

**Planning and Borough Development**

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**Executive Director Planning and Borough Development**

Mr Jonathan Bore

Clare Gibbons  
Planning Projects Manager  
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The Point (7th floor),  
37 North Wharf Road  
Paddington, London, W2 1AF

My reference: **Response to the draft Thames Tunnel Code of Construction Practice.**

Please ask for: Patricia Cuervo

27 October 2010

Please ask for: Jonathan Bore

Dear Ms Gibbons,

Please see enclosed our response to the **draft Thames Tunnel Code of Construction Practice Outline Contents.**

**The Royal Borough of Kensington and Chelsea response to the Thames Tunnel Code of Construction Practice Outline Contents**

**1. Introduction**

1.1 This consultation paper presents the structure and summary of proposed contents of the Thames Tunnel Code of Construction Practice (CoCP) and is intended for early circulation. It outlines the key issues that will be included in the code of construction. It includes information on general principles, general site operations (Part A), and site specific principles and requirements (Part B).

1.2 The objectives of the Code are:

- to set out the standards and procedures for managing the impact of site activities during the construction of the Thames Tunnel;
- to identify the main responsibilities of the Client and contractors employed during the implementation of the scheme; and,
- to assure all stakeholders that the project aims to ensure that all construction impacts will be managed appropriately.

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1.3 The developed Code will be included in the planning submissions as appropriate and will be included as requirements on the appointed contractors in the construction contract documentation.

## **2. Officer Assessment**

2.1 The code is very general although it includes a thorough list of all the potential impacts of construction. As site-specific Construction Environmental Management Plans will be produced for each site and agreed with the Council as a Planning Authority before works commence on site, we would have a further opportunity to be consulted on specific requirements for each site.

### **Section 2: General principles.**

2.2 This section covers: Environmental Principles Minimum Standards, Construction Arrangements and Management Arrangements. We agree with the Environmental Principles Minimum Standards. In terms of the Construction Agreements, it is important that the code of construction takes into account not just the impacts on the environment but also on the residents and visitors to the area. Minimising these impacts together with the disruption caused during construction will be fundamental components critical to the success of this project. We therefore agree with the references to limit adverse impacts upon local communities and the implementation of a community liaison plan, including a complaints help-line.

2.3 We are pleased to see that a construction logistics plan will be produced to manage traffic movements. We consider that the plan should not only deal with the management of the traffic but also ways of reducing it and sustainable methods of transport should be developed such as the use of the River. It is important that the adverse impacts of the construction are not just limited, but also mitigated, and we would therefore like to see the reference to mitigation of impacts under the general principles.

2.4 We are pleased to see that a series of management Plans are to be included in the hierarchy of documentation to be produced and in the Environmental Management Plan (EMP). We would like to stress the importance of the traffic Management Plan due to the potential nuisance to our residents and the Waste Management Plan to deal with waste in the most sustainable way.

### **Section 3: General Site Operations**

2.5 This section covers Construction Processes, Working Hours, Site Layouts, Emergency Planning and Response, Fire Prevention and Control, Security, Utility Works, Electromagnetic Interference, Unexploded Ordnance, Asbestos and Worker Access.

2.6 In terms of working hours we are aware that the activities intended to be carried out on a 24 hour/7 day basis will be defined in this section. The importance of minimising any disruption to our residents cannot be underestimated. We 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 on weekdays. 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.

2.7 The Site layout section is quite detailed. In terms of control with regard to access gates at the main worksites, account should be taken not only of safety issues but also on crime prevention. This could be linked to the security section.

#### **Section 4: Public Access and the Highway**

2.8 This section covers Traffic Management and Control, Lorry Management and Control and Highway Works together with Public Right of Way.

2.9 In terms of transport, more information will be required before we can usefully comment. The general headings appear to cover the key aspects. However, we would stress that issues such as the appropriate management of their traffic, the use of the river for transporting spoil, minimising the impact of development sites on the road network and ensuring safe passage for pedestrians should be covered under the headings provided. We would welcome further opportunities to provide detailed comments to secure a Construction Transport Management Plan (CTMP) at later stages of the project, prior to the submission of the planning applications. We would stress the importance of these CTMP being produced to both, TfL's and the Borough's requirements, as the two may differ.

2.10 The importance of providing safe routing for Public Rights of Way is also mentioned. This aspect is also important.

#### **Section 5: Noise and Vibration**

2.11 The main issues relating to noise and vibration have been adequately scoped. The document states that applications for section 61 consents under the Control of Pollution Act 1974 are being considered. We would like to see this as an early commitment rather than a consideration.

#### **Section 6: Air Quality and Odour**

2.12 In relation to Air Quality and Odour reference should be made the Mayor of London's Guide for Controlling Dust and Emissions from Construction and Demolition, (November 2006) which contains examples of mitigation for medium and high risk sites. We are pleased to see that dust monitoring will be undertaken at all medium to high risk sites, but seek assurance that this will be real-time PM10 monitoring and that an automatic alert will be triggered once the action level has been breached at any site and not just at a sensitive site. In addition the CoCP should contain procedures for the actions that will be taken once these levels are exceeded.

2.13 All of this information should form part of a Low Emissions Strategy which must set out how emissions of NOx and PM10 will be minimised. Please refer to the Royal Borough's Air Quality, Supplementary Planning Document (SPD) for further information.

2.14 We are concerned about potential odours during construction and note that measures to minimise these will be defined. We consider this to be important.

#### **Section 7: Water Resources**

2.15 In terms of flooding, we would like to add that the maintenance of flood barriers is important but it is also important to try to reduce flooding from any source through the measures that are available (i.e., temporary tanks, SUDs if possible).

## **Section 8: Land Quality**

2.16 The section relates to Land Contamination states. It includes arrangements for assessments and preparatory activities, alongside arrangements for unexpected contamination. In itself this is fine. We would like to make sure that the assessments proposed are the same as our requirements.

2.17 It is assumed that a desk top study, site investigation and risk assessment will already have been undertaken. The CoCP should therefore include details from the remediation strategy (if required) and set out what information will be included in a verification report, once the works are complete, and as already acknowledged, details about what will happen should additional contamination be suspected. These must be carried out in accordance with CLR 11, the Environment Agency's 'Model procedures for dealing with contaminated land'.

2.18 We consider that the CoCP should also include details about what assessments will be undertaken on material excavated that may then be re-used, be it on site or whether it will be taken off site by barge and re-used elsewhere .

## **Section 9: Waste Management and Resource Use**

2.19 Sustainable ways to transport the construction waste should be investigated and implemented where possible.

## **Section 10: Ecology**

2.20 We recommend the following additions to section 10 (underlined).

### 10 ECOLOGY (AQUATIC AND TERRESTRIAL AND NATURE CONSERVATION)

#### 10.1 Procedures

10.1.1 Detail the procedures for contractors to follow including site-specific plans where necessary. Reference the Wildlife and Countryside Act 1981 and Conservation (Natural Habitats) Regulations 1994 and Local, Regional and National Biodiversity Action Plans.

10.1.2 Detail the audit requirement to ensure contractors follow management plans.

#### 10.2 Detailed Provisions

10.2.1 The contractor will produce site specific Ecological Management Plans.

10.2.2 Define requirements/controls required by the contractor.

10.2.3 Specific provisions to be detailed include protection measures for all protected and priority (BAP) species and habitats, trees, site surveys, relocation etc.

## **Sections 11 and 12: Historic Environment, and Settlement.**

2.21 In terms of the potential impacts on historic assets, we would like to work in close partnership with Thames Water throughout all the stages of the project to reflect the importance and sensitivity of the construction sites on our built environment and heritage.

**Part B-site Specific**

2.22 This section will document individual requirements for each site.

We would like to have an active input on the development of the site specific sections of the code. Both of the proposed sites are very different and will involve different issues. We therefore believe that our local knowledge is very important to ensure that any potential impact is reduced as much as possible.

2.23 We would also like to add that the draft 'Builders' and Constructors' Code' written by the Royal Borough's Environmental Health department should also be taken into account.

2.24 We would welcome further opportunities to comment prior to the planning application stage.

Yours sincerely,

Jonathan Bore  
Executive Director