

# **Development Consent Order Application No. TR010021 Silvertown Tunnel**

## **London Borough of Bexley – Written Representation**

### **1. Issues Raised in the Council’s Relevant Representation**

#### **Traffic Monitoring and Mitigation**

- 1.1 The Council’s Relevant Representation, submitted in August 2016, covers concerns about the extent of the proposed monitoring strategy, the fact that the suggested list of mitigation should not be regarded as being exhaustive and the need for agreed triggers for establishing the need for mitigation in line with the proposed red-amber-green (RAG) rating.
- 1.2 These issues have, to a large extent, been addressed through the details agreed in the Bexley/TfL Statement of Common Ground (SoCG). Furthermore, the issues regarding the extent of monitoring and the identification of mitigation are expected to be addressed in revised versions of the applicant’s Monitoring Strategy and Traffic Impacts Mitigation Strategy to be submitted to the Examining Authority (ExA). The Council looks forward to reviewing these revised documents once they have been submitted to the ExA and make any further representation as necessary.

### **2. Issues Raised by the Revised Documentation**

- 2.1 Since the submission of the Council’s Relevant Representation the applicant has submitted revised documentation and Council officers have reviewed the additional documents published on the Inspectorate’s website on 5 October 2016.
- 2.2 The document of particular interest to the Council is the Update Report dated October 2016 and, particularly Section 2 of that report, entitled “Mayoral Review”.

#### **Traffic Modelling and Assessments**

- 2.3 The Review Announcement included a new pedestrian and cyclist crossing between Rotherhithe and Canary Wharf, further assessment of a North Greenwich to the Isle of Dogs ferry, a new DLR crossing at Gallions Reach and a further look at the case for an Overground extension from Barking Riverside to Abbey Wood.
- 2.4 However, it appears that, during the ten year vision, there may be no further development of the previously proposed schemes for road crossings at Gallions Reach and Belvedere, or any scheme development work would not be a priority. This causes the Council concerns in the context of the importance of such road crossings, especially the crossing at Belvedere, in enabling the delivery of planned growth in the Borough.
- 2.5 The Council acknowledges that the Silvertown Tunnel traffic modelling did not assume the Gallions Reach and Belvedere road crossings would be in place and the results indicated only minor increases in traffic along the A2 corridor through the Borough. However, the information provided by TfL for the most recent consultation on these two crossings did give the Council the comfort of knowing that the provision of the Gallions Reach and Belvedere road crossings, which could have been in place by 2025, would have removed significant levels of traffic from the A2 corridor and other key routes in the Borough.

- 2.6 Hence, if the modelling for the Silvertown Tunnel, including the impact of user charging, did result in underestimating traffic impact on the Borough, it would have been likely that the impact would have been mitigated by the opening of the other two crossings. However, this clearly may no longer be the case.
- 2.7 Consequently, it is even more crucial now that the modelling and assessment work to be undertaken nearer to the opening date utilises the most up to date details on traffic flows, economic trends, committed development and anticipated growth, to fully identify the necessary mitigation.

#### Benefits for Local Residents

- 2.8 The Council supports the Mayor's view that TfL should explore the provision of further benefits for local residents who use the tunnel and looks forward to reviewing the further update on this to be submitted to the ExA and make any further representation as necessary.

#### User Charging

- 2.9 It is noted that, in his river crossings review announcement, The Mayor acknowledges that there are fundamental issues caused by poor cross-river connectivity existing in east London and that this creates poor job accessibility, restricted mode choice, long and indirect journeys, severe congestion and lack of resilience of the road network. This view echoes those set out in the Mayor's Transport Strategy and the more recent documents, Connecting the Capital (December 2015) and City in the East (October 2016) both of which include the road crossings at Gallions Reach and Belvedere.
- 2.10 In the Council's response of November 2015 to the most recent formal Silvertown consultation the Council stated that:
- With reference to the preliminary Charging Report, it states that after the construction costs have been recouped the charges will also be used to "help fund further enhancements to transport in London". The Council strongly believes that this money should firstly be ring-fenced to help finance the costs of constructing a Belvedere Crossing and, following that, be ring-fenced for other transport infrastructure specifically in east and south east London.*
- 2.11 In light of the Mayor's announcement, the Council believes there needs to continue to be a commitment by the GLA to invest in further river crossings in east and south east London, especially a road crossing at Belvedere, or at least a commitment to use the surplus collected user charges, once the scheme construction and operating costs have been recovered, for transport infrastructure in this area. Currently, this is an item indicated within the SoCG between the Council and TfL as not being agreed.

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## **London Borough of Bexley – Comments on Revised Documents**

### 1. Background

1.1 Council officers have reviewed the additional documents published on the Inspectorate's website on 5 October 2016.

1.2 The document of particular interest to the Council is the Update Report dated October 2016 to which the following comments relate.

### 2. Comments

2.1 With regards to Section 2 of the report entitled "Mayoral Review" the Council makes the following comments.

- It is noted that The Mayor acknowledges that there are fundamental issues caused by poor cross-river connectivity existing in east London and that this creates poor job accessibility, restricted mode choice, long and indirect journeys, severe congestion and lack of resilience of the road network
- The Review Announcement included a new pedestrian and cyclist crossing between Rotherhithe and Canary Wharf, further assessment of a North Greenwich to the Isle of Dogs ferry, a new DLR crossing at Gallions Reach and a further look at the case for an Overground extension from Barking Riverside to Abbey Wood.
- However, it appears that, during this the ten year vision, there will be no further development of the previously proposed schemes for road crossings at Gallions Reach and Belvedere, or any scheme development work would not be a priority. This causes the Council concerns in the context of the importance of such road crossings, especially the crossing at Belvedere, in enabling the delivery of planned growth in the Borough.
- The Council acknowledges that the Silvertown Tunnel traffic modelling did not assume the Gallions Reach and Belvedere road crossings would be in place and the results indicated only minor increases in traffic along the A2 corridor through the Borough. However, the information provided by TfL for the most recent consultation on the these two crossings did give the Council the comfort of knowing that the provision of the Gallions Reach and Belvedere road crossings, which could have been in place by 2025, would have removed significant levels of traffic from the A2 corridor and other key routes in the Borough. Hence, if the modelling for the Silvertown Tunnel, including the impact of user charging, did result in underestimating traffic impact on the Borough, it would have been likely that the impact would be mitigated by the opening of the other two crossings. However, this clearly may no longer be the case.
- The Council supports an increase in the proportion of construction material to be carried by river transport from 50% to 55%

- The Council supports the Mayor's view that TfL should explore the provision of further benefits for local residents who use the tunnel and looks forward to reviewing the further update on this to be submitted to the ExA

2.2 With regards to Section 6 of the report entitled "Monitoring and Mitigation of Traffic Impacts" the Council makes the following comments:

- The Council notes that TfL are developing a revised Monitoring Strategy and that it will now include the entire A2 corridor through the Borough. It is also noted that TfL are developing triggers for identifying necessary mitigation and this will result in a revised version of the Traffic Impacts Mitigation Strategy being issued. The Council looks forward to reviewing these revised documents when they have been submitted to the ExA

D. Freestone  
London Borough of Bexley  
14 November 2016