

**SILVERTOWN TUNNEL DCO
WRITTEN REPRESENTATION BY NATHANIEL LICHFIELD & PARTNERS
ON BEHALF OF U AND I GROUP PLC**

In September 2015, we wrote to TfL on behalf of U and I Group PLC as owners of land alongside Tunnel Avenue on Greenwich Peninsula, in response to the then-current consultation

- a) to object to some of the detail of the accommodation works as currently proposed (and lack of necessary information) but
- b) to support the general principle of the proposed tunnel provision.

In August 2016, we recorded through the Inspectorate website that

“We act for the U and I Group as long term leaseholders of Morden Wharf, alongside the southern access road to the Blackwall Tunnels. Morden wharf contains two main parcels - i. a substantial development site for mixed uses including housing within an area already identified by RB Greenwich for major development and ii. a proposed Safeguarded Wharf within a Strategic Industrial Location and to replace that wharf to be lost through the proposed development - all establishing substantial movements by vehicles, cyclists and pedestrians.

We have consulted with TfL throughout the emergence of the proposals and have made considered representations at each stage. U+I has no objection in principle to the proposed scheme. It does, however, object to the detailed arrangements proposed for accommodation works on and around Tunnel Avenue (which provides the main access to Morden Wharf).

The detailed proposals take no account of the representations made in relation to highway and cycle/pedestrian safety on Tunnel Avenue. A proposed new dual-use overbridge will disgorge pedestrians and cyclists onto a narrow pavement on the western side of Tunnel Avenue, with no provision for safe cycle movements southwards towards Morden Wharf and to new housing and cruise liner terminal further south, all of which will require the overbridge for safe connection to North Greenwich centre and Underground. The public transport provisions of the proposal remain largely unformed but the details as proposed would preclude the safe operation and stopping of bus routes along Tunnel Avenue and serving the busy western side of the Peninsula.

The limit to land take and the details currently proposed fall short of providing a safe basis for non-car modes properly to be available - 'an accident waiting to happen'. Such an approach is contrary to national and London Plan policies and alternative details could build in the solutions to the overall scheme rather than build them out.”

We have since recorded interest in the subsequent formal DCO and been given registration identification number SILV-219.

The status of the representation

U+I is the long leaseholder of a substantial area at Morden Wharf, to the west of Tunnel Avenue, and is the freeholder of a 3-storey office building at its frontage. The company has entered into a development agreement with the Morden College Trustees in order to pursue the site's development in accordance with its allocation within a Strategic Development Location in RB Greenwich's recently adopted Local Plan.

The northern part of the Morden Wharf site is likely to become a Safeguarded Wharf in accordance with the Mayor's submitted Review of such wharves across London.

U+I has recently also received planning permission for the Telegraph Works development further south, to the rear of the Alcatel-Lucent factory, for further high density residential development alongside Enderby Wharf.

Approach to representations

Overall support for tunnel provision

U+I recognises the wider benefits that the proposed scheme can bring to the Greenwich Peninsula and to East London generally. Reduced congestion, notwithstanding a charging regime, is viewed by U+I as a substantial benefit to those who will live and/or work in the locality – a major regeneration area for London.

Public safety

With the Mayor's interests in sustainability and the need to encourage journeys by public transport, by bicycle and on foot, these general congestion benefits need also to sit alongside appropriate infrastructure to encourage travel by non-car modes. Such an approach is adopted by TfL in its consultations on development schemes around London. The proposed scheme therefore needs to reflect these wider objectives within the main overall remit of easing traffic congestion on the Blackwall Tunnel Southern Approach.

The necessary changes as proposed to the local road network, such as the re-opening of the full length of Tunnel Avenue, will inevitably change local traffic movements; and will require implementation in a way that must reasonably maximise public safety on Tunnel Avenue in the face of increased heavy goods movements and increased bus frequencies.

We note that existing concerns are recorded in the consultation material. The preliminary Transport Appraisal states in paragraph 4.4.5 that the audit indicated that

- *sections of Tunnel Avenue constitute a threatening environment for pedestrians with high levels of fumes, dust, pollution, and a general lack of permeability as a result of vehicle domination – no tactile paving is provided and there are maintenance, litter, debris, surface quality issues in evidence;*

and, in respect of cycling provision, it states in paragraph 4.4.7 that

- *the current cycling facilities are of a particularly poor standard (cluttered, frequently interrupted, incorrectly signed);*

but these problems are not addressed in the scheme currently subject to examination.

New overbridge

The necessary provision of a lengthened overbridge across the main A102 is welcomed as a means of offering improved interconnection east and west of the Approach Road for pedestrians and cyclists, thereby improving access to North Greenwich underground station.

We fully support the aspirations set out in the Design and Access Statement for a new 'gateway' bridge. However, concerns remain over certainty of delivery of a high quality

design consistent with the wider area's regeneration. Good quality and safe connections are necessary at both ends.

Planning commitments context

Overall, it appears that satisfactory accommodation works are proposed to the east of the A102 but remain sadly lacking to the west. This is not acceptable in the context of:

- Mainly residential planning permissions being implemented at Lovells Wharf, Enderby Wharf, the Telegraph Works and (to the north) by Knight Dragon
- The new cruise liner terminal, which will bring thousands of tourists each year to the Peninsula
- Major existing business premises and two safeguarded wharves
- The option for further employment provision arising from the Strategic Industrial Land designation through the GLA London Plan and RBG Core Strategy
- The option for additional major development arising from the Strategic Development Area designation through the GLA London Plan and RBG Core Strategy

all of which are clear planning commitments needing to be taken into account in the formal environmental assessment within the DCO application. A plan showing the location of these commitments is attached.

It was noted that para. 5.1.39 of the PEIR indicated *inter alia* that

- a 'projects identified in the relevant development plan, recognising that much information on any relevant proposals will be limited, and
- b projects identified in other plans and programmes which set the framework for future development consents/approvals where such development is reasonably likely to come forward

were identified by PINS as requiring inclusion through the scoping process. However, Drawings 17.1 and 17.2 showed the substantial absence of such projects in practice being included in the cumulative assessment, including those on the drawings sent to TfL.

With

- the adopted London Plan and the adopted RBG Core Strategy both identifying a Strategic Development Location on land around Tunnel Avenue (together with Strategic Industrial Land and two Safeguarded Wharves) and
- the adopted Greenwich Peninsula West Masterplan SPD identifying substantial further residential development in that Strategic Development Location,

the importance of including these in the Environmental Assessment is absolutely clear and necessary.

The cumulative assessment approach therefore remains unsound.

The ongoing concerns

Whilst the new overbridge offers a good connection with improved ramps to support pedestrian and cycle connections and whilst its eastern end connects well with improved connections along Boord Street into the eastern Peninsula, the western end disgorges only onto a narrow pavement running both south and north, notwithstanding altered arrangements for the ramps themselves.

Appraisal of the consequences is made more difficult with the continuing absence of published data on traffic flows on Tunnel Avenue.

Pedestrian/cycle safety

With the increasing vehicular, pedestrian and cycle movements in the locality arising from schemes which should properly be included in the Environmental Assessment, pedestrian and cycle safety concerns themselves increase.

In summary and in respect of the pedestrian/cycle interface with moving vehicles and with no purpose-built cycle facilities on Tunnel Avenue, cyclists using the bridge and then travelling southbound on Tunnel Avenue would arrive from the shared use overbridge ramp onto a footway, then need to cross flowing northbound traffic and to enter flowing southbound traffic. A similar problem arises for cyclists from the north wishing to use the overbridge.

The temptation will therefore be for cyclists to use, in the long term, the narrow western (and only) footway on Tunnel Avenue as an unsuitably-narrow shared surface to access the numerous businesses and up to 4,000 homes in this part of the Peninsula. This would create a clear safety concern and fall well short of required TfL design standards. In some places, this width reduces to around only 1.8m.

The alternative for cyclists would be to make uncontrolled entry onto the busy carriageway of Tunnel Avenue either northbound or, worse, southbound; however, it is noted that Tunnel Avenue is to become much busier and with a high proportion of heavy vehicles travelling to/from two safeguarded wharves and other industrial premises.

Bus usage

Whilst the detailed route planning for buses is apparently still some way in the future, there should be the easy prospect of providing for a spread of north-south services along the Peninsula as a consequence of the Silvertown Tunnel scheme, rather than reinforcing the divide and creating a concentration of services on Millennium Way to the east of the A102.

With substantial new housing and employment locations committed along the full length of the western side of the Peninsula, TfL should be seeking to encourage public transport usage by offering good public transport spread including frequent and convenient services along Tunnel Avenue – with the option of two service routes there (and leaving five to the east of the A102).

It is important that this preferred public transport option is not 'planned out' through inadequate accommodation works on Tunnel Avenue.

Bus passenger safety

In respect of bus provision and in the light of the wider objective to encourage public transport usage, there should be provided sufficient and adequate bus stop facilities on Tunnel Avenue (for both southbound and northbound journeys) to serve those businesses and homes, without impinging on pedestrian and cycle routes.

The Ramboll report submitted to TfL in September 2015 therefore recommended providing appropriate means of allowing for the stopping of buses on Tunnel Avenue whilst maintaining cycle and pedestrian safety. Whilst this is important for northbound movements, for which the existing footway is too narrow, it is even more important for southbound movements for which there is no footway at all.

Occasional unavailability of the overbridge

There is also concern that the footway running northwards from the overbridge is far too narrow to carry pedestrian and cycle movements for any periods when the overbridge is necessarily closed – either for maintenance or for major repair/replacement. In such circumstances, the footway on Tunnel Avenue needs to be able to cope with the real world demands from such inevitable periods over the coming decades.

Principal Issues for Examination

We note that the Inspectorate has established a range of principal issues for its consideration and we believe – in respect of the current objection – that the relevant identifiable three overlapping areas of concern are:

7. Policy objectives
8. Redevelopment, urban renewal and other socio-economic issues
9. Transportation and traffic.

6. Policy - The Panel is interested in whether the DCO scheme is consistent with policy at all levels.

We note that is clearly not in relation to London Plan policy as Policy 6.1 requires *inter alia* that the requirement under criterion b) is to improve the capacity and accessibility of public transport, walking and cycling, which the scheme in detail clearly fails to do in respect of connectivity at Tunnel Avenue by failing to allow for appropriate access to public transport.

The Policy 6.1 also requires under criterion j) that all parts of the public transport network can be used safely and easily, which the scheme also fails to do by not providing scope for safe southbound bus stop(s) on Tunnel Avenue.

The Table 6.1 referred to in that policy also includes the need for investment supporting economic revitalisation in London's Opportunity Areas by providing new links and services, again not reflected in the DCO scheme.

Policy 6.2 requires work with strategic partners to co-ordinate measures to ensure that the transport network, now and in the future, is as safe and secure as reasonably practicable – not delivered by the DCO scheme.

Policy 6.7 indicates the Mayor will work with TfL and boroughs to implement London-wide improvements to the quality of bus, bus transit and tram services and that the Boroughs should *promote bus, bus transit and tram networks, including a) allocating road space and providing high level of priority on existing or proposed routes, b) ensuring good access to and within areas served by networks, now and in future and c) ensuring direct, secure, accessible and pleasant walking routes to stops*, none of which are met by the current DCO scheme.

Policy 6.9 on cycling includes that developments should provide *inter alia 'infrastructure that is safe, comfortable, attractive, coherent, direct and adaptable and in line with the guidance set out in the London Cycle Design Standards (or subsequent revisions)'* and that Boroughs should both *'identify, promote and facilitate the completion of relevant sections of cycle routes including ... local borough routes, in light of guidance from TfL'* and *'identify and implement safe and convenient direct cycle routes to town centres, transport nodes and other key uses such as schools'* – again which are not met by the current DCO scheme.

The supporting text goes on in para.6.34, the Mayor will seek safety improvements for cycling across the road network, including key junctions ... and the creation of cycle superhubs and cycle networks around London Underground ... stations – with the importance here of connecting the western side of the Peninsula safely to North Greenwich station.

NPPF incorporates such an approach and, in particular, paragraph 35 supports access to sustainable transport modes (e.g., buses, walking and cycling) with developments designed to *'give priority to pedestrian and cycle movements and have access to high quality public transport'* and *'minimise conflicts between traffic and cyclists or pedestrians'*, which this detail of the wider scheme wholly fails to do. TfL rightly requires such an approach by others but here has failed to do so with its own scheme.

7. Redevelopment and urban renewal – The Panel is interested in the effect of the proposed scheme on proposed redevelopments nearby.

We record the obvious observation that the south of the River Thames near the proposed tunnel is an area of intense development activity, with Peninsula Wharf delivering over **20,000** new homes and substantial job creation in the north and east of the Peninsula.

On the western side of the Peninsula and served by Tunnel Avenue, schemes under construction include Lovell's Wharf, Enderby Wharf and the Telegraph Works, with a combined capacity of **around 4,000** new homes.

This is in addition to two safeguarded wharves whose access is to be opened up for additional two-way movement along Tunnel Avenue (although there are no traffic generation estimates in the DCO material).

Additional areas remain at Morden Wharf, being within a Strategic Development Location and outside industrial protection allocations with scope for an additional 1,500 additional homes, plus jobs.

Tunnel Avenue is thus becoming a key local distributor road for which both support for public transport accessibility and for public safety considerations become essential.

However, the current design for the DCO scheme

- a) does not deal adequately with pedestrian and cycle safety in accord with policy and
- b) precludes use of the northern sections of Tunnel Avenue for public transport access to existing and proposed major new housing schemes and to ongoing substantial employment uses.

The effect of the proposed DCO scheme is thus effectively to reinforce the A102 Approach Road as a barrier to east-west movement by buses and then to remove the prospect of north-south bus accessibility along the western side of the Peninsula – adding to the need for private car journeys and/or to unsafe pedestrian and cycle journeys contrary to policy.

With the Greenwich Peninsula being one of the few key locations for major London-wide housing delivery and within an Opportunity Area in terms of London Plan policy, the effect of the current DCO scheme is to hinder rather than support public transport accessibility for these new homes and to increase dangers for pedestrians and cyclists willing to use sustainable forms of transport.

8. Transportation and traffic – The Panel enquires whether there are consequences that cannot be mitigated by traffic management, whether there are effects on public transport accessibility or services and whether there has been adequate assessment of more sustainable alternatives.

The current detailed design of the DCO scheme for Tunnel Avenue does not provide adequate width for safe use by cyclists and pedestrians. It leaves no scope for provision of bus stop(s) for southbound bus services, other than in a very dangerous and inadequate manner. It creates danger for cyclists needing to connect between the Tunnel Avenue carriageway and the new pedestrian/cycle shared surface overbridge. None of these matters can be dealt with by traffic management measures.

We have noted above that the designed absence of scope for southbound bus stop(s) on Tunnel Avenue will reduce public transport accessibility for those living and working on the western side of the Peninsula. It is clearly unsatisfactory for the eastern side of the Peninsula to be well served whilst the opportunity for a good service on the western side is effectively now being designed out – both in practical and policy terms.

An adequate assessment of more sustainable alternatives was indeed submitted to TfL as a response to consultation but is neither referred to in current EIA material nor reflected in the submitted DCO scheme. This is a failure of appreciation of the benefits of that alternative and a failure of process.

The objection

U+I therefore **objects** to the unsatisfactory nature of the accommodation works to Tunnel Avenue:

- 1 On the basis of absence of adequate assessment , with
 - a) no published traffic flow data to allow a review of the extent of additional traffic on Tunnel Avenue as a consequence of its re-opening for its full length as a two-way carriageway (normally a basic TfL requirement for scrutiny of any major scheme); such data should take proper account of the locally-increasing flows in the future base situation arising from committed plans, programmes and developments; and
 - b) no information about the increase in the HGV traffic component along Tunnel Avenue arising from the re-opening of its carriageway and the access to two GLA-safeguarded wharves and to other major businesses therefrom
- 2 The transfer of cyclists from a shared surface on the overbridge and its ramps onto only a narrow pedestrian only footway below falls short of standard TfL design requirements
- 3 The width of the footway in any event falls short of TfL standards for the committed usage type for the footway
- 4 There is neither cycleway nor bus stop provision proposed for Tunnel Avenue, contrary to adopted London Plan policy for encouraging non-car modes of travel, resulting in a disincentive for
 - a) safe cycle usage and
 - b) safe bus stopping and paved access opportunities and
 - c) route planning for buses to serve the western part of the peninsula
- 5 As a result, either the land take as currently suggested is insufficient to provide satisfactory and safe provision for non-car users of Tunnel Avenue as amended by the scheme or the design has not been amended to provide a compromise alternative.

The DCO scheme should therefore be amended at Tunnel Avenue to meet both policy requirements and practical necessities.

The requests

The scheme be amended to include:

- a) clear patterns of safe pedestrian and cycle connections between Tunnel Avenue and the new share surface overbridge
- b) provision of a safe northbound and southbound bus stop facility close to the overbridge to encourage public transport access for the new homes and jobs on the western side of the Peninsula.

Such requests are consistent with national and regional policy, with TfL standard practice for development by others and with common sense.

Without further review and amendment, the DCO scheme will bring increased scope for

- a) cyclist accidents leaving/entering Tunnel Avenue carriageway at the foot of the overbridge ramp
- b) pedestrian/cyclist accidents at the foot of the overbridge ramp
- c) pedestrian accidents for bus users seeking to reach southbound bus routes on Tunnel Avenue.

The brief report by Ramboll attached to these representations includes the principles of two options for anywhere near a satisfactory detailed arrangement.

Option 1 offers the basis for a layout which provides adequately for bus, cycle and pedestrian interconnection at the eastern end of the overbridge.

Option 2 offers a basis for a layout which provides adequately for bus and pedestrian interconnection, offering the opportunity for cyclists to use a dedicated road crossing facility to access north-to-south movements.

Whilst these add marginally to the required length for the proposed overbridge, these offer an important basis for resolving many of the safety concerns and should be part of proposed refinements of the scheme by TfL. It is noteworthy that such small details, whilst costing a barely-noticeable increase in scheme cost, add properly to its local integration and to its compliance with London Plan policy.