

SILVERTOWN TUNNEL PROPOSAL (TR010021): LOCAL IMPACT REPORT FROM LONDON BOROUGH OF REDBRIDGE

Introduction

Transport for London has applied to the Planning Inspectorate for an Order Granting Development Consent for the proposed Silvertown Tunnel.

Section 60 (3) of the Planning Act 2008 provides the mechanism for the London Borough of Redbridge (LBR) to consider the local impacts of this application upon its area, and this Local Impact Report dated 14th November 2016 outlines these accordingly.

LBR would like to state at the outset that it is supportive of the delivery of the Silvertown Tunnel scheme as currently proposed, as summarised below, and will be pleased to be a participant in the Silvertown Tunnel Implementation Group that would be established to monitor traffic impacts and make recommendations for any mitigations and for potential variations to the proposed user charges.

Project Proposals

This scheme involves the construction of a twin bore road tunnel, capable of accommodating large vehicles, providing a new connection between the A102 Blackwall Tunnel Approach on Greenwich Peninsula (in the Royal Borough of Greenwich) and the Tidal Basin roundabout junction on the A1020 Lower Lea Crossing/ Silvertown Way (in the London Borough of Newham). It also includes the introduction of free-flow user charging at both the Blackwall Tunnel (northern portal within the London Borough of Tower Hamlets) and the new Silvertown Tunnel, which is intended to play a fundamental role in managing traffic demand and supporting the financing of the construction, maintenance and operation of the Silvertown Tunnel.

Context

LBR has an interest in proposed major transport infrastructure or transport projects which would affect the wider east and south east London sub-region in which it is situated. The Silvertown Tunnel project, though over 5 miles by road from LBR, falls into this category because, principally via the A12 and A406 corridors and onward routes extending beyond LBR boundaries, it would provide another link for road vehicles travelling to and from LBR and destinations south of the River Thames. The associated changes to Blackwall Tunnel operation will also impact upon such traffic movements.

LBR therefore has an interest in the impact or potential impact through its area of changed traffic patterns and flows following implementation of the Silvertown Tunnel package of measures.

This Local Impact Report focusses upon these aspects.

Redbridge Planning Policy Framework

Relevant adopted Core Strategy (2008) and Redbridge Pre-Submission draft Local Plan (2016) policies

The following policies or statements from these documents are considered to be pertinent to the Silvertown Tunnel proposal. (*The full wording of these is provided in Appendix One*).

Please note that the Council consulted on the draft Redbridge Local Plan: Pre-Submission draft between July and September 2016. The Plan will be submitted in early 2017 and it is anticipated that the hearing sessions will take place in April/May. The Core Strategy and Borough Wide Primary Policies (2008) form the current development plan for Redbridge.

Core Strategy 2008

Spatial Vision for Redbridge

Of particular relevance within this Vision Statement are the following elements:

Communities will be strengthened and the good existing quality of life of residents further improved, while opportunities are grasped to participate in the social, environmental and economic regeneration of east London.

Transport links will improve the Borough's connection with the rest of London and the South East of England. Public transport and provision for pedestrians and cyclists will be improved to provide alternatives to the use of the private car. Traffic congestion will be minimised and jobs and housing provided in close proximity to transport nodes to reduce dependence on private motor vehicles and improve air quality.

All social and ethnic groups will participate in the prosperous economy and barriers to people's participation in economic and social life generally will be reduced by increasing the stock of affordable housing, improving transport links and providing better access for disabled people to public spaces and places.

Strategic Policies

Of particular relevance is:

Strategic Policy 6: Movement and Transport

Sets out how a transport network that supports a prosperous economy and socially cohesive community, reduces car dependence, encourages sustainable transport, improves air quality and reduces greenhouse gas contributions to climate change will be achieved through a range of actions, which includes reference to:

".. providing an efficient and effective transport network by:

Protecting the existing transport network and facilitating enhancements."

Redbridge Pre-Submission draft Local Plan 2016

LP22: Promoting Sustainable Transport

Of particular relevance within this proposed Policy in the context of delivering a more sustainable and efficient transport network that supports growth and a prosperous economy are the following elements:

Resist new development that results in an unacceptable adverse impact on traffic congestion within the Local and Strategic Road Network or public transport system unless it incorporates effective mitigation measures;

Facilitate the safe, reliable and efficient movement of freight and servicing trips to, from, within and through Redbridge to support the borough's economy, in balance with the needs of other transport users, the environment and residents' quality of life;

Implementation of this proposed Policy includes reference to *delivery of the Mayor's London Transport Strategy and London Freight Plan*; and to support for *the delivery of the Local Implementation Plan and maintenance and improvements to the regional transport infrastructure*.

Positive Local Impacts

LBR has long acknowledged the wider transport connectivity benefits that would result from an additional road crossing of the Thames being provided in east London. It has similarly long been aware of the limitations of the existing Blackwall Tunnel facility with its problems of capacity, design and congestion regularly adversely affecting traffic movements, including traffic heading to, from or through LBR, principally via the A12 or via the A406/ A13/A124.

It considers that the implementation of the Silvertown Tunnel via associated user charge payments for both it and the Blackwall Tunnel would represent a significant enhancement of key strategic transport infrastructure benefiting the wider east and south-east London sub-region.

The enhanced transport network resilience and reduced congestion and journey times arising from this package of measures is considered to increase sub-regional connectivity, improve access to growth areas, support growth in London's population and offer economic benefits by reducing business costs and improving access to jobs. LBR residents, commuters and businesses whose travels involve journeys to and from the south side of the Thames would gain such benefits accordingly. Businesses within many parts of LBR would also benefit because the accelerated journey times crossing the Thames would see an increase in the economically active population within a 45 minute road journey.

Potential Negative Local Impacts

The A12 and A406/M11 strategic routes are major east/west and north/south transport corridors through LBR carrying long distance and local traffic which already suffers from congestion, especially in peak periods. The latter routes also traverse Metropolitan Green Belt which separates the Woodford and Wanstead areas from Ilford, and parallel the River Roding which is an important ecological corridor and linear green space, forming part of the East London Green Grid. Open areas such as

these are highly valued by residents and make a major contribution to life quality within LBR.

LBR is therefore very mindful of potential traffic flow pressures (and therefore potential consequential environmental disbenefits) upon these corridors arising from the Silvertown Tunnel scheme, should the latter result in additional traffic levels or traffic reassignment such that these transport corridors or other roads within LBR encounter significant such impacts. However, these potential disbenefits have not to date emerged to an extent that causes concern.

The extensive highway modelling work undertaken by the applicant to examine predicted traffic flows and traffic reassignment effects across a very wide area arising from scheme implementation has demonstrated a range of variations in directional flow on a number of routes in LBR south of the A406/M11 junction. These changes (involving increases and decreases, dependent upon time of day) are most evident upon the A406 and A12 corridors, but overall the modelling work has concluded that there is only a negligible impact on the roads within LBR. Delay plots which show changes in delay as a result of changes in flow indicated that in 2031 any delay increases within LBR are low, amounting to only a few seconds on a per-vehicle basis, with the highest junction delay increase per-vehicle of less than 10 seconds occurring at the A406/A12 junction in the afternoon peak hour. Junction delay reductions occur at other locations within LBR. Overall, from the traffic modelling work outcomes viewed as at the submission of this document on 14th November 2016, LBR concludes that the Silvertown Tunnel scheme will not have a significant impact on highway journey times on any part of the road network within its boundaries.

LBR considers it important, however, that regard must be given to changes in actual traffic flows between now and scheme introduction and subsequently. Monitoring of traffic levels by the applicant before and after the opening of the Silvertown Tunnel is essential in order that appropriate measures be taken to manage and mitigate any negative effects that might occur as a result. Accordingly, LBR is pleased to be a participant alongside other London Boroughs in the Silvertown Tunnel Implementation Group that will be established by the applicant to monitor traffic impacts and make recommendations for any mitigations and for potential changes to the user charge.

The element of Part 6 of the Development Consent Order identifying the role of the Silvertown Tunnel Implementation Group and confirming LBR's membership of that Group is therefore considered essential.

Regarding noise impacts, LBR's boundaries lie outside the applicant's defined study area for noise assessment purposes. However, LBR notes that the applicant has indicated that all noise changes outside that area are considered to be negligible and imperceptible to the majority of the population.

Regarding air quality impacts, similarly LBR is outside the applicant's defined study area, but notes in recently published information by the applicant that changes in NO₂ throughout LBR arising from the scheme are described as negligible change

(less than 0.4µg/m³ change in concentration, and/or less than 40 µg/m³ total concentration).

A number of the above aspects in the “Positive Local Impacts” and “Potential Negative Impacts” sections are reflected in the “Statement of Common Ground” (Applicant’s reference: SOCG014) agreed between LBR and Transport for London.

Neutral Local Impacts

Though not an impact occurring within LBR itself, LBR residents and businesses using the Silvertown and Blackwall Tunnels would incur the new costs of tunnel user charges being applied but the benefit from the improved wider strategic road network resilience and reliability and reduced journey times offers the opportunity to perceive the charging implementation for LBR’s population and businesses in a neutral context.

Additional comments

Mindful of the increasing pressures upon the wider east and south east London sub-regional transport network arising from general population growth, LBR has expressed the view that, once surplus user-charge revenue emerges after building and maintenance charges have been taken into account, it considers that use by the applicant of such revenue should be concentrated upon delivering other transport improvements within that sub-region in view of such pressures. LBR residents and businesses making journeys within the sub-region would hopefully benefit from such investment.

Place Directorate

London Borough of Redbridge

14th November 2016

APPENDIX ONE

Relevant statements/ policies in the Core Strategy 2008

Spatial Vision for Redbridge

Over the next 10 years and beyond, all agencies will work to ensure that Redbridge will become a better place in which to live and its ambitions are realised.

Communities will be strengthened and the good existing quality of life of residents further improved, while opportunities are grasped to participate in the social, environmental and economic regeneration of east London.

The Borough will exhibit a sustainable pattern of development which minimises its contribution and vulnerability to climate change. Carbon Dioxide emissions will be reduced by locating development so as to decrease the need to travel, promoting alternatives to the use of private motor vehicles and by designing buildings to reduce energy demand. Renewable energy will play a growing role in meeting that demand. The pattern of development and the built form of Redbridge will reflect best practice approaches to reducing the Borough's vulnerability to climate change.

Ilford Town Centre will strengthen its role as a prosperous Metropolitan Centre, providing the full range of commercial and retailing facilities to Borough residents, as well as becoming a leading location for businesses in London. A major increase in residential population will occur in Ilford and some other town centres and careful attention will be paid to match this with delivery of physical and social infrastructure and improved transport and access.

The economic viability of the smaller district and local centres will be promoted to provide for the immediate needs of the local population. Focussed planning and regeneration efforts will be applied to some of these centres.

Transport links will improve the Borough's connection with the rest of London and the South East of England. Public transport and provision for pedestrians and cyclists will be improved to provide alternatives to the use of the private car. Traffic congestion will be minimised and jobs and housing provided in close proximity to transport nodes to reduce dependence on private motor vehicles and improve air quality.

New housing will be provided to meet the needs of a growing local population and to replace existing accommodation of unacceptable quality. New health, education and other community facilities and services will also be provided in appropriate locations to keep pace with this growth and demographic change and to address existing poorly serviced areas. A concerted effort will be made to combat litter and to create a clean public realm.

All social and ethnic groups will participate in the prosperous economy and barriers to people's participation in economic and social life generally will be reduced by increasing the stock of affordable housing, improving transport links and providing better access for disabled people to public spaces and places.

Initiatives such as the Redbridge Safer Communities Partnership and the Youth Offending Team will be supported and relationships with the Police Service strengthened to reduce crime and help Redbridge become a safer place.

The Green Belt and other areas of open space will be maintained and the Borough's natural environment will be protected and improved. New buildings will demonstrate a high quality of design and existing historic buildings and areas of architectural distinction will be protected. The quality of residential areas will be maintained and where appropriate, enhanced.

Strategic Policy 6: Movement and Transport

A transport network that supports a prosperous economy and socially cohesive community, reduces car dependence, encourages sustainable transport, improves air quality and reduces greenhouse gas contributions to climate change will be achieved through:

- (a) Reducing the need to travel, by locating new development including housing, retail, commercial, cultural, health, leisure and community facilities within the hierarchy of town centres and other locations in accordance with Strategic Policy 1.
- (b) Promoting walking, cycling and use of public transport by:
 - (i) Locating new development within close proximity to public transport nodes.
 - (ii) Integrating road, rail, bus, cycling and pedestrian links in accordance with the Local Implementation Plan prepared for the Borough, and the Strategic Road Network, i.e. Trunk Road and motorway Network.
 - (iii) Providing sheltered interchange facilities between different modes of transport.
 - (iv) Requiring secure, accessible and sheltered cycle parking in new developments.
- (c) Further reducing the need to travel and providing an efficient and effective transport network by:
 - (i) Protecting the existing transport network and facilitating enhancements.
 - (ii) Ensuring a clear hierarchy of roads that calms traffic in residential areas.
 - (iii) Integrating with the Strategic Road Network (i.e. Trunk Road and Motorway Network).
 - (iv) Assessing the impact of development proposals on the transport network and requiring the preparation of Green Travel Plans on all major developments.
 - (v) Requiring new developments to provide safe and functional off-street car parking spaces and adequate access to such parking areas from the public highway.

Redbridge Pre-Submission draft Local Plan 2016

The Vision set out in the draft Pre-Submission Local Plan up to 2030 is as follows:

Managing Growth and Investment

Directing growth to the borough's Investment and Growth Areas of Ilford, the Crossrail Corridor, Gants Hill, South Woodford and Barkingside will deliver successful thriving places, energy efficient housing, a dynamic economy and community services. Accelerated housing delivery as part of the Ilford Housing Zone and the arrival of Crossrail will help promote Redbridge as an attractive, well connected location in London.

Residents will share in the new social and community infrastructure, access to a range of housing types, new schools at Oakfield and Goodmayes, improved health and well-being and quality of life, improvements to open spaces, as well as new

employment opportunities, ensuring that the positive benefits of the regeneration and investment reach all residents of the borough. Redbridge will take advantage of the opportunities provided by its excellent transport linkages to central London.

Economic Vitality and Prosperity for All

Redbridge's strategic position in the London-Stansted-Cambridge and Thames Gateway Corridors will enhance the competitiveness of the borough, bringing growth and prosperity to its businesses and people. Redbridge will continue to support businesses to thrive, promote innovation and enterprise.

Intensification of the borough's employment areas and town centres will attract regional, national and international investors across all sectors to successfully deliver new jobs, assisting in securing the provision of employment training opportunities for local residents. The Council will continue to grow the professional and business services, and digital and creative sectors, enabling them to find a stimulating and attractive home in Redbridge.

Connectivity

The arrival of Crossrail in 2019 will enable significant development and regeneration within Ilford and the Crossrail Corridor, resulting in huge transformation for the borough. This significantly improved connectivity and accessibility to Central London will provide an attractive proposition to investors, creating value and acting as a catalyst for further intensification of Ilford and the surrounding areas.

An improved network of walking and cycling routes will benefit residents, businesses and visitors.

Celebrating Open Spaces and Enhancing Redbridge's Historic Assets

Promotion of high quality developments that enrich the borough's heritage and character. The uniqueness and distinctiveness of the borough's varied neighbourhoods and conservation areas such as Wanstead, Snaresbrook, Aldersbrook, Woodford Green and Woodford Bridge will capture the essence of Redbridge as a place to live, work and visit.

Redbridge's renowned and highly valued open spaces and natural areas such as Epping Forest and Hainault Forest Country Park will be protected. Hainault Forest Country Park will be made more accessible by providing better facilities to promote their use to encourage access to nature.

Redbridge will be an exemplar borough of how joined-up approaches to regeneration and investment can maximise opportunities to deliver a range of new housing, jobs and community infrastructure for local people.

LP22: Promoting Sustainable Transport

1 The Council will work with partners to support the delivery of the Mayor's Transport Strategy, London Freight Plan and Local Implementation Plan (LIP). To deliver a more sustainable and efficient transport network that supports growth and a prosperous economy, reduces car dependency, encourages sustainable forms of transport, improves air quality and reduces greenhouse gas emissions it will:

- (a) Direct new development which generates high transport demands to highly accessible locations such as the Investment and Growth Areas, town centres and transport corridors;
- (b) Support transport projects that improve the usage, reliability, quality, safety and integration with other transport modes of the public transport network, particularly where it improves the accessibility and connectivity to Investment and Growth Areas;
- (c) Support and facilitate the delivery of Crossrail by resisting development in safeguarded land and delivering station and public realm improvements at Ilford, Seven Kings, Goodmayes, Chadwell Heath;
- (d) Support improvements to Central Line stations including lifts to platforms at Newbury Park and level access improvements at all other stations;
- (e) Actively encourage walking and cycling providing an attractive public realm, safe, convenient and accessible cycle and footpath networks, through Investment and Growth Areas and that connect to the sub-regional network;
- (f) Working in partnership with TfL and bus service providers to increase the number of routes in the borough, improving the frequency and efficiency of the bus network and ensure integration of night bus services with all night Underground services;
- (g) Require major development to provide a Transport Impact Assessment to inform the design process, evaluate the impact of the development on the existing transport network, and provide mitigation measures to alleviate any adverse effects;
 - (h) Require major development to provide Green Travel Plans to demonstrate how the future users of developments will be less reliant on private motor vehicles, and promote sustainable forms of transport such as walking and cycling;
 - (i) Resist new development that results in an unacceptable adverse impact on traffic congestion within the Local and Strategic Road Network or public transport system unless it incorporates effective mitigation measures;
 - (j) Facilitate the safe, reliable and efficient movement of freight and servicing trips to, from, within and through Redbridge to support the borough's economy, in balance with the needs of other transport users, the environment and residents' quality of life;
 - (k) Require new development to provide a Service Management Plan to ensure that development can be adequately serviced within the site, to encourage shared servicing arrangements and timing of deliveries; and

(l) Require major development to provide a Construction Management Plan to particularly demonstrate how it will manage trips generated through its construction phase.

Implementation

- 1 Delivery of the Mayor's London Transport Strategy and London Freight Plan;
- 2 Support the delivery of the Local Implementation Plan and maintenance and improvements to the regional transport infrastructure; and
- 3 The Council will seek to implement the adopted Cycling Strategy in order to achieve a comprehensive network of safe and attractive cycling routes throughout the borough and connected to the wider area and strategic routes.