Application for Development Consent
Application Reference Number: WWO10001

Written Representation:
Chambers Wharf
Proposed Changes to Working Hours

Doc Ref: APP20
1 Proposed change to night time working at Chambers Wharf

1.1.1 The Environmental Statement (ES) submitted with the application for development consent (Doc ref: 6.2) identifies at Vol 20, Section 9 that the worst case night time noise impacts during construction are predicted to be “significant” at Luna House and Axis Court. This assessment included the proposed embedded mitigation measures, such as on-site noise enclosures. The assessment did not take into account the fact that the properties are predicted to be potentially eligible for the provision of noise insulation as detailed in the Noise insulation and temporary rehousing policy submitted with the Statement of Reasons (Doc ref: 4.1) which might ordinarily be considered to reduce the significance of the predicted effect. The reason for this is that it was considered there was no guarantee that the noise insulation would be accepted by the occupier and thus could not be relied on to reduce the predicted effect.

1.1.2 The night time noise impact on the occupiers of 8-14 Fountain Green Square from river-based construction traffic is also predicted to be “significant”. In both cases the impact is estimated to last for approximately 29 months.

1.1.3 Relevant representations, including those of the London Borough of Southwark and Save Your Riverside, raised the issue of noise impacts as a serious concern. Since the receipt of the relevant representations, we have continued to consider ways to reduce noise impacts, having regard to para. 4.9.9 of the National Policy Statement for Waste Water.

1.1.4 The purpose of this written representation is to make public our current thinking on this issue to allow stakeholders and interested parties to submit representations before we take our final decision.

1.1.5 There would be significant noise impacts at night time, arising from the use of plant associated with loading barges, such as conveyors etc, and by the movement of barges as they arrive at and leave the site berth. As set out in the ES, Vol 20, para. 3.3.60 the assessed excavated material barge size is 1,500t. The need for night time working derives from the maximum rate of excavated material to be removed from the site and the site’s available storage capacity.

1.1.6 We are now considering whether, as part of the standard operating regime, the use of larger vessels up to 5,500t instead of 1,500t could significantly reduce the need for night time vessel loading and movements. In this case night time is defined as 10pm to 8am seven days a week.

1.1.7 The use of larger vessels would increase the time available for loading by reducing lost time during vessel or barge changeovers at the berth. This additional capacity would enable excavated
material stockpiled overnight to be cleared during daytime hours along with the material produced during the day. It is likely that tunnelling rates would vary and therefore, for most periods of the construction phase, larger vessels may not be required.

1.1.8 If we are able to proceed with this proposal, then the change will be secured though an amendment to the Code of Construction Practice Part B (Doc ref: 7.19) to prevent night time loading and movement of barges/vessels. The contractor would then determine the required loading infrastructure, berthing, vessel type and number based on this requirement.

1.1.9 This restriction would reduce the ability to accommodate disruptions to river transport and there is an increased likelihood that derogations would be required to ensure that project timescales are met. This includes increased sensitivity to delays in the event that a larger vessel is unable to service the site for any reason, for example, if the Thames Barrier is closed, there are tidal restrictions, or higher than expected tunnelling rates. The derogation would either use road vehicles to remove material or temporary approval to load and move at night.

1.1.10 The deployment of larger vessels would reduce the capacity for other potential activities to take place at the wharf. For instance, it may be that the larger vessels would preclude importing materials by river. This consideration is undergoing further review.

1.1.11 We have held initial discussions with the Port of London Authority on the proposed use of 5,500t vessels and the initial indications are that the authority believes that there are no technical or navigational reasons to render the proposal unacceptable. Some limited dredging would be required at this site whereas none is proposed in the application. No dredging would be required outside the limits of land to be acquired or used.

1.1.12 We are still working through all the implications of this proposal but the initial indications are:

a. The use of larger vessels would reduce the air quality impact arising from river vessels at Chambers Wharf as larger vessels are more efficient and there would be fewer vessel movements.

b. The smaller number of vessel movements would have lower impacts on river vessel operators but due regard would also need to be given to the larger vessels’ restricted manouevrability. The Navigational Issues and Preliminary Risk Assessment for Chambers Wharf (Doc ref: 7.20.10) would also need to be updated.

c. In terms of noise and vibration, on the basis of:
   i no vessel movements or loading at night
   ii all night time movements of material from the slurry treatment plant to stockpiles to be confined to the three-sided enclosure around the material handling area
iii  vehicle moving the material to be a wheeled excavator or quieter (rather than a noisier tracked excavator) at an assumed ‘on time’ of 50 per cent
d.  There would be no significant night time effects at Chambers Wharf. Additional dredging may have noise impacts but would not be undertaken at night.
e.  The larger vessels would not be likely to alter the minor adverse effects already predicted on the historic environment. Additional dredging could have an additional adverse archaeological impact; however, mitigation measures, such as foreshore surveys and geoarchaeological sampling, are expected to mitigate this impact leading to negligible residual effects.
f.  There would be greater townscape and visual impacts during construction as a result of the larger vessels.
g.  Due to the intensification of movement of excavated material around the site during the day to accommodate the proposed restriction on night-time loading, additional significant day time effects may be likely at Luna House and Axis Court due to an increase in noise during more sensitive weekend hours ie on Saturday and Sunday, assuming 8am to 10pm.

1.1.13  We expect that the result of the ongoing work will be known in time for us to confirm our intentions following a review of responses to this written representation in December 2013. In the event that this restriction is considered appropriate, we would propose such a revision to the Code of Construction Practice and submit any information that is necessary to describe the environmental effects arising as a result of the restriction on night time working.