD.

Appendix Five (Superseded policies) of the Adopted Core Strategy sets out which policies within the Core Strategy replace those contained within the Unitary Development Plan (UDP) and Interim Planning Guidance (IPG) documents.

Superseding all the current policies will be a gradual process as the Council prepares, and eventually adopts the forthcoming DPDs (Development Management DPD, Sites and Placemaking DPD and Fish Island AAP).

As the retained IPG policies (Core Strategy Appendix 5 – Superseded policies) were a component part of the Core Strategy Examination in Public these are considered to have significant weight. They will continue to be material consideration in informing planning decisions.

The table in Appendix Five (p.154) of the Core Strategy sets out which policies within the Core Strategy DPD replace those contained within the Unitary Development Plan (UDP) and Interim Planning Guidance (IPG) documents.

The saved UDP and IPG policies will remain saved and used for the purposes of development decisions. Over the next 18 months these policies will be replaced by new policies within future DPDs, such as the Development Management DPD, Place and Site and Placemaking DPD and Proposals Map DPD.

The use of relevant planning controls will be dependant upon the timing of the application for planning approval. At present Thames Water have advised that an application for planning approval will be lodged in 2012, by which time it is anticipated that additional DPD's will be in place.

The Interim Planning Guidance (October 2007) and (IPG's) Unitary Development Plan 1998 would need be taken into consideration if applications were lodged at the present time. (The principles that are established within these will no doubt be reflected in the new LDF Documents.)

In relation to the proposed King Edward Memorial Park Proposal, we would draw particular attention to the IPG OSN3. Blue Ribbon Network and the Thames Policy Area. This policy seeks to ensure that any development in, or adjacent to the Blue Ribbon Network and Thames Policy Area will take into consideration the specific character and functions of the area as set in the London Plan: regional drainage and water supply, a setting for development, an open area and ecological resource, a transport artery and a recreational, leisure and tourist facility.

“1. All development on or adjacent to the Blue Ribbon Network, including the Thames Policy Area, must respect its water location and should particularly:

- a) include a mix of uses appropriate to the water space, including public uses and open spaces;
- b) respect waterway heritage;
- c) enhance opportunities for views across and along waterways;
- d) ensure appropriate access for all to the water and opportunities for enjoyment of the water; and
- e) provide for suitable flood defences.

The policy states that Proposals for non-residential moored vessels and structures in or over river, canal or dock areas will only be supported if they are:

- a) essential to the movement of goods or passengers by water; or
- b) lead to an increase in the recreational and educational use of the rivers docks, canals, or basins.

“4. All applications for major development adjacent to the Blue Ribbon Network, including those within the Thames Policy Area, are required to be accompanied by an assessment covering:

- a) impacts of scale, mass, height, silhouette, density, layout, materials and colours on the water and surrounding environment;
- b) proposals for water edge, visual and physical permeability and links with hinterland, public access, including addressing safety provision, landscaping, open spaces, street furniture and lighting;
- c) impacts of the proposal on the water space to demonstrate how the water space will be used and affected including impacts on biodiversity and hydrology; and
- d) impact on Strategic Views, in particular River Prospects and on important local views.

5. Proposals for new structures over and/or into the Blue Ribbon Network should be accompanied by a risk assessment covering impacts on navigation, hydrology and biodiversity and proposed mitigation measures for identified impacts.”

## Part 2

### Which site are you commenting on?

King Edward Memorial Park Foreshore

#### 1. Please give us your views on this site.

The Council acknowledges that some work will need to be carried out in close proximity to the existing North East Storm Relief to connect it to the main tunnel via a drop shaft. The Council considers that the use of the proposed foreshore site minimises the impact on residents by protecting valuable open space and by creating additional open space in the medium term. The use of foreshore sites, wherever possible and accessible from the shore area adjacent is preferable to removing land from a highly populated Borough which is deficient in open space.

#### 2. What do you think are the most important matters for us to consider when developing our proposals for this site?

##### *Construction and Environmental Impact Assessment & Mitigation*

The proposed site is in a sensitive location close to residential properties, major transport infrastructure and a key open space. Of particular concern is the proximity of the haul route to residential properties to the east of the park.

In addition to adopting the requirements set out within the Council's Code of Construction Practice (CoCP), the project CoCP, Construction Environmental Management Plan (CEMP) and various operational Environmental Management Plans will need to be agreed with the Council. Consultation with the Council's Environmental Health Officers (EHO's) will be needed to agree the various method statements, monitoring frameworks, and in developing Conditions addressing issues and requirements specific to Tower Hamlets.

It is expected that some level of environmental assessment work will have been carried out in the development and testing of options. The Council requests clarification on the EIA strategy for the scheme, including the dates of various deliverables and when Local Authorities will have a chance to see any results and provide comments or consult local stakeholders (e.g. what are consultation arrangements for the Environmental Statement and any Environmental Report leading up to it?).

The Council would certainly welcome the chance to consult on the scope of the environmental assessment for any works within the Borough. This would allow us to highlight key issues for Tower Hamlets, suggest preferred methodologies and identify schemes which should be included for any Cumulative Effects Assessment (CEA).

In addition the Council would want to see and contribute to any Impacts and Aspects Register (proposed mitigation), and the outlines of any CEMPs, EMPs and CoCPs into which they Register may be included and implemented.

In the interests of co-operation, there may be some potential for the Council to provide to the project some environmental and social baseline data for the purposes of environmental assessments should it be required.

### *Biodiversity*

The Thames (and its foreshore) is part of the Blue Ribbon network, a key policy area for the London Plan. The Blue Ribbon Network serves as a valuable series of habitats for wildlife across London. Many parts of it are semi-natural systems and in such a heavily urbanised area, they often offer a sense of nature that has been lost across much of London. Any construction on the Blue Ribbon network would need to align with the Mayor of London's policy statement on development of the Blue Ribbon Network as outlined above. The Council will seek clarification of the biodiversity impacts of construction in this location through the EIA.

The park lies within the 'Limehouse Basin to Swedenborg Gardens' Biodiversity Enhancement Zone (BEZ), a local designation indicating an area deficient in biodiversity and the entire area is also considered a 'Black Redstart Habitat Creation Zone'. As such, any works in these areas should cause both minimal disturbance to existing biodiversity assets during construction, as well as aiming to improve biodiversity offer in the long-term when the haul route is re-instated to parkland and through the design of the permanent facility. This might include green roofs and walls, bird / bat boxes, swift bricks and areas of habitat managed for Black Redstart nesting / foraging.

Indeed, the proposed haul route along the eastern edge of the park cuts through an area that has been specifically designated a wildlife area and is managed accordingly. Particular consideration will need to be given to the impact on biodiversity when planning and implementing the haul route.

### *Community and Social Impacts*

As outlined in detail under Question 4 below, King Edward Memorial Park provides a range of leisure and sporting facilities in an area highly deficient in public open space.

The proposed foreshore site still requires some land take within the park and construction may impact on the usability of the facilities. The land take should be minimised by continual review of the haul route alignment. It is indicated that the construction site may vary in size throughout the works. The Council would wish to clearly understand the proposed land take and urges Thames Water to minimise requirements wherever possible in order to retain as much space as possible for public use.

It is understood that the haul route alignment has been chosen to provide access from the main road and to avoid impact on leisure and recreational facilities. This has

resulted in an alignment in close proximity to residential properties. The Council wishes to understand the options for the haul route alignment considered by Thames Water. The Council also wishes to understand whether an alignment can be achieved that moves the route away from residential properties whilst maintaining leisure facilities.

Access along the Strategic River Walkway and riverfront cycle route should be maintained throughout the construction process, ideally at grade to ensure full accessibility of this strategic connection for all users. Severance of the link would have significant implications for initiatives to promote sustainable travel and active lifestyles through the provision of traffic free routes.

### *Road Access and Traffic Management*

Transport for London is the Highway authority for The Highway and the ultimate arbiter of the acceptability of the proposed vehicular access to King Edward Memorial Park and continuing to the foreshore. Nevertheless, because of the impacts on Tower Hamlets' park users, cyclists and pedestrians, the Council has the following comments and advice.

It is vital that the river is used to transport construction materials to and from the site; it may also be suitable for conveying equipment to service the site if a suitable landing is constructed as part of the permanent platform out into the Thames. Retaining a landing could benefit future passenger river services, given this location is about half way between two existing piers.

Thames Water should supply details of the size, weight/length, frequency and timing and routing of construction traffic in the form of a Construction Management (Logistics) Plan to LBTH and Transport for London and justify the modal split between river and road transportation. This will help the Council both assess and reduce both temporary and permanent impacts on already congested highways and in particular pedestrians and cyclists using the Thames foreshore at this point. The Council will seek to recover costs of repairing damage to its highways from construction traffic through a Legal Agreement.

Detailed Design work will be needed before the Council can be satisfied that the safety, accessibility and amenity of pedestrians, cyclists, the disabled users and people pushing buggies will be adequately safeguarded. We are concerned that level access will be removed to a large stretch of the Park if the current easterly entrance off the Highway is converted to hoarded-off vehicular access only. Addressing this will require further detailed design work as will the considerable change in level between the Highway and the Park. Embanking the new access will change the character of the park, even if it were feasible to retain a 'grass-crete' or porous paving grid arrangement post-construction, which would be the preference in the event a riverside landing for servicing traffic cannot be provided. Finally, more explanation is required as to the impacts of the construction on the foreshore's well-used 'Greenway' shared cycle and pedestrian route.

The proposed access off the Highway has potential to cause queuing back along the westbound carriageway back to the Limehouse Link Tunnel. The entrance would

need to be widened considerably to accommodate HGVs, and it is very likely there would need to be a 'Left turn in only' and left turn out only' restriction to maintain highway safety and minimise congestion. Transport for London should comment further.

We do not consider Glamis Road (LBTH Highway) a suitable alternative access for construction traffic as it is relatively narrow (approx 7.6m kerb to kerb, two way), it is part of the Cycling network and it carries a comparatively large volume of traffic - including single decker buses- with a weight restriction of 7.5t.

### **3. Please provide any other information which may be relevant to our choice of site.**

#### *Core Strategy – Placemaking Context*

Through the Annex to the Core Strategy *Delivering Placemaking* the Core Strategy articulates a vision for Limehouse, as:

*A better connected riverside place supported by new neighbourhood centres on and around Commercial Road*

*The waterside communities that nestle along the River Thames, Regent's and Limehouse Cut Canals will be better connected to Commercial Road. Visitors will be able to better explore the Thames Path, the historic buildings and the pubs and restaurants along Narrow Street.*

*The existing cluster of shops, café and restaurants along Commercial Road and around Limehouse DLR, will be supported by the recognition of a new neighbourhood town centre. The historic area of St Anne's Triangle will be regenerated offering improved access to the Limehouse Cut Canal.*

We would expect that the development at King Edward Memorial park on completion would provide a positive contribution toward supporting the future vision for the area and we would expect high quality open space and connections to be developed as a part of this.

The completed project around King Edward Memorial Park Open Space, will provide the opportunity to provide additional open space. The work site is adjacent the conservation area at King Edward Memorial Park. As such it is important that Core Strategy SP10 *Creating Distinct and Durable Places* is acknowledged and consistent with this *that the final development Preserves or enhances the wider built and historic environment of the borough, enabling the creation of locally distinctive neighbourhoods through encouraging and supporting development that [preserves and enhances the heritage value of the immediate and surrounding environment and wider setting.*

It will be important that the linear Thames Path Route is maintained also during and after construction.

#### **4. If you think another site should be used, please tell us which one and why.**

Within the context of the site options for intercepting the North East Storm Relief, the Council considers the use of the foreshore site to be least problematic.

The selection of the foreshore site offers the most viable option for the Council, as selection of the main area of King Edward Memorial Park would raise significant environmental and community concerns. Likewise the Council also welcomes the selection of the Limehouse area for interceptor sites only and recognises that the preferred route does not require the use of any sites in Tower Hamlets for main tunnelling activity. We strongly advise against the use of the main park for construction purposes, either for interception or main tunnelling, for the reasons set out below.

The Council is very concerned about noise, vibration and dust impact associated with the construction of either type of shaft. The proximity of high density residential units overlooking and opposite the site would not be capable of being provided with sufficient mitigation against impact.

The Rotherhithe Tunnel runs directly underneath the east end of the park. The tunnel is one of only three traffic connections across the Thames to the east of Tower Bridge, and it is highly likely that TFL would look unfavourably on any disruption to the flow of traffic along the tunnel. Likewise the Council would be concerned about any flow on effects on local traffic in the area, and impacts on the local economy from disruptions to traffic flow along the tunnel

EDF Energy have applied for permission to use a small section in the NW corner of the park as a permanent access shaft for their project to construct a power cable tunnel across the Borough. This project is currently planned for the same period as the Thames Water project, so there is a serious possibility of conflict over these two tunnelling projects.

The Council is extremely concerned about any proposal which would remove this Open Space which is vital to the local community. It is the borough's third most visited park and is the key public greenspace in the locality. It has been awarded a Green Flag as a result of strategic Borough activities to improve the park since 2005.

Tower Hamlets is deficient in publicly accessible open space and the Open Space Strategy 2006 identified that the borough fell significantly short of the national standard of 2.4ha of open space per 1,000 residents. In 2006 Tower Hamlets only had 1.2ha per 1,000 residents. The Shadwell ward within which King Edward Memorial Park is located, has an even greater shortage of open space than the borough average making King Edward Memorial Park an important space for residents in this part of the borough. Shadwell ward is the fourth most densely populated ward in the borough with 140 residents per ha. It is also one of the more deprived wards in the borough. Other open spaces in the ward are very small and

using the park as a work site effectively reduces the amount of spaces available in the ward to near nil. This would be exacerbated by the proposal to utilise St James' Gardens, which are located to the east of the ward.

Catchment area analysis shows that if the park was taken out of use, residents in the Shadwell ward south of the Highway would lose all access to publicly accessible open space within acceptable walking distance. The nearest significant open space would be Stepney Green to the north, which is difficult for residents of this ward to access as it is cut off by two arterial roads and a railway line. Large parts of Stepney Green will be taken out of public use for the construction of Crossrail.

Consultation evidence demonstrates that the park attracts users from all sectors of the community, including the local residential population, workers from nearby businesses and office complexes, and tourists who use the park for its excellent views of the Thames and its location on the Thames Path.

The park is a popular venue for local community events and has hosted medium sized gatherings such as the Millennium celebrations on the Thames and was a Beacon lighting site for the Queen's Golden Jubilee celebrations. It is used as a site for educational activities, community events and corporate working days, run by Trees for Cities (TFC) to promote the outdoor activities available in the park. More detail on these activities is available below in our comment on Biodiversity Issues.

Removal of this space for the period of time required to build a main or intermediate shaft would impact on:

- Opportunities for local residents and office workers to support an active and healthy lifestyle. The park is very popular with joggers and as a place for individual exercise, informal sports e.g. cricket, and to walk dogs.
- The Strategic River Walkway, part of the Thames Path: Potential removal of access to the walkway would have serious implications for activities to promote active lifestyle. Even if access to the walkway was maintained, loss of visual amenity, noise and dust impacts from the construction site will reduce the positive associations with this walkway, thereby reducing its use.
- Cycle routes around the park and along the foreshore: These form part of the LCN+ cycle network, and have high cycle traffic for residents commuting into London. Potential removal of access to these cycle routes would have serious implications for activities to promote active lifestyles and sustainable travel.
- Recreation Facilities: Playing pitches for tennis, netball and football, a bowling green and a junior/toddler equipped play area.
- The park is a key location for outdoor team sports in the Borough.
  - The park has been identified for future improvement to address the current shortage of playing pitches for competitive sport and is deemed to be a future key location for outdoor team sports in the Borough.
  - A turf lawn bowls green is run by Shadwell Bowls Club and provides six rinks for use between May and September. Bowling is a key activity for our senior residents. It encourages physical activity and reduces social isolation experienced by older members of society. Removing this bowling green as part of the project would reduce the number of bowling greens in the borough by 25%.

TFC as a key partner organisation managing the site has enhanced the wildlife opportunities in the park and proactively engaged the local community in these activities. TFC staff attend Tower Habitats Biodiversity Action Group meetings and the park is managed with reference to the Biodiversity Action Plan. The eastern end of the park has been designated a wildlife area and is managed accordingly. This area is used by local school groups as an outdoor classroom.

TFC have also run habitat creation workshops in the park with pupils from local schools, involving them and other community volunteers in building bird boxes, log piles, hedge planting etc., to encourage more wildlife into the park. In 2008 planting was commenced around the refurbished pond to increase aquatic and riparian wildlife habitat.

The park is one of the intersection points of the Borough's Green Grid plan, thus forming an important connection point in the Borough's green spaces.

Many of the park's original features are in situ, including

- the staircase leading to the memorial to King Edward VIII
- the raised promenade.
- the Grade II listed ventilation shaft and access points for the former Rotherhithe foot tunnel
- a memorial to the navigators; Stephen and William Borough, Sir Hugh Willoughby and Martin Frobisher.
- the bandstand

A large part of the park is designated an area of archaeological importance

##### **5. Please comment on our ideas for how a site might look after consultation (see artist's impression).**

The Council welcomes the proposal to create additional open space within an area highly deficient in public open space. We understand that the artist's impressions are indicative only. The Council wishes to be closely involved in developing the design/massing and determining the location of any permanent features on the site. King Edward Memorial Park benefits from panoramic views across the River Thames towards Canary Wharf. It is the waterfront location of the park which gives it its special character. The Council would wish to see the views across the park preserved. The current proposals would block views from within the park by placing structures in the centre of the foreshore.

## **Which site are you commenting on?**

Butcher Row

### **1. Please give us your views on this site.**

The Council acknowledges that some work will need to be carried out in close proximity to the existing Holloway Storm Relief to connect it to the main tunnel via a drop shaft. The Council considers that the use of the proposed vacant site at Butcher Row minimises the impact on residents by protecting valuable open space and by creating additional open space in the medium term. The vacant site is also likely to provide greater scope to mitigate impact on residential properties than the foreshore site.

### **2. What do you think are the most important matters for us to consider when developing our proposals for this site?**

#### *Construction and Environmental Impact Assessment & Mitigation*

The proposed site is in a sensitive location close to residential properties, major transport infrastructure, and St Katherine's Chapel, a Grade II listed building. The proximity of adjacent housing is of particular concern.

In addition to adopting the requirements set out within the Council's Code of Construction Practice (CoCP), the project CoCP, Construction Environmental Management Plan (CEMP) and various operational Environmental Management Plans will need to be agreed with the Council. Consultation with the Council's Environmental Health Officers (EHO's) will be needed to agree the various method statements, monitoring frameworks, and in developing Conditions addressing issues and requirements specific to Tower Hamlets.

It is expected that some level of environmental assessment work will have been carried out in the development and testing of options. The Council requests clarification on the EIA strategy for the scheme, including the dates of various deliverables and when Local Authorities will have a chance to see any results and provide comments or consult local stakeholders (e.g. what are consultation arrangements for the Environmental Statement and any Environmental Report leading up to it?).

The Council would certainly welcome the chance to consult on the scope of the environmental assessment for any works within the Borough. This would allow us to highlight key issues for Tower Hamlets, suggest preferred methodologies and identify schemes which should be included for any Cumulative Effects Assessment (CEA).

In addition the Council would want to see and contribute to any Impacts and Aspects Register (proposed mitigation), and the outlines of any CEMPs, EMPs and CoCPs into which they Register may be included and implemented.

In the interests of co-operation, there may be some potential for the Council to provide to the project some environmental and social baseline data for the purposes of environmental assessments should it be required.

### *Biodiversity*

The land parcel lies within a 'Black Redstart Habitat Creation Zone' and protected species records indicate a number of sightings very nearby in and around the Limehouse Basin. As such, we would encourage the design of the permanent facility to improve biodiversity offer in the long-term. This might include green roofs and walls, bird / bat boxes, swift bricks and areas of habitat managed for Black Redstart nesting / foraging.

Brownfield land, such as this site, is often rich in biodiversity and we welcome the Phase 1 Habitat Surveys planned for all sites being considered. Should it become apparent that any biodiversity assets of significance are existing in the works site, the Council would expect appropriate mitigation and compensation measures to be implemented, and would welcome the chance to advise on any mitigation strategy proposed in order to align it with our Local Biodiversity Action Plan objectives.

### *Community and Social Impacts*

Tower Hamlets Cabinet recently adopted the Borough's Core Strategy, as part of the Local Development Framework. The Core strategy sets the vision for regeneration of the Borough through its Hamlets, specifically by redefining and applying a town centre hierarchy. One of the neighbourhood centres to be developed under the Core Strategy is the area around Limehouse DLR station. The Council wishes to create a new neighbourhood centre in this area that contains a range of shops including essential uses that serve the very local catchment area.

Furthermore, Limehouse area has been designed as medium growth area under the Core Strategy, with provision for a further 2000 - 3000 units in the area. The reduction of over-crowding is the current strategic focus of the Council, it has an ambitious target to increase housing in the Borough. Any permanent removal of vacant land in this locality for a project such as the proposed Thames tunnel will potentially jeopardise the Council's ability to deliver this priority outcome in the Limehouse area.

This site is very close to Limehouse DLR station. This station recently underwent major construction work to upgrade the interchange at the station as part of the three-car Docklands Light Railway scheme. The Council is concerned about the cumulative effect of major infrastructure construction works on the local population.

### *Road Access and Traffic Management*

The Council will require Thames Water to submit at an early stage a Construction Management (Logistics) Plan. Transport for London is the Highway Authority for the proposed site access & egress (off Butcher Row, an access also to the Royal Foundation of St Katherine). The Council is concerned by the proposal to use some

50m of LBTH Public Highway as a construction site - ie Ratcliffe Lane from Bekesbourne Street until where it emerges from under Network Rail's bridge carrying the DLR and Overground services. The Lane provides an alternative pedestrian 'cut-through' to avoid the somewhat congested footway conditions on Commercial Road.

Technical Approval, in accordance with BD2/05, will be required for all temporary & permanent works that are either adjacent to or over/under the Public Highway. The proposed new footway between Butcher Row & Ratcliff Lane should be built to an adoptable standard. If the new footway is planned to be adopted then there should be an agreed 'commuted sum' paid by Thames Water to LBTH in order to pay towards all future maintenance costs. The agreed sum should include for maintenance to & replacement off the footway surfacing materials, street lighting & surface water drainage. If it agrees to block off access, the Council will need either to allow a series of Temporary road closures or it would Stop Up the Road and re-dedicate it at the end of construction once restored to adoptable standards.

Blocking Ratcliffe Lane off could have very serious implications for the operation of Rotherhithe tunnel, given drivers use it as a pressure-release away from the long queues of traffic that tail back from the lights at the junction of Branch Road with Commercial Road. The latter junction could be overloaded were Ratcliffe Lane be cut off.

### **3. Please provide any other information which may be relevant to our choice of site.**

#### *Core Strategy – Placemaking Context*

Through the Annex to the Core Strategy *Delivering Placemaking* the Core Strategy articulates a vision for Limehouse, as:

*A better connected riverside place supported by new neighbourhood centres on and around Commercial Road*

*The waterside communities that nestle along the River Thames, Regent's and Limehouse Cut Canals will be better connected to Commercial Road. Visitors will be able to better explore the Thames Path, the historic buildings and the pubs and restaurants along Narrow Street.*

*The existing cluster of shops, café and restaurants along Commercial Road and around Limehouse DLR, will be supported by the recognition of a new neighbourhood town centre. The historic area of St Anne's Triangle will be regenerated offering improved access to the Limehouse Cut Canal.*

We would expect that the development at Butcher on completion would provide a positive contribution toward supporting the future vision for the

area and we would expect high quality open space and connections to be developed as a part of this.

The completed project will provide the opportunity for a medium sized open space, at Butcher Row in an area where there is a low provision of green space. As such it is recommended that there is strong consideration of replacing the proposed hard stand surface area with green open space that can be used by local residents and visitors to the area.

The provision of additional open space at the conclusion of the building work will assist in delivering Core Strategy Strategic Policy 3 (SP03) “Creating a Green and Blue Grid”. This will aid in creating *“new green corridors and enhancing existing ones to connect publicly accessible open spaces to main destination points, such as town centres, schools, health facilities, other publicly accessible open spaces, and also to, and along, waterspaces.”*

Within Strategic Policy 9 (SP09) *Creating Attractive and Safe Streets and Spaces* the Core Strategy identifies “Public Realm Improvement Areas”. Through this the Council is implementing a street hierarchy that puts pedestrians first and promotes streets, both as links for movement and places in their own right, to ensure a strategic, accessible and safe street network across the borough. This will be done through working with Transport for London to ensure that main streets’ primary function of distributing vehicle traffic (particularly their importance for providing bus routes) is maintained and protected. Also we are working with TfL to design and promote these streets as important places for pedestrians and cyclists. Butcher Row and Branch Road are included as main streets, and to this end will be a focus of Council’s public realm improvement objectives over the coming years.

It will be important to understand the full impact of the proposal on the opportunities to develop Butcher Row and that appropriate remediation opportunities are considered. These may potentially include the upgrade of the Butcher Row public realm. The Council will need to be provided with key details including the timing and length of proposed operation of the Butcher Row site for construction.

The use of the site by heavy vehicles for an extended period of time fetters the Council’s opportunity to undertake public realm improvement works, as construction vehicles will require access to Butcher Row, to access the site. During this time the Council may not be able to close the road if required to undertake desired public realm works and any such works may be damaged by the heavy vehicles once put in place and the main construction site was operating.

In addition, the recently constructed cycle super highway passes close to the south west corner of the Butcher Row site. The cycle route crosses Butcher Row at this point and there will need to be consideration of potential conflict between vehicles/cycles.

The proposal identifies Ratcliffe Lane for occupation as “a shorter term construction area”. The Council will need to understand the nature of what is proposed in this location, including timescales and the impact on traffic movements.

#### **4. If you think another site should be used, please tell us which one and why.**

Within the context of the site options for intercepting the Holloway Storm Relief, the Council considers the use of the Butcher Row site to be least problematic.

The selection of the Butcher Row site offers the most viable option for the Council, as selection of St Jame’s Gardens would raise significant environmental and community concerns. Likewise the Council considers the alternative foreshore option as being unsuitable due to its extreme proximity to residential properties. The section below sets out the Council’s key concerns relating to the alternative site options.

##### *Foreshore, off Narrow Street and near junction with Spert Street*

The Council has significant concerns about the selection of the foreshore site in this location for CSO interception. The immediately adjacent housing would be challenging in respect of providing sufficient mitigation against impact. The ambient noise in the area is likely to be very low and the need for restricted noise levels would be necessary to provide protection to adjacent residences. Working outside the Council’s normal construction working hours policy would be unlikely to receive approval.

The foreshore site is in close proximity to a number of listed buildings, which would be challenging to protect.

Construction on this site would impact on:

- The Strategic River Walkway, part of the Thames Path, which runs along the foreshore.
- Cycle routes along the foreshore, which form part of the LCN+ cycle network, and have high cycle traffic for residents commuting into London. Disruption to key cycle routes would adversely impact on initiatives to promote healthy lifestyles and sustainable travel.

The Thames is part of the Blue Ribbon network, a key policy area for the London Plan. The Blue Ribbon Network serves as a valuable series of habitats for wildlife across London. Many parts of it are semi-natural systems and in such a heavily urbanised area, they often offer a sense of nature that has been lost across much of London. Any construction on the Blue Ribbon network would need to align with the Mayor of London’s policy statement on development of the Blue Ribbon Network.

The foreshore is covered by the London biodiversity strategy. We strongly recommend that TW contacts the Port of London Authority for a copy of an Action

Plan specific to this reach of the Thames, to determine any impacts on specific wildlife communities.

### *St James's Gardens, off Butcher Row and Tunnel Approach*

The Council has great concern about the selection of St James's Gardens for CSO interception. The proximity of adjacent housing would be challenging in providing sufficient mitigation against impact. The ambient noise in the area is likely to require the need for restricted construction noise levels to provide protection to adjacent residences. Working outside the Council's normal working hours policy would be unlikely to receive approval.

The Rotherhithe Tunnel runs beside the east end of the park. This is managed by Transport for London, and they would need to be consulted on impacts from any construction work in the area. Furthermore, the tunnel is one of only 3 traffic connections across the Thames East of Tower Bridge. The Council is concerned about any flow on effects on local traffic in the area, and impacts on the local economy from disruptions to traffic flow along the tunnel.

Tower Hamlets is deficient in publicly accessible open space and the Open Space Strategy 2006 identified that the borough fell significantly short of the national standard of 2.4ha of open space per 1,000 residents. In 2006 Tower Hamlets only had 1.2ha per 1,000 residents.

The Shadwell ward within which St James's Gardens are located, has an even greater shortage of open space than the borough average making this site an important space for residents in this part of the borough. Shadwell ward is the fourth most densely populated ward in the borough with 140 residents per ha. It is also one of the more deprived wards in the borough. Especially in conjunction with the proposed use of King Edward Memorial Park, the amount of open space in this ward would be significantly reduced.

Removal of this open space could also impact on walk and cycle routes through and around the park, including the newly launched Cycle Super Highway. This would have serious implications for activities to promote active lifestyles and sustainable travel.

There is a footbridge crossing the adjoining TFL red route, which exits into the park. This is the only safe pedestrian crossing of this red route, and it connects the narrow riverside section of this ward with Limehouse and the greater transport network. The removal of access to this footbridge would have a negative impact on residents' ability to safely cross busy roads and a potential impact on commercial interactions in the area.

The park is located between two Grade II listed structures - St Katherine's Chapel and the Rotherhithe Tunnel approach. Construction methods will need to be carefully managed to protect the historic fabric of the building.

This park is in the York Square Conservation Area. The area appraisal for this Area notes that St James Gardens, especially its mature trees, provides the setting for St Katherine's Chapel. Furthermore, trees in a Conservation Area are protected.

**5. Please comment on our ideas for how a site might look after consultation (see artist's impression).**

The Council welcomes the proposal to create additional open space within an area highly deficient in public open space. We understand that the artist's impressions are indicative only. The Council wishes to be closely involved in developing the design/massing and determining the location of any permanent features on the site. Butchers Row has the potential to provide additional pedestrian and cycling links providing connectivity to and from Limehouse DLR station and welcome the indication for such infrastructure to remain in place upon project completion.

### **Part 3**

#### **1. Did you attend an exhibition?**

Yes, 19 October, John Scurr Community Centre.

#### **2. Please give us your comments about the exhibition**

The exhibition provided helpful information about the wider scheme. The animation highlighting why and how the scheme will work was informative. It was well staffed to cater for higher numbers of visitors at peak times.

#### **3. Please give us your comments about the information we have provided.**

More information about the local sites would have been helpful. Issues such as heights, design and further explanation of how construction would affect a site would have helped understanding further.

The questionnaire was very long and could feel quite onerous to many completing the form.

#### **4. Have we provided you with enough information about how we will use your comments and what happens next?**

Enough information about the next steps was provided, although could have appeared on the consultation form for those who did not attend an exhibition or look on the website.

#### **5. Please give your comments about how you would like us to consult you in the future.**

The Council would appreciate increased input into consultation planning. The venue, although close to one of the proposed sites was too far away from the site which was likely to have most interest – King Edward Memorial Park. This was highlighted by a resident attending the exhibition who lives locally to the park who felt that many people would not attend due to distance.

It would also have been helpful to understand the kind of support you intended on offering to those who do not have English as a first language, a key consideration in Tower Hamlets.

Finally prior notice of the dates that you intended to hold the exhibition may have highlighted that this would be held in the same week as the local Mayoral Elections, thereby reducing the number of Councillors who would be available to attend and respond to public enquiries or may have had an effect on the number of people who attended.

The Council would also wish to be involved in the consultation of detailed design, massing and exact location of any permanent above ground features.