

		Is the use of 2021 as the base year sufficiently robust to provide air quality modelling data for the whole of the operational phase, given the stated life of the scheme being 120 years and, if the Order is made, Silvertown tunnel is not proposed to be operational until 2023?	2021 is considered acceptable by RBG
AQ2	Applicant, GLA, London Borough of Newham, Royal Borough of Greenwich, London Borough of Tower Hamlets and other IPs with an interest in air quality	<p>The ES, in table 6.1 (page 6-11) [APP-031] explains that the Applicant has not carried out an assessment of the proposed development in terms of whether it is "air quality neutral". This term is derived from the Mayor's Air Quality Policy</p> <p>(a) Please can the Applicant provide a copy of the following ES references [APP-031], Mayor's Air Quality Strategy, Greater London Authority (Ref 6.13) and GLA Air Quality Neutral Planning Support, Air Quality Consultants Ltd, 2013 (Ref 6.14) to the Examination as PDFs?</p> <p>(b) Please can the Applicant explain why it has not provided an assessment of the scheme in terms of whether it is "air quality neutral"?</p> <p>(c) Please can GLA and the Local Authorities confirm that the assessment of air quality impacts undertaken by the Applicant is sufficiently robust in the absence of this information?</p> <p>Please can the GLA and the Local Authorities confirm whether these documents remain extant and whether there are any other London based air quality policy documents (apart from the London Plan and their own Unitary Plans) that are relevant to the Examination</p>	<p>RBG are unable to confirm that the impacts are robust if the development is required to be air quality neutral. The 'red line' for the scheme only includes the tunnel itself - not the existing Blackwall Tunnel. TfL forecast overall air quality improvements for the scheme as a whole. Clarification over the inclusion of projected improvements to air quality in Tower Hamlets due to projected traffic reductions at the existing tunnel (which is outside the red line) would be sought. In addition benefits and disbenefits are not equal scheme wide. If the AC Model is accurate (and this is still being questioned) RBG will probably not be significantly affected). Newham on the other hand has likely to have significant disbenefits. No air quality mitigation for Nitrogen Dioxide is proposed, therefore questioning the role and application of the London Wide Air Quality Neutral Strategy, irrespective of the questions that have been raised in respect of the quality of traffic forecasts that have been used to inform the air quality dispersion modelling process and the status of major schemes within environmental appraisal.</p> <p>The Mayor of London's emerging Air Quality consultations and their subsequent results, whilst not policy documents, indicate the direction of travel of the GLA and Mayor Khan</p>
AQ4	Local Planning Authorities	<p>Paragraph 6.3.40 of the ES [APP-031] states that "In order to undertake the [air quality] modelling, detailed traffic data was obtained for the Base Year, Reference Case and Assessed Case".</p> <p>Do the relevant highway/planning authorities agree to the approach taken by the Applicant in the ES in basing the air quality modelling work on these traffic data sets?</p>	They modelling follows national guidelines - it's the input data to the model which is key, and the Assessed Case is still not agreed by the Host Boroughs. The use of the model as the base line for AQ models is acceptable, however this is caveated on the acceptability of the traffic model for the Assessed Case outputs, which are not yet agreed.
AQ8	London Borough of Newham, Royal Borough of Greenwich, London Borough of Tower Hamlets	<p>(a) Are the LPAs satisfied with the locations chosen for the identification of sensitive receptors? If not, why not?</p> <p>(b) Are the LPAs satisfied with the methodology used for the assessment of air quality? If not, why not?</p> <p>(c) Are the LPAs satisfied with the Applicant's conclusions in relation to the predicted potential impacts in relation to air quality at or near sensitive receptors? If not, why not?</p> <p>(d) Are the LPAs satisfied with the Applicant's conclusions in relation to the predicted potential impacts in relation to air quality impacts in relation to sensitive receptors? If not, why not?</p>	<p>The methodology is satisfactory, but caveated inasmuch as it is based on TfL's (non agreed) Assessed Case model Outputs</p> <p>As above</p> <p>As above</p> <p>As above</p>
AQ9	London Borough of Newham, Royal Borough of Greenwich, London Borough of Tower Hamlets, No to Silvertown, Public Health England (PHE) and other IPs interested in air quality matters	Are the LPAs, No to Silvertown, PHE and other IPs (who have responded on air quality matters) satisfied with the mitigation proposed by the Applicant in relation to locations and sensitive receptors where there would be a significant impact in terms of predicted air quality changes arising from the development? If not, why not?	If TfL's traffic forecasts were accurate, there would be limited impacts in RBG so mitigation would not be an issue in this case, however the Assessed Case is not agreed, so safeguarding in terms of the monitoring and mitigation need to be defined within the DCO. Additionally a committed sum - in the form of a Community Fund for unforeseen circumstances would be an acceptable way of addressing this.
AQ14	Applicant, London Borough of Newham, Royal Borough of Greenwich, London Borough of Tower Hamlets	Would the proposed development create any hindrances to the LPAs achieving their targets in relation to demonstrating best efforts in achieving Air Quality Standards objectives?	If TfL's traffic forecasts are accepted there would be limited impact on meeting air quality objectives. However the compressed peaks, or if demand exceeded TfL's forecasts would lead to issue on the overcrowding of the local road network as. Congestion at key junctions that result from this would have an impact. This is detailed in RBG's Written Representation and Local Impact Assessment. This response should however be given further consideration in light of Mr Justice Garnham's recent findings.
AQ15	Applicant, London Borough of Newham, Royal Borough of Greenwich, London Borough of Tower Hamlets and other IPs who have an interest in air quality matters	<p>(a) The ExA requests the Applicant, LPAs and other IPs (who have included representations about air quality in their RRs) to confirm that they are satisfied that the proposed development would not lead to a significant air quality impact? If not, why not?</p> <p>(b) Are the LPAs who would host the proposed development, as well as the LAs in the near vicinity of the scheme, satisfied that the proposed development would not lead to a deterioration in air quality in a zone/agglomeration (as defined in NN-NPS paragraph 5.13)? If not, why not?</p> <p>(c) Do the LPAs consider that the proposed development would affect their ability, in air quality non-compliant areas, to achieve compliance within the most recent timescales reported to the European Commission?</p> <p>(d) Do the LPAs consider that the mitigation measures proposed would ensure that the net impact of the proposed development would not delay the point at which a zone would meet compliance timescales? Do the LPAs consider that the proposed development conforms to their local air quality action plans?</p>	<p>See AQ14</p> <p>See AQ 14</p> <p>See AQ14</p> <p>See AQ14</p>

NV4	London Borough of Newham, Royal Borough of Greenwich and London Borough of Tower Hamlets	Are the LPAs that would host the proposed development satisfied that the noise impacts arising from both the construction phase and operational phase have been assessed in accordance with the correct standards?	<p>The detail set out in section 5 appears to incorporate the latest London and National best practice and policy guidance for the control of dust and odour. It deals with maintenance and operational issues, waste and earthworks movement, track-out effects and monitoring.</p> <p>Specifically reference is made to,</p> <ul style="list-style-type: none"> · The Greater London Authority's Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance. · Directive 97/68/EC of the European Parliament and of the Council, 1997 and its subsequent amendments · Greater London Authority (2014) The Control of Dust and Emissions during Construction and Demolition. · The Institute of Air Quality Management (IAQM) guidance and Mayor's Dust and Emissions Supplementary Planning Guidance · Institute of Air Quality Management (2015) Land-Use Planning & Development Control: Planning For Air Quality <p>For the control of noise through the construction period, the Code of Construction Practice states that 'Best Practicable Means' will be employed (Control of Pollution Act, 1974) and that BSS228 will be used to assess impact in the night, with monitoring and agreement being with the Planning Authority.</p> <p>These measures are industry practice.</p> <p>However, given the lack of impact that is reported in the Environmental Statement, arising from both the construction and operational phases of the scheme, it is essential that local Environmental Health Officers manage this process, including adherence to an agreed Noise and Vibration Management Plan, where monitoring and rapid response to exceedances will be required.</p>
NV5	London Borough of Newham, Royal Borough of Greenwich and London Borough of Tower Hamlets	<p>The ES [APP-031], in table 14-4 describes the pre-application discussions that took place between the Applicant and the host boroughs in relation to noise and vibration assessment.</p> <p>Are the LPAs satisfied with the locations chosen by the Applicant for assessment as noise sensitive receptors?</p>	<p>Yes</p> <p>Yes</p>
NV10	London Borough of Newham, Royal Borough of Greenwich and London Borough of Tower Hamlets	<p>(a) Do the LPAs consider that the proposed hours of work for all non 24/7 construction activities should be controlled through a requirement within the dDCO? If so, please indicate.</p> <p>(b) The CoCP [APP-092] in section 2.3 states that non tunnel construction works would be 08:00 to 18:00 Monday to Friday and 08:00 to 14:00 on Saturdays, with up to an hour either side of these times for start-up and close-down of activities. Additionally some activities may take place outside these core hours, in which case they would be subject to agreement with the local Environmental Health Officers. Are the LPAs satisfied with these timings for all non 24 hour activities?</p>	<p>yes</p> <p>A Saturday finishing time of 14.00 is non compliant with RBG policy - which has a standard 13.00 finish We would want the developer to specify the works that are to be carried out in the one-hour period or make a declaration that the works should be inaudible at the nearest noise-sensitive premises.</p>
NV16	London Borough of Newham, Royal Borough of Greenwich and London Borough of Tower Hamlets	<p>The ES tables 14-15 and 14-18 [APP-031] relate to tunnelling noise and vibration. Table 14-15 is based on "professional judgement" and table 14-18 is based on "professional judgement and input from HS2 Information Paper E23".</p> <p>Please can the LAs provide their views on the acceptability (or otherwise) of using "professional judgement" in these tables in ES Chapter 14?</p>	<p>Whilst descriptive criteria in the table is subjective, tunnelling vibration is unlikely to significantly impact RBG properties therefore there is not a proposal to challenge this</p>
NV17	London Borough of Newham, Royal Borough of Greenwich and London Borough of Tower Hamlets	<p>A number of limitations and assumptions are presented in paragraph 14.3.102 - 14.3.105 of the ES (and in table 14-22) [APP-031].</p> <p>Please can LAs comment on the acceptability of an assumed 80% "on-time" being described as "conservative" in relation to construction plant noise?</p>	<p>This is acceptable</p>
NV19	London Borough of Newham, Royal Borough of Greenwich and London Borough of Tower Hamlets and other IPs with an interest in lorry routing	<p>(a) Are the LPAs satisfied with the Applicant's proposed arrangements for HGV routing during construction, should the dDCO be made, whereby the CTMP is a requirement of the CoCP (through Requirement 5)?</p> <p>(b) Is there the possibility that significant deviations from the agreed/assessed lorry routes would lead to noise and air emissions which are outside those assessed in the ES?</p>	<p>Yes, RBG would wish to see the routes certified by the DCO - additionally the proposed short haul route and use of Brewery Wharf is not considered acceptable, and this is detailed in the Written Representation</p> <p>Yes, as detailed in the Written Representation, the possibility of HGVs routing by local roads to avoid delays on the A102 is of great concern for the Borough</p>
NV28	Applicant, LPAs, Public Health England and other Ips	<p>NPPF Paragraph 123 requires planning policies and decisions to aim to avoid noise from giving significant adverse impacts on health and quality of life as a result of new development.</p> <p>(a) Please can the Applicant explain how the proposed development would meet this aspect of the NPPF?</p>	<p>Silvertown tunnel development - fulfilment of National Planning Policy Framework (NPPF) paragraph 123 in respect to noise pollution and health</p> <p>(A) There is a significant evidence base for the risks to population health from road transport noise, including on sleep disturbance, cardiovascular disease, elevated hormone levels, psychological problems and even premature death. It is also clear that the impacts are disproportionately felt by protected equality groups and with an associated risk to increase health inequalities, e.g.: Children and young people - studies suggests risks include cognitive impairment, worsened behaviour and diminished quality of life and poorer educational attainment and people with existing mental or physical health problems - they are disproportionately sensitive to traffic noise. (Ref: Haines M, 1997 Environmental noise and health: a review of non-auditory effects. In: IEH report on the non-auditory effects of noise. Leicester: Institute for Environment and Health).</p> <p>Greenwich residents are already exposed to daily road noise levels above the lower EU benchmark for excess exposure. Any potential increased exposure for residents can be expected to have significant deleterious impacts on health and health inequalities of the impacted residents. Royal Greenwich is already one of the most deprived boroughs in London and pollution impacts are disproportionately felt in deprived communities.</p> <p>Reviewing the proposal and associated noise modelling from TIL for the Silvertown Tunnel reiterates RBG significant concern regarding the validity of the traffic modelling, specifically the suggestion that there will be no net increase in traffic and therefore traffic noise. This is particularly pertinent with respect to the likely increase in HGVs and buses using Silvertown than is possible through Blackwall. Both of which are noisier vehicle types than cars including with respect to tyre road interaction. There is further ongoing concern about displacement of vehicle traffic and congestion with associated vehicle noise as a result of different routes used to access Silvertown, Driver choice about which route to use in the tolled Crossings and predicted change in traffic flow.</p>

			<p>International evidence highlights that it is a false hypothesis that increasing road traffic capacity in urban areas reduces congestion and that the reality is increased traffic due to previously suppressed demand and generating new demand. (Litman, T. (2015) Generated Traffic and Induced Travel: Implications for Transport Planning, Victoria Policy Institute). A close to home case study of this phenomena is the 1966 opening of the second Blackwell Tunnel bore, which lead to a greater than 100% increase in traffic. (Greater London Council (1969) Research Memorandum No.185). (It should be noted that these points were also made in November 2015 in a submission by Sustrans to TfL - http://www.sustrans.org.uk/sites/default/files/images/files/1115_Silvertown%20Tunnel%20scheme_Sustrans%20Response.pdf)</p> <p>Vehicle noise is the consequence of a number of factors, primarily components within the vehicles (e.g. engines and brakes) and interaction between the tyres with the road. In vehicles travelling over 55kph (which will be the case for traffic approaching the Silvertown tunnel), the noise is predominantly from the tyre-road interaction. Although technological advances over the last two decades have reduced noise from car components, there has been negligible improvements in cutting tyre noise (Transport and Health Study Group, 2011 Health on the Move 2. Ch.6 http://www.transportandhealth.org.uk/) and this is likely to persist for the foreseeable future. Again the issue is more significant for larger heavier vehicles.</p> <p>In this instance the relevant sections of NPPF paragraph 123:</p> <ul style="list-style-type: none"> · avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; · mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions <p>(B) At present it is not possible to comment with confidence on whether the applicant has fulfilled these requirements due to the concerns regarding the validity of the traffic projections. The lack of an accurate picture of the quantum of the associated traffic noise makes it impossible to realistically consider the risks to health and the likely success of any mitigation steps in the short, medium and long terms. RBG would like to be reassured that the noise monitoring at the Silvertown Tunnel southern approach road is adequately covered. NMLB is likely to be significantly impacted by noise from the existing approach road. The masterplan for the area includes housing from first floor level on the northern side of the approach road and will also have housing on the south side of the approach road close to the tunnel. RBG would like noise monitoring to reflect the significant changes in noise levels where the new southern approach road will be built. The exact location of any additional monitoring will depend on where the portal is.</p>
HT1	Applicant, Historic England, Royal Borough of Greenwich and London Borough of Newham	<p>dDCO Requirement 5 states that a Written Scheme of Investigation (WSI) is required as part of the CoCP, prior to commencement. As currently drafted, this would be produced in consultation with Historic England.</p> <p>Historic England has requested to approve/discharge the WSI, not just to be a consultee.</p> <p>Please can the relevant LPAs, Historic England and the Applicant provide their views on the appropriate approval body for the WSI and how this is to be secured in the dDCO, bearing in mind that the current definition of "commencement" would authorise archaeological investigations in advance of approval of the CoCP?</p>	<p>RBG agrees that HE should approve/discharge this rather than only being consulted during the preparation. The authorised development would fall within a defined Area of Archaeological Potential in terms of Policy DH(m) of our Core Strategy as shown on Figure 4 on pg. 113. We would normally require any necessary preliminary archeological reports and works to be approved by ourselves. As we have no archeological expertise we would defer to the views of EH.</p>
HT11	London Borough of Newham, Royal Borough of Greenwich and London Borough of Tower Hamlets	Do the LAs agree with the Applicant's assessment of impacts from the proposed development upon townscape as "slight" and therefore not significant?	Yes
HT12	Applicant & IPs	Is there any evidence which indicates that if the proposed development was constructed and operational, there would be a risk to the World Heritage Site at Greenwich from traffic congestion?	This is dependent on the ability to manage traffic and ensuring the monitoring and mitigation is fit for purpose. RBG has till not accepted the Assessed Case Outputs and elements of the Monitoring Strategy and Traffic Impact Mitigation Strategy detailed in the Written Representation and Local Impact Report
SE3	Applicant and relevant IPs	<p>One of the objectives for the Silvertown Tunnels scheme is to support economic growth (PO3).</p> <p>Can the Applicant please explain how this is compatible with the assessment of a negative cost benefit for commercial traffic which would use the tunnels as a consequence of the user charges envisaged to fund the scheme and control traffic flows to meet environmental objectives.</p> <p>It is accepted that HGVs may produce greater wear and tear on the tunnel structures, but this would not appear to justify a charging schedule that would run counter to an objective for the scheme.</p> <p>Please expand on the justification for the charging schedule that has been provided to date</p>	<p>RBG is not yet satisfied with the information regarding elasticities and value of time applied to the charge rates in the Assessed Case, and the effect this will have on travel choices for businesses and residents locally.</p>
L11 -14	Applicant and relevant IPs	These sections refer to highway lighting and although not specifically asked for comment RBG	As TfL are highway authority for the roads serving the new tunnel it would be unusual for RBG to comment on their technical approval or design process (even within planning terms). The design standards TfL adopt are in conformity with those used by RBG. If however TfL are amending any RBG roads and have to re-light them then we would be content for the standards quoted to be used. RBG would reserve the right to approve the design to ensure our spec is adopted.
L14	Applicant, Royal Borough of Greenwich and London Borough of Newham	<p>Paragraph 15.3.20 of the ES [APP-031] states that the "design of lighting for Scheme buildings" has not been completed at this stage and has therefore not been assessed...detailed lighting design would be carried out in accordance with guidelines for the reduction of obtrusive light (refer to Section 15.5...".</p> <p>(a) Please can the Applicant explain why a lighting assessment could not be undertaken on the basis of the information provided within Doc 6.3.4.2 [APP-047]?</p> <p>(b) Please can the LPAs confirm whether they consider this approach acceptable?</p>	<p>RBG would expect a lighting assessment to be submitted as part of the DCO</p>
ME1	Natural England (NE), Marine Management Organisation (MMO) and other IPs with an interest in marine ecology	<p>No surveys were undertaken to establish the marine mammal, fish and shellfish baseline; this was limited to desk based research.</p> <p>Please can IPs confirm that they are content with this approach?</p>	<p>RBG would defer to NE and MMO in this regard.</p>

ME7	The Applicant, EA, NE, the MMO, London Borough of Newham and Royal Borough of Greenwich	<p>The EA, in its RR [RR-299] identifies a discrepancy between the information provided in the CMS [APP-046] in relation to the techniques to be used in piling and those described in paragraph 10.6.69 of the ES [APP-031]. The EA also makes a request for a piling method statement to be secured through the dDCO.</p> <p>(a) Can the Applicant please confirm the techniques to be used for piling, including providing a map showing the location and duration at each piling site;</p> <p>(b) Should this be different to that assessed in the ES, the Applicant is requested to provide a revised assessment; and</p> <p>(c) Do other IPs consider that there should be a piling method statement secured through a Requirement in the dDCO or condition in the dDML which identifies piling methods, locations, duration (number of days and hours per day), seasonal limitations on piling and where/how soft start procedures would be implemented?</p>	<p>RBG would defer to NE and MMO in this regard.</p> <p>RBG's view would be DCO Requirement This is a condition we would normally require on other relevant developments. It would be appropriate for this to be a strategy required to be produced as part of the certified CoCP (Schedule 14 of the dDCO) and then submitted for approval by the LPA and EA under Requirement 5(2), Part 1, Schedule 2 of the dDCO.</p>
SW7	The EA, London Borough of Newham, Royal Borough of Greenwich and London Borough of Tower Hamlets and other IPs	<p>Please can the EA and LPAs and any other IPs interested in surface drainage matters provide their views on the disapplication of section 24 of the Water Resources Act 1991 (regarding the need for an abstraction licence), as currently drafted in Article 3(n) in the dDCO.</p> <p>The Applicant's proposal is that these matters would be enforced through the CoCP (Groundwater Monitoring and Verification Plan).</p>	RBG defers to EA on these issues
RBG Comments on issues addressed to the Applicant			
DC20	Applicant	<p>Article 2(1) "the relevant local planning authority" is only cited as being either the Royal Borough of Greenwich or the London Borough of Newham. Should the London Borough of Tower Hamlets be added to the list of relevant Local Planning Authorities' (LPAs) given that the northern portal and approaches to the Blackwall Tunnels are within that authority's area?</p>	It is RBG's view that LBTH should be given the same considerations as RBG and LBN, and for try purposes of the Scheme considered a 'host borough'
DC27	Applicant	<p>Article 2(1) "the traffic regulation measures (speed limits and restricted roads) plans" means the plans of that description set out in Schedule 14 certified by the Secretary of State as the traffic regulation measures plans for the purposes of this Order. Should this read "...traffic regulation measures(speed restricted roads) plans on...?"</p>	RBG believes this should be the case
DC35	Applicant	<p>Article 5(1) [Horizontal Limits to Deviation] In constructing or maintaining the authorised development, TfL may deviate—</p> <p>(a) laterally from the lines, situations or positioning of the authorised development shown on the works plans to the extent of the limits of deviation shown on those plans; and.....</p> <p>The limits of deviation on the works plans are co-extensive with the Order limits. This paragraph accordingly enables the authorised development to be carried out anywhere within the order limits.</p> <p>(a) What is the justification for this?</p> <p>(b) Has this degree of deviation been assessed in the ES?</p> <p>(c) Surely limits of deviation need to be specified for individual works and illustrated on Works Plans or referenced in relation to the General Arrangements Plans?</p>	RBG would require limits of deviation to be specified
DC18	Applicant	<p>Article 2(1) "the monitoring strategy" means the document of that description set out in Schedule 14 certified by the Secretary of State as the monitoring strategy for the purposes of this Order and which in particular contains commitments in respect of—</p> <p>(a) traffic monitoring;</p> <p>(b) air quality monitoring;</p> <p>(c) noise monitoring; and</p> <p>(d) socio-economic monitoring.</p> <p>Stipulating the contents of a monitoring strategy would normally be achieved in a Requirement. In this dDCO, the content of the monitoring strategy is effectively fixed by this definition. Requirement 7 merely requires the strategy to be implemented. On that basis, are the underlined words necessary? Should they more appropriately be within Requirement 7?</p>	RBG would prefer that the content of the commitments are agreed by the relevant highway authority and planning authority in the form of a requirement.
DC37	Applicant	<p>Article 5(2) Without limitation on the scope of paragraph (1), in constructing or maintaining the authorised development TfL may within the limits mentioned in paragraph (1)—</p> <p>(a) deviate from the points of commencement and termination of those parts of the authorised development shown on the works plans; and</p> <p>(b) deviate from the design of any tunnel or tunnel structure and vary the number of tunnels and tunnel structures shown on the engineering section drawings and plans.</p> <p>Again this appears to allow significant deviation of the tunnel commencement and termination and significant variation of the scheme, in particular would it be the same scheme if there were a different number of tunnels and tunnel structures?</p> <p>(a) What is the justification for this?</p> <p>(b) Has this degree of variation been assessed in the ES?</p>	RBG would require limits of deviation
DC40	Applicant	<p>Article 11 [Access to works] This is a very wide power</p> <p>Does there need to be an approval process by Local Planning Authorities (LPAs) and where appropriate Local Highway Authorities?</p>	RBG would require an approval process defined and included as a requirement.
DC70	Applicant	<p>Article 50(4) The road described in Part 2 of Schedule 10 shall cease to be a Greater London Authority (GLA) road on such day as TfL may determine, as if from that day it was the subject of an order directing the same under section 14B of the 1980 Act.</p> <p>Has the local highway authority been asked to comment on this proposal?</p>	Yes.
DC72	Applicant	<p>Article 52(2) TfL may revise the charging policy but only after it has—</p> <p>(a) consulted in relation to the proposed changes to the policy—</p> <p>(i) organisations it considers representative of regular users of the Blackwall Tunnel and the Silvertown Tunnel; and</p> <p>(ii) the Councils of the London Boroughs of Newham and Tower Hamlets and the Royal Borough of Greenwich;</p> <p>(b) considered the responses to the consultation carried out under sub-paragraph (a); and</p> <p>(c) submitted the proposed revised charging policy to the Mayor of London for approval.</p> <p>Should this paragraph also include a condition to the effect that TfL also needs to consider recommendations made by Silvertown Tunnel Implementation Group (STIG) under Article 65(5) before revising the charging policy?</p> <p>(c) the level of charges from time to time required to be paid for use of the tunnels under article 53 and any exemptions and discounts.</p> <p>Should STIG also be able to consider the level of penalties?</p>	<p>In principle RBG agree STIG should be expected to input to any consideration of charge variation, however RBG's wider concerns regarding the role of STIG is set out in detail in the Written Representation and Local Impact Report</p> <p>RBG would not wish STIG to take a view on this</p>

DC86	Applicant	<p>Article 65(6) The first meeting of STIG must be held not less than three years before the date on which the Silvertown Tunnel is expected to be open for public use. Once the monitoring strategy and the traffic impacts mitigation strategy have been implemented in accordance with their provisions, STIG will meet as determined by TfL, but not more frequently than once a year.</p> <p>The Charging Policy (Doc 7.11)[APP-107] at section 3.2 indicates that proposed changes to the Charging Policy will be put to STIG, who may make recommendations. Is the limitation on the frequency of STIG meetings likely to cause any difficulties in this context?</p>	The infrequency of the STIG meetings could pose a problem, RBG's suggestions for addressing this are set out in the LIR and Written Representation
DC87	Applicant	<p>Article 65(7)(c) In order for a meeting of STIG to be quorate there must be present—</p> <p>(a) a representative from at least two of the Councils of the Royal Borough of Greenwich and the London Boroughs of Newham and Tower Hamlets;</p> <p>(b) a representative from TfL; and</p> <p>(c) two other representatives from the bodies listed in paragraph (2)(a) to (n) above.</p> <p>As drafted, (c) could be met by two additional representatives from TfL or the Councils referred to in Article 65(7)(a). Should (c) read "two representatives from the other bodies listed...?"</p>	RBG has concern that STIG is simply an advisory body (decision making lies with TfL's Board), however for issues voted on by STIG, RBG believes TfL (corporately) should have a single vote regardless of how many invited internal TfL departments are co-opted to a meeting
DC88	Applicant	<p>Article 65(12) Part VA of the Local Government Act 1972 (Access to meetings and documents of certain authorities, committees and sub-committees) and the Public Bodies (Admission to Meetings) Act 1960 do not apply to STIG or to its meetings or proceedings.</p> <p>If these provisions are not to apply, should there be some other mechanism whereby the public would be able to find out what had been discussed and what recommendations STIG had made to TfL in the interests of transparency?</p>	Yes this mechanism needs to be defined and agreed.
DC89	Applicant	<p>Schedule 1 - There is no distinction in Schedule 1 between integral works and associated development.</p> <p>Should the Works No 20 for the proposed temporary jetty and amongst the ancillary and related development (v) construction compounds be noted as associated development?</p>	Yes
DC90	Applicant	<p>Schedule 1 - The works listed after Work 20 as being for the purposes of or in connection with the construction of any of the works or other development are very widely drawn, particularly (y).</p> <p>Does there need to be a caveat governing all these works indicating that they must fall within the parameters assessed in the ES and subject to the mitigation referred thereto and secured elsewhere in the draft Order?</p> <p>The typographic error in the date cited in (h) should be corrected</p>	Yes
DC92	Applicant	<p>Requirement 4(1) requires approval of above ground buildings and structures from the relevant LPA. However this is limited by Requirement 4(3). Requirement 4(3) only applies Requirement 4(1) to works Nos 11(b) and 11(c), 12(a) and 17(a). However, there are also head houses, portal fascia and wing walls, anti-recirculation walls, and other new viaducts, and replacement building and retaining walls that fall outside the specified works.</p> <p>Do Works Nos 1(d), 1(f), 2(b), 2(c), 13 and 15(d) additionally need to be inserted into Requirement 4(3), probably together with a 'catch all' relating to similar buildings or structures that form parts of other works?</p>	Yes
DC93	Applicant	<p>Requirement 5(1) and (2) - The "Construction Method Statement" is not tied into this requirement whereas it defines significant aspects of the works assessed in the ES including temporary works compounds and the temporary jetty that need to be governed by the provisions of the dDCO including the dDM.</p> <p>It would seem that "...and the Construction Method Statement" should be added at the end of Requirement 5(1)?</p> <p>In the preamble to Requirement 5(2), should the approval not specify the relevant LPA in every case, following consultation with the EA, Historic England, The Greater Archaeological Service and other statutory bodies as appropriate?</p> <p>Should a revised FRA be included as one of the subsidiary plans in Requirement 5(2) given the Relevant Representation (RR) of the EA [RR-299]? If not, should a process for approving a revised FRA be inserted in Requirement 11?</p>	Yes
DC94	Applicant	<p>Requirement 5(2) No part of the authorised development may be commenced until the following plans and strategies, required by the code of construction practice, have been prepared for that part of the authorised development and (where applicable) approved by the relevant planning authority or the Environment Agency (as the case may be)—</p> <p>Some plans and schemes, are merely required to be prepared before commencement, but not to be approved. No justification for the distinction is provided in the EM. Can the Applicant prepare a table providing such justification in respect of those documents in Requirement 5(2)(a)-(c) that are not proposed to be independently approved?</p> <p>It is also noted that there is no equivalent provision for either preparation or approval in respect of the Site Waste Management Plan (SWMP). Why?</p>	Plans should be required to be approved by the LPA and other bodies.
DC102	Applicant	<p>Requirement 12(1) There is no requirement to retain noise mitigation measures after implementation and certain terms such as "noise barriers" and low noise surfacing" do not seem to have been defined.</p>	
DC103	Applicant	<p>Schedule 2 Part 2 [Procedure for discharge of requirements]</p> <p>Given the scale and scope of approvals and consents required e.g. under the CoCP, should this Part include a provision for the submission of advance drafts of applications unless otherwise agreed with the LPA (as in paragraph 1 of Schedule 17 of the Thames Tideway Tunnel DCO)?</p> <p>Requirements Generally</p> <p>A number of matters do not seem to be governed by Requirements or other provisions in the dDCO.</p> <p>Please consider the desirability of adding Requirements or other provisions (such as in the dDNML) that would address:</p> <p>(a) The Water Framework Directive Assessment;</p> <p>(b) A Piling Management Plan to include piling locations, types of piling proposed at each location, duration of piling (both in terms of number of</p> <p>(c) Decommissioning of the temporary jetty and other temporary works needed during construction including the preparation, submission and agreement</p> <p>(d) Construction hours of working, including details of plant and equipment that would be operated 24/7; and</p> <p>(e) Air quality monitoring and mitigation.</p>	<p>RBG would wish to see advanced drafts prepared and discussed with the relevant LPA.</p> <p>Yes - for all (a) to (e) sections above.</p>
PN1	Applicant	<p>Principle and nature of the development including alternatives</p> <p>The case for the scheme as set out in Document 7.1 [APP-093] refers to the evolution of the scheme within the overall strategy for new River Crossings in London which is summarised in Connecting the Capital, 2015 [AS-008].</p> <p>Document 7.1 [APP-093] states that proposals for river crossings at Gallions Reach and Belvedere could be in place "soon after the Silvertown Tunnel".</p> <p>Can the Applicant please explain why therefore the Mayors Transport Strategy (MTS) Policy 39 [AS-007] and the supporting text to the London Plan (para 6.101[AS-006]) refers to a longer-term fixed link at Gallions Reach?</p> <p>The ExA would, in answering this question, like to draw the Applicant's to TfL's attention to its own documents "Gallions Reach and Belvedere Consultation Leaflet"; Gallions Reach and Belvedere River Crossings Option Assessment Report (Long List); and Option Assessment Report (Public Transport Interim 1) etc.</p> <p>These documents indicate that consultations have been continuing, with proposals being refined for multi-modal crossings at both Gallions Reach and Belvedere.</p> <p>Although such proposals are stated to not provide complete solutions to the congestion and resilience issues in relation to the Blackwall tunnel, please provide a justification for the priority being afforded to the Silvertown Tunnel as opposed to spreading the benefits of further river crossings more widely as an earlier priority?</p> <p>To enable all Interested Parties to have clear access to the documents referenced above, the documents named in this question should be submitted to this Examination.</p> <p>Can the Applicant please explain why therefore the Mayors Transport Strategy (MTS) Policy 39 [AS-007] and the supporting text to the London Plan (para 6.101[AS-006]) refers to a longer-term fixed link at Gallions Reach?</p>	RBG's stance throughout the consultations on review of river crossings is that a package of crossings with both public transport and highways capacity are required to address the severance of the River Thames and support growth, this is detailed in the LIR and WR.

		<p>The ExA would, in answering this question, like to draw the Applicant's to TfL's attention to its own documents "Gallions Reach and Belvedere Consultation Leaflet"; Gallions Reach and Belvedere River Crossings Option Assessment Report (Long List); and Option Assessment Report (Public Transport Interim List).</p> <p>These documents indicate that consultations have been continuing, with proposals being refined for multi-modal crossings at both Gallions Reach and Belvedere. Although such proposals are stated to not provide complete solutions to the congestion and resilience issues in relation to the Blackwall tunnel, please provide a justification for the priority being afforded to the Silvertown Tunnel as opposed to spreading the benefits of further river crossings more widely as an earlier priority? To enable all Interested Parties to have clear access to the documents referenced above, the documents named in this question should be submitted to this Examination.</p> <p>The case for the scheme (Document 7.1)[APP-093] indicates why a third bore for the Blackwall Tunnel is not considered feasible as a consequence of tie-in difficulties and need for tidal flow arrangements. However, it also indicates that a protracted closure of the Blackwall Tunnel may be necessary for structural maintenance reasons given the age of the infrastructure in the relatively near future.</p> <p>If such a scenario is envisaged, presumably in the first instance for the much older and more restrictive northbound tunnel, no consideration appears to have been given as to whether such works might enable the current alignment, height and width restrictions to be overcome through a re-construction of that tunnel? Nor does it explain whether, if such work is possible, why the Silvertown Tunnel would still be required.</p> <p>If such an assessment has been made, please provide the documentation.</p> <p>If an assessment has not been undertaken, please indicate the feasibility of such a solution, in particular, how such works would assist the present problem of incidents caused by over-height vehicles?</p> <p>Given the problems caused by over-height vehicles in the existing Blackwall Tunnel, please justify the lack of a proposal for a complete prohibition on Heavy Goods Vehicles (HGVs) and Public service Vehicles (PSVs) from using the existing Blackwall Tunnel once the Silvertown Tunnel is operational?</p>	This is also a concern for RBG and included in the LIR and VWR
PN6	Applicant	<p>In the Update Report submitted following the Mayor's Review [AS-021], there is reference to commitment to provide new bus services through the Silvertown Tunnel and also to the possibility of these including a cycle carry-in bus service.</p> <p>Would the new services be secured through a Development Consent Obligation?</p>	RBG would require these services incorporated into a Bus Strategy as a Requirement and is included in LIR/VWR
MR4	Applicant	<p>How is the commitment of 50% (by weight) of waste arisings to be transported by river to be monitored and reported upon during the construction phase as set out in the CoCP [APP-092]?</p> <p>How does this relate to the 100% of "suitable excavated material" referred to in the Update Report [AS-021].</p> <p>That Report also refers to the amount of construction materials to be transported by river to be increased to 55%.</p> <p>How would all these intentions be secured in the dDCO?</p>	RBG would agree that these measures should be included in the DCO as set out in the LIR/VWR