Jennifer Rea
EIA co-ordinator (Central)
London Tideway Tunnels
The Point (7th floor),
37 North Wharf Road
Paddington, London, W2 1AF

My reference: **Response to the Thames Tunnel Code of Construction Practice Part A: General requirements**

Please ask for: Patricia Cuervo

23 December 2011

Dear Ms Rea,

Please see enclosed our response to the Thames Tunnel Code of Construction Practice Part A: General Requirements.

Section 3: Communications and community liaison
We welcome the provision by the contractor of community relations personnel who will be focused on engaging with the community and solving any issue and concern arising. We also welcome the provision of a telephone helpline maintained by Thames Water.

Section 4: Working Hours
We reiterate our previous comments about the importance of minimising any disruption to our residents. We still consider that 1 hour start up and close down periods at the start and end of each shift is too long as it would involve residents being disrupted for over 12 hours on a weekday and 7 hours at weekends. With regard to extensions of working hours, these should be kept to a minimum and agreed with the Local Authority well in advance. Consideration should also be given to how residents in the local area should be informed of out of hours working with a contact telephone number manned at all times when work is taking place.

Section 6: Noise and Vibration

We would like confirmation of the validity of the BS 5228:2009 and BS 5228:1997 versions in respect of s61 applications. The 2009 version is not yet authorised by the SoS to be used in fulfilling requirements of the Control of Pollution Act 1974.

In reference to working hours (section 4.2): The definition of mobilisation and maintenance periods needs to be defined as non noisy work not audible at the nearest noise sensitive premises. The request for working time for maintenance works on Sunday is not acceptable. The need for a six hour period on a Sunday indicates major maintenance works that should only be carried out in a maintenance workshop off site. Any works on a Sunday (not related to tunnel boring) shall be for emergency or safety related issues only and authorised by way of a variation to s61 by the Director of Environmental Health.

Early discussions, regarding s61 prior consents, with the contractor will establish the position on this.

Paragraph 6.3.2: The submissions of section s61 applications shall be prepared/managed by competent and suitably qualified acousticians as a corporate member of the Institute of Acoustics, experienced in the field of construction noise assessment and prediction.

Paragrah 6.4.1: BPM is to be employed at all times. Whether or not it is possible to use a certain technique of construction to minimise noise/vibration is part of the BPM assessment.

Paragraph 6.4.8 A baseline of pre-existing vibration magnitudes affecting existing sensitive receptors before works commence should be measured and recorded for comparison.

Section 6.6: see 6.3.2 above.

Section 6.5: with regard to noise and vibration monitoring, has consideration been given to the installation of real time noise/vibration monitoring that can be accessed via the Internet? It may not be necessary at Chelsea Embankment/Ranelagh Gardens site but at more sensitive sites such as Cremorne Wharf it would be a useful tool in managing construction noise/vibration.

Section 7: Air quality

Paragraph: 7.4.3: Standard dust control procedures on all sites, areas where measures will be introduced have been listed a to f. However, the measures for each of these areas should be specified; only then will it be possible to identify whether all possible mitigation measures have been considered.

Paragraph 7.5.6: Dust monitoring - It should be acknowledged that triggers for an alert system may not be visible. In this case, the activities taking place on site should be reviewed to identify potential causes and a sensitive system introduced.

The measures listed should also include an action that works should cease once a certain dust level has been breached and should not be re-commenced until the source has been identified and mitigated. We look forward to working with Thames Water to agree the locations of the automatic monitoring equipment and a specific plan on alert trigger levels and how these should be responded to as Part B of the code.

Odours

Section 7.7: Whilst it is not anticipated that the works will give rise to any significant odours, it would be helpful if the code could include some information on how they will be monitored. In addition, the appropriate measures that will be adopted, if required, to avoid the creation of a statutory nuisance should be listed.

Section 8: Water Resources and Flooding

The compliance procedure explained in paragraph 8.7.1 should also take into account early works and not just the construction period.

Section 9: Land quality

Paragraph: 9.2.1 Site assessment and remedial practice -– this paragraph should refer to Contaminated Land Report 11 rather than Contaminated Land Register 11.

Paragraph 9.2.2 (i) - Point (i) refers to the watching brief that must be maintained by 'an appropriately qualified person' throughout the investigation. We need to be clear and agree what is classed as 'appropriately qualified.'

Settlement

There is no indication of how potential settlement due to tunnel boring will be controlled or monitored. However this can be discussed for the Part B localised impacts at a meeting arranged in January 2013.

Please do not hesitate to contact my officer, Patricia Cuervo if you have any queries regarding this matter.

Yours sincerely,

Jonathan Bore
Executive Director Planning and Borough Development