



## **Silvertown Tunnel Development Consent Order**

### **Written Representations**

### **The Royal Borough of Greenwich**

15<sup>th</sup> November 2016

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## 1. CONTEXT

- 1.1 This document provides the Written Representation of The Royal Borough of Greenwich (RBG) in response to the DCO submission from Transport for London (TfL) for the Silvertown Tunnel scheme (the Scheme). It should be read in conjunction with RBG's other submissions.
- 1.2 This document expands on the Relevant Representation already submitted by RBG, and seeks to set the contextual background to the more technical Local Impact Report.
- 1.3 This document also suggests potential mitigation which should be secured as part of the DCO process and which the promoter has not yet included in any of the submitted documents. A summary of significant issues and suggested mitigations is included in RBG's Local Impact Report<sup>1</sup>.
- 1.4 To contextualise this Representation, RBG's primary concern is to protect the interest and wellbeing of residents, businesses and visitors to the Borough now and in the future. Furthermore RBG is committed to the sustainable development of both the Royal Borough and the wider east and south east London sub-region.

## 2. INTRODUCTION

- 2.1 RBG has, on a number of occasions, publicly shown support and made the case for additional river crossings. RBG has stressed the fact that a package of schemes is needed to address the growth in the east and south east of London, both current and predicted, and the severance, and inequality of access caused by the lack of river crossings of the Thames to the east of Tower Bridge. The view of RBG is this needs to address both road and public transport (particularly fixed rail) based movement, as well as facilitating walking and cycling.
- 2.2 There have been significant improvements in infrastructure and services (Jubilee line extension, DLR extensions, river services and Crossrail) to facilitate non-vehicular journeys across the River. However an adequate package of new vehicular river crossings (and associated public transport improvements) is required to support the essential growth and development of east and south east London, it is RBG's view that these should be delivered from west to east mirroring the growth of the sub-region.

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<sup>1</sup> LIR Appendix 2

- 2.3 The Blackwall Tunnel is operating at, or near to, capacity for long periods of the day, and journey time is unreliable due to the effect of congestion in the peak periods and during unplanned closures. Air quality is poor on the tunnel approaches and often made worse by stationary queuing traffic.
- 2.4 A lack of resilience at Blackwall, and a lack of suitable alternative cross river routes for vehicles, means that in the case of a protracted closure there is quickly gridlock on the local road network, and then across the sub regional network. Without additional river crossing capacity it is expected there will be an increase in congestion and delays on this already unreliable link. TfL's traffic forecasts (LTS) suggest that levels of congestion will increase most in the east sub-region. Local businesses in the area rate transport as a significantly greater problem than businesses elsewhere in London.
- 2.5 Significant growth in population is projected in the sub region. For the Borough future growth, in the short to medium term, will be focused on RBGs Opportunity and Intensification Areas and the new Housing Zone - Greenwich Peninsula, Kidbrooke, Charlton Riverside, Woolwich and Thamesmead.
- 2.6 That growth and development is being, and will continue to be, hindered by the lack of an adequate package of river crossings in east and south east London. RBG therefore supports the principle of the construction of a new tunnel at Silvertown to facilitate necessary growth and development as part of a wider package of crossings.
- 2.7 RBG's support for the Scheme is subject to TfL providing acceptable clarification of key elements within the proposal alongside associated mitigation (where necessary). RBG is questioning the outputs of the TfL Assessed Case, and consequently the predicted traffic forecasts, congestion on the local network, air quality and noise concerns which are predicated on that Case. RBG require TfL to demonstrate that the scheme will result in no detrimental effect, and would expect improvements, to Air Quality and Congestion.
- 2.8 RBG has previously accepted the principle of charging the crossings to manage demand. Nevertheless we require further detail on the acceptability of the charge rate and its effect on local businesses and residents and its impact on addressing Convergence in the east and south east of London (both positively and negatively).RBG is unconvinced by the arguments TfL has put forward to justify the omission of a discount scheme for "host Borough" residents and businesses and believes a discount scheme should still be given consideration.
- 2.9 Although the Scheme is acknowledged by TfL as being part of a package of crossings, developing it without committed and funded proposals for other crossings fails to address RBG's concerns about future cross river network capacity.
- 2.10 The Mayor of London's announcement on 4<sup>th</sup> October on river crossings and enhancements to the Scheme are, as yet, neither committed or funded schemes. Accordingly they, do not form part of the DCO submissions or influence the traffic models at this stage. Until such time as the proposals set out in the announcement are incorporated into the

Scheme it is RBG's view that they cannot be considered. This is discussed in detail in relation to assumptions in the assessed case regarding bus service provision in RBG's Local Impact Report (LIR)<sup>2</sup>.

### **3. TRAFFIC GROWTH AND MODELLING**

- 3.1 RBG's LIR details why the Base and Reference Case models are accepted as fit for purpose. It also explains why there are still doubts over the outputs of the Assessed Case which have not yet been agreed by the Host Boroughs<sup>3</sup>. The independent review of the Assessed Case both casts doubt on the strategic model's ability to accurately model the effect of queue length on local junctions<sup>4</sup>, and confirms that the Audit does not review the derivation of the charges chosen by TfL to be modelled<sup>5</sup>.
- 3.2 The uncertainties around the accuracy of the outputs are especially true in relation to the user charge elasticities and assumptions; a behavioural change sub model has not fed back in to the strategic model. The willingness and ability of people to pay in the future for a currently free crossing has not been fully demonstrated by TfL in relation to the particular demographics of the sub region.
- 3.3 A recent example of where behavioural aspects of demand were not accurately assessed by TfL was the DLR extension to Woolwich Arsenal. Here peak time services had to be doubled within a very short time of the service's 2009 commencement to meet a level of demand which TfL had not forecast.
- 3.3 Notwithstanding the Mayor of London's recent announcement (that they would form part of the next TfL Business Plan) the modelled bus routes in the Assessed Case are not, as yet, secured through the DCO. RBG takes the view that these should be included in the DCO in the form of a Requirement for a Bus Strategy to be produced by TfL and approved by the Host Boroughs prior to the Scheme's opening.

### **4. LOCAL NETWORK IMPACTS**

- 4.1 RBG acknowledges that the scheme design has evolved such that the impact on the built environment and arrangements for connecting into the road network on Greenwich Peninsula are generally acceptable.

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<sup>2</sup> LIR Paragraph 129. C

<sup>3</sup> LIR Paragraph 127 and following

<sup>4</sup> Steer Davis Gleave River Crossings Model Review - Assessed Case; October 2016; Paragraph 2.61

<sup>5</sup> Steer Davis Gleave River Crossing Model Review - Assessed Case; November 2016; Paragraph 4.12

- 4.2 Whilst RBG has not agreed the Assessed Cases quantum of traffic the predicted compressed evening peak is agreed. A primary concern is this compressed peak period will (southbound) place stress on the local network even if, as TfL predict, there is no overall increase in vehicle movements (despite the capacity enhancements) through the two tunnels.
- 4.3 The fact that capacity is effectively doubled will mean that junctions on the A102/2 corridor which are already at capacity will see additional queuing, and the associated air quality and congestion issues.
- 4.4 RBG's LIR sets out in detail those junctions on this part of the network which are already subject to capacity constraints<sup>6</sup>. Although the Assessed Case model demonstrates a further increase in traffic at these junctions TfL do not regard this as significant. No mitigation is proposed ahead the Scheme's opening. RBG's view is that funded mitigation should be agreed with TfL and the Host Boroughs and be implemented in a timely way and during the period of the Scheme's construction.
- 4.5 Without agreement to implement mitigation in advance of the Scheme's opening, RBG is continuing to ask TfL for detail of the value of time and elasticities modelled in the Assessed Case. In the absence of that information RBG has limited confidence of the model's ability to accurately reflect the demand flows.
- 4.6 Mitigation of additional demand at Woolwich Ferry through any proposal to introduce user charging would require primary legislation. Notwithstanding that the Assessed Case may be underestimating displacement to the free crossings, the model still shows a significant increase in queued traffic at the Woolwich Ferry's southern approach. No mitigation is currently proposed by TfL to effectively manage this.
- 4.7 There have been a number of recent consultations on new river crossings in east London by TfL. In TfL's consultations on East of Silvertown river crossings the 'new crossings' (a replacement/upgraded ferry at Woolwich, and fixed crossings at Gallions Reach and Belvedere) were proposed to be tolled. The responses to issues raised reports by TfL on the October 2012 and the July 2014 consultations both confirmed that this was needed to manage demand:
- 'Some respondents commented that they supported a peak-time charge to use the Woolwich Ferry, while others explained that they did not support charging on the basis that the Woolwich Ferry is a free crossing point.*
- We have proposed user charging as a means to manage demand for new river crossings in east London and to provide a source of funding to help pay for their construction and operation. We have proposed that*

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<sup>6</sup> LIR Paragraph 130 and following and Appendix I

*the Blackwall Tunnel, Silvertown Tunnel and any new crossing further east should all be charged. If there were a nearby and convenient crossing point that was not charged, traffic might divert to it to avoid paying. This would be likely to focus demand and associated congestion at the uncharged crossing point. As such, we would keep the need for any charging strategy to include the Woolwich Ferry under review'.<sup>7</sup>*

- 4.8 The non-statutory consultation for the Scheme (October to December 2014) indicated that charges were to be levied on the Woolwich Ferry<sup>8</sup>:

*'It is assumed for the purpose of this assessment that the Woolwich Ferry continues to operate, albeit as a new ferry with 30% extra capacity and charges consistent with the Blackwall and Silvertown tunnels'.*

- 4.9 In the Statutory S42 Consultation (October 2015) proposals for charging the Woolwich ferry had been removed:

*'There are no proposals to impose user charges at the two adjacent crossings, the Rotherhithe Tunnel or the Woolwich Ferry, as part of this Scheme. It is not expected that a significant number of drivers would divert to either of these to avoid the charges at the Blackwall and Silvertown tunnels'.<sup>9</sup>*

- 4.10 RBG was disappointed to listen to TfL's apparent refusal to consider the introduction of charges at the Woolwich Ferry, even as a contingency option, when questioned at the Open Floor Hearings on the 13th October. RBG's view is that failing to prepare in a timely way to, if necessary, apply a charge at these 'free to use' crossings could result in significant delays and congestion on the local network in their vicinity.

- 4.11 RBG is particularly concerned that, should the proposed monitoring and mitigation demonstrate at a future date that charges are required, there appears to be no consideration of any mechanism to allow their timely introduction at the Woolwich Ferry, given the fact that changes to Primary Legislation will be required.

- 4.12 The Maritime Greenwich World Heritage Site (MGWHS) is one of only 30 such sites in the UK and currently attracts approximately 9 million national and international visitors each year. The MGWHS is located between the Blackwall and Rotherhithe tunnels on the A206 Strategic Road Network (SRN). In line with key goals and objectives set out in the Maritime Greenwich World Heritage Site Management Plan's Third Revision (2014), World Heritage partner organisations have been working with RBG to improve and promote the visitor experience and to meet obligations under the 1972 World Heritage Convention for the protection, conservation and presentation of the MGWHS. Any displacement of traffic through the MGWHS as a result of the Scheme (either to access the free crossing at Rotherhithe or the proposed Silvertown tunnel) is unacceptable.

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<sup>7</sup> TfL River Crossings programme Responses to issues raised (A.14) [https://consultations.tfl.gov.uk/roads/river-crossings/user\\_uploads/east-of-silvertown-responses-to-issues-raised.pdf](https://consultations.tfl.gov.uk/roads/river-crossings/user_uploads/east-of-silvertown-responses-to-issues-raised.pdf)

<sup>8</sup> Introductory Transport Assessment October 2014 (1.13)

<sup>9</sup> Preliminary Case for the Scheme October 2105 (4.5.5)

- 4.13 RBG would expect the detailed modelling of the junctions on the northern side of the Thames to address any concerns of the Boroughs of Newham and Tower Hamlets, and to demonstrate that the junctions have sufficient capacity to meet the projected demand, in order to avoid traffic, particularly oversized HGVs, diverting to Blackwall to avoid congestion. If this were to be the case then the potential for unplanned closures of the north-bound Blackwall Tunnel would again become an issue – undermining the forecast improvements in resilience.
- 4.14 RBG welcomes the Mayor's call for additional cycling and walking measures to be built into the scheme. However the opportunity should be taken to further mitigate the environmental impact and severance of the tunnel at and adjacent to the southern portal through the introduction of green walls and/or bridges to complement noise mitigation measures that are required further south alongside the A102. This needs to be an integral part of the Scheme.

## **5. AIR QUALITY AND NOISE**

- 5.1 The lack of confidence in the outputs of the Assessed Case has a direct correlation to RBG's concerns in relation to Air Quality.
- 5.2 Air pollution is the fourth highest risk factor for death globally and by far the leading environmental risk factor for disease; reducing air pollution is an incredibly efficient way to improve the health of a population. RBG is ranked 144th of 354 local authorities in the National Atmospheric Emission Inventory air quality score, based on concentrations of NO<sub>x</sub>, particulate matter, benzene and sulphur dioxide - all of which have potentially negative long and short term health impacts. In Greenwich, latest (2013) data suggests 6.6% of all-cause mortality is attributable to particulate air pollution: this is similar to the London-wide level of 6.7%, and is down from 7.2% in 2010.
- 5.3 The A102/A2 corridor has some of the poorest air quality in the Borough. The Scheme provides a cross river link for full height vehicles which currently cannot be accommodated at Blackwall as well as dedicated through tunnel lanes.
- 5.4 The Assessed Case outputs give limited detail of additional HGV movements. RBG is of the view that additional large vehicles will be attracted to the new link. These are likely to be diesel powered and as such will contribute to the NO<sub>x</sub> levels which are already some of the highest in the UK.

- 5.5 The biggest health impacts from the tunnel itself are likely to come from air quality and noise related effects. A summary of evidence is presented in the Local Impact Report<sup>10</sup> – the relationship between air quality and health is well established. The Health Impact Assessment presented by TfL suggests that there is unlikely to be any negative impacts as a result of the tunnel. As with so many of the potential issues with the Scheme, this is predicated on the traffic model which predicts reduced levels of traffic and congestion when Silvertown is operational. If this is to be the case, then whilst the construction phase health impacts will continue to need to be monitored and mitigated where appropriate, the overall health impacts of the Scheme may be less significant.
- 5.6 A primary concern for RBG is that, in the pm peak, southbound congestion on the A102/A2 is currently limited by the capacity of the Blackwall tunnel. However local junctions are still operating at capacity (as discussed earlier in the document). The additional ‘compressed’ through put consequently has the potential to lead to additional health issues away from the immediate tunnel vicinity and at junctions on the local network.
- 5.7 Seibert Road is directly adjacent to the A102’s northbound carriageway. Currently there is no noise mitigation for residents. When free flow conditions are experienced road noise levels are at their highest. The Scheme will (according to TfL’s models) allow these conditions to be experienced more often and therefore noise levels will potentially be higher. TfL have agreed to fund the implementation of noise barriers if the Scheme is approved as part of a separate legal agreement. RBG would wish this included as a Requirement<sup>11</sup>.

## **6. USER CHARGING AND CONVERGENCE**

- 6.1 Although RBG accepts the need to charge for use of any new vehicular crossing in order to manage demand, we are concerned that the proposed charges will have a negative effect on residents and businesses in RBG.
- 6.2 TfL are proposing a tidal charge rate therefore it is likely that Greenwich residents and businesses crossing the river on work related journeys will be subject to the higher charge rate for both their morning and evening trips.
- 6.3 Notwithstanding the points made in the Local Impact Report regarding inconsistent data, including that relating to the origin and destination of tunnel users, it is accepted by RBG that although the Blackwall Tunnel is a strategic link a number of journeys start or end in Greenwich<sup>13</sup>. RBG is not convinced that these numbers are sufficient to undermine the traffic demand management should a local discount be applied.

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<sup>10</sup> LIR Paragraph 239 and following

<sup>11</sup> LIR Paragraph 238

<sup>13</sup> LIR Paragraph 135 and following

- 6.4 The Host Boroughs have been working with previous Mayors of London and other Olympic boroughs since before 2012 to address the “Convergence” agenda, the aim of which is to address inequalities experienced in the sub region with the objective to bring East London boroughs up to the opportunity and environment levels of their equivalents in Central and West London. Whilst RBG is cognisant of the fact that the charge is required to manage demand, we are also clear that the affordability of the charge for local people could be a barrier to employment and business opportunities. RBG would request further consideration of a resident discount scheme, based on the model applied at the Dartford Crossing.
- 6.5 As it is indicated in TfL submission the modelled charge may not be the one which is ultimately applied. There is an absence of an acceptable mechanism, framework and triggers for setting the initial charge and agreeing changes to the future charges in the submitted documents. RBG would wish to see TfL required to set these as part of the DCO process.

## **7. ECONOMIC CASE**

- 7.1 The Strategic Case<sup>14</sup> presented by TfL clearly sets out the constraints currently associated with vehicular river crossings in east London and, specifically, the issues relating to the current operation of the Blackwall Tunnel. Whilst these are considered to be relevant points, there is an absence of clarity on the influence that the proposed user charges will have upon the ultimate operation of the Scheme.
- 7.2 It is stated by TfL that the aim of the user charge will be to regulate the overall flow of traffic across both crossings. The process by which this is achieved remains unclear and this constitutes a fundamental risk with a range of outputs from the Business Case<sup>15</sup> assessment. There is also limited evidence of consideration of the impact of the charges on individual user groups, with the underlying inference being that only those who can afford to pay will be affected. This fails to recognise the wide range of both businesses and individuals, including SME’s, that will be affected and the reliance many currently have upon the crossing facility.
- 7.3 Underlying the business case process is the assumption that overall vehicular flows across the A102 corridor will remain relatively constant. If traffic flows increase, then the potential network wide traffic impacts will be considerable but most notably within the local vicinity of the crossings. Given the emphasis that parts of the business case place upon the regeneration and wider impacts of the Scheme, it seems likely there is potentially significant additional demand for crossing provision as east and south east of London develops. The potential if this demand is not to translate into additional flows is that higher charges will need to be applied, further restricting provision to higher income groups.

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<sup>14</sup> TfL’s Submitted document 7.1

<sup>15</sup> TfL’s Submitted document 7.8

- 7.4 The Economic Case for the Scheme<sup>16</sup> is built upon the outputs from the RxHAM and Rail-plan modelling work. RBG's Local Impact Report details why the base and reference case models are accepted as fit for purpose, but also why there are still doubts over the outputs from the assessed case which has not been agreed by the Host Boroughs.
- 7.5 The primary outputs for the Economic Case are predicated upon maintaining current traffic flows across the A102 corridor, within minimal displacement of trips to alternative routes. The absence of user charges upon the Woolwich Ferry and Rotherhithe Tunnel represent a risk to the latter assumption, whilst the ability to accurately forecast user charge elasticities in the face of substantial sub-regional growth represents a risk to the former.
- 7.6 A central element of the forecast scheme benefits relate to the provision of enhanced bus services. Between 50% and 60% of user scheme benefits are forecast to be derived from bus and coach users. It is acknowledged that the Scheme will permit substantial revisions to bus service operations, and that such revisions would be welcomed, and clearly beneficial. However the bus routes incorporated within the Assessed Case are not, as yet, secured through the DCO. This represents a considerable risk to the business case. The enhanced bus routes should be incorporated into the DCO in the form of a requirement for a Bus Strategy.
- 7.7 As well as public transport benefits, the economic appraisal also indicates large net benefits for business car drivers; however, net benefits for non-business car drivers are relatively small and for LGV and HGVs there are potentially negative. Whilst the Business Case suggests that standard values of time do not capture all of the benefits for these trips, it nonetheless highlights the impact of user charges and how this can affect both freight trips and non-business trips.
- 7.8 A notable outcome of TfL's Economic Assessment is the inference that a significant proportion of weekday benefits are derived from the 3-hour PM Peak period, as opposed to the 4-hour AM Peak, and 9 hour inter/off-peak periods. No evidence is provided to verify this outcome is robust.
- 7.9 The user benefits are reliant upon the application of values of time. It is understood that standard UK values of time have been applied throughout the appraisal. A separate sensitivity test applies the London-specific values of time. Neither the London nor National values are totally representative of the impact boroughs. A local value of time should be applied to the model. It is RBG's view that the choice, and influence, of the values of time is not fully considered within the documentation.

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<sup>16</sup> TfL's Submitted Document 7.8.1

- 7.10 Journey time reliability benefits are presented separately from the core transport economic efficiency analysis. They include both standard assessment of reliability that examines the variance, or standard deviation, of journey times, but also more bespoke assessments of the impact of incidents that currently lead to the closure of the Blackwall Tunnel. Whilst the approaches adopted are considered logical, the fact that they include non-standard approaches means it is important that the benefits are clearly isolated from the main output data.
- 7.11 The presentation of distributional impact is aggregate in nature and there is a lack of clarity on the impacts that the scheme will have upon different socio-economic groups. The underlying premise that the Blackwall Tunnel is only used by medium-higher income groups and so the introduction of user charges will have limited impact is a generalisation and fails to recognise the varying needs of both residents, as well as local businesses.
- 7.12 The user charge is to be utilised by TfL to manage demand. This will inevitably require charge increases over time that will affect both lower income groups and SME operations disproportionately.
- 7.13 The social analysis incorporates a range of outputs that are reliant upon the modelling assumption that current traffic flows are maintained. This includes the accident analysis and severance, as well as to a lesser degree journey quality. Similarly the assessment of option values / non-use values and accessibility are reliant upon the proposed bus service enhancements, which should not be modelled until the service level are a committed part of the Scheme.
- 7.14 The analysis of regeneration impact draws upon the significant opportunities that undoubtedly exist within the east and south east sub-region. The identified journey time improvements and reliability improvements will support the regeneration proposals across the area. It is considered that the assessment is relatively strategic in nature and, again, does not consider the impact of user charges. These will affect user choices but are also particularly important as they aim to maintain current traffic flows and so, by inference, the opportunity to travel more across the Thames is still constrained.

## **8. CONSTRUCTION IMPACTS**

- 8.1 The proposed southern portal and link roads are located on the Greenwich Peninsula (a London Plan Opportunity Area). The area is subject to a complex, approved, development programme, and its build out is instrumental in helping to deliver the affordable housing and employment opportunities critical to London's growth. Additionally it is home to the O2, one of the most successful global entertainment venues, and the Borough's only underground station, the Jubilee Line at North Greenwich.

- 8.2 Throughout the build phase it is crucial that the local road network continues to function and be allowed to develop effectively in order to not only facilitate but also to safeguard the residents and businesses who already live and operate on the Peninsula. It is RBG's view that TfL must work with RBG (as both Local Planning and Highway Authority) as well as Interested Parties, including primary Peninsula stakeholders and developers, such as Brentag, U&I, AEG and Knight Dragon, to ensure the build programme addresses potentially conflicting demands. Solutions to facilitate this complex interaction need to be agreed as part of the DCO process.
- 8.3 The Millennium Busway is a segregated two way bus route which runs the length of Greenwich Peninsula between the Peninsula Park and West Parkside.
- 8.4 The Busway was originally designed to accommodate Greenwich Waterfront Transit. The design was set out for a tram route, which was later changed by TfL to a guided bus system, then further downgraded to bus Transit. The scheme was finally cancelled in its entirety by the previous Mayor of London. The two roads give the appearance of a traditional duel carriageway and consequently existing junction layouts are complex. For both road users and pedestrians the layout does not necessarily appear intuitive.
- 8.5 A number of serious and fatal accidents have occurred on its length, and for a number of years RBG has been pressing both TfL and the Greater London Authority (who have ownership of the Busway) to look at more conventional highway layouts. Currently the redesign (led by TfL) is progressing to develop a traditional duel carriageway layout with bus priority measures, which the Borough would wish to see implemented as quickly as possible. TfL are consulting on the option from 24<sup>th</sup> October to 4<sup>th</sup> December 2016<sup>17</sup>.
- 8.6 It is RBG's clear view that TfL should both acknowledge, and take account of, this work and do everything it can to facilitate the prompt implementation of this realignment of highways. This should be specifically referenced in TfL's Code of Construction Practice<sup>18</sup> (CoCP) and Construction Method Statement<sup>19</sup> (CMS) and subsequent incorporated into the contractors Construction Environment Management Plans.
- 8.7 RBG welcomes TfL's plans to remove spoil by river, but requires assurances via the DCO through the CoCP that the contracts will prescribe an agreed minimum amount to be removed or imported by river from both the northern and southern construction sites. Currently the CoCP simply states an overall quantum all of which could be achieved solely from the northern work site, leaving all movement from the southern site by road. This is

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<sup>17</sup> <https://consultations.tfl.gov.uk/roads/west-parkside>

<sup>18</sup> TfL Document 6.10

<sup>19</sup> Document Reference: 6.3.4.1

not acceptable. The documents should also be revised to incorporate the increase from 50 to 55% announced by the Mayor on 4<sup>th</sup> October.

- 8.8 The submitted CMS (in section 7.3.12) references the ‘envisaged lorry routes’ of the ‘envisaged design’. RBG would wish to see lorry routes confirmed via the DCO which precludes the subsequent ‘rat running’ where heavy vehicles divert on to local roads such as Westcombe Hill to avoid queues on the A102/A2. An example of this arrangement being delivered successfully was through the site specific Environmental Minimum Standard documents created for Crossrail. There the primary routes were agreed and any proposed diversion from these required by the promoter or their contractors had to be approved in detail by the Highway Authority.
- 8.9 The CMS also includes a map indicating a ‘short haul HGV route’<sup>20</sup> which diverts from the TLRN and SRN on to local roads to access Brewery Wharf.
- 8.10 The investigation of the use of Brewery Wharf by TfL is unhelpful. On several occasions RBG has asked for this option to be de-scoped given the number of heavy vehicle movements the use of that Wharf would require on the local road network, and through residential streets adjacent to the MGWHS.
- 8.11 The proposed short haul haulage route shown in Fig 7.1 of the CMS (see 8.9 above) shows the construction site is approximately 10kms from Brewery Wharf. The CoCP<sup>21</sup> states that a local wharf should be within a 4km radius of the site. RBG is of the view that this should be amended to either a 2.5km radius or 5km by road. There is no alternative (shorter) route as the more direct Strategic Road Network (SRN) route via the A206 has a lorry ban at Romney Road in the World Heritage Site.
- 8.10 Additionally the cumulative effect of any movements of materials to or from the wharf to accommodate the constituent parts of the product supplied should be detailed. The sustainability of the whole supply chain needs to be a consideration.
- 8.11 Brewery Wharf is adjacent to the Greenwich Pumping Station in Norman Road and the Greenwich work site for the Thames Tideway Tunnel. The cumulative movement and crossover of heavy vehicles which the Scheme’s use of this site would cause is not, in RBG’s view, an acceptable alternative to wharves nearer the Scheme’s southern portal.
- 8.12 RBG would expect a prescribed Travel Plan for the workforce to be incorporated within the proposals. That Plan should ensure that the mode of travel distribution for the workforce is consistent with that for existing businesses located on the Greenwich Peninsula – reflecting the higher Public Transport Accessibility Levels (PTALs) that exist there. It

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<sup>20</sup> CMS Figure 7-1

<sup>21</sup> Code of Construction Practice Document [6.10] 3.2.4

should incorporate use of the river bus services. RBG will expect no commuter parking to be provided for construction workers.

- 8.13 The proposed (non 24 hour) working hours contained in the documents for Saturday hours (08:00 – 14:00) do not comply with RBG's of 08:00 -13:00 on Saturdays. Additionally RBG will be requiring full detail works permitted and proscriptio for the 'shoulder' periods.

## **9. PUBLIC TRANSPORT, WALKING AND CYCLING**

- 9.1 RBG welcomes the post consultation changes to the design to ensure that Boord Street bridge remains open to pedestrians and cyclists throughout the build programme. It is an important link dealing with the severance of the A102, and forms part of RBGs developing network of cycle routes and Quietways.
- 9.2 RBG welcomes the Mayor's announcement of the incorporation of cycling infrastructure improvements in the vicinity of the portals (within the Limits of Deviation) and requires agreed designs and implementation plans being incorporated into the DCO.
- 9.3 Likewise the inclusion of the introduction of a TfL funded cycle shuttle bus through tunnel needs to be incorporated into the DCO requirements. It is RBG's view that this should be developed to allow access for cyclists through the Blackwall tunnel. This would then provide an interim cycle route across the river pending the outcome of the feasibility study for a cycle ferry proposed by the Mayor. Silvertown's alignment is mirrored by the Emirates Air Line. Free use (to match the shuttle proposal) of the Air Line for cyclists should also be provided.
- 9.4 The proposed bus network which is shown in the documents and which has been used as part of the traffic model for the assessed case is not committed or funded by the DCO<sup>22</sup>. The Mayor's announcement that this would form part of TfL's 2016 Business Plan is welcomed, however until that is defined and secured it should not be assumed as a deliverable.
- 9.5 As stated earlier, RBG seeks the inclusion of a Bus Strategy as a DCO requirement.

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<sup>22</sup> LIR Paragraph 162 and following

## 10. ROAD SAFETY

- 10.1 TfL has set a London wide casualty reduction target of a 50% reduction on the 2005/09 baseline by 2020 (revised up from the previous 40% target in July 2015). RBG has already achieved a casualty reduction figure of a 53%.
- 10.2 A disproportionate number of remaining Killed and Serious Injuries (KSIs) occur on, or at interfaces with, the Transport for London Road Network (TLRN). The A102/A20 Kidbrooke Junction and the A206/A102 (roundabout) intersection are primary sites (the latter forms part of TfL's 'dangerous junctions review'). P2Ws and cyclists are particularly over represented<sup>23</sup>.
- 10.3 Over 16% of RBG's KSIs occur on, or at, junctions with the TLRN. The TLRN (the A2/A102, A20 and A206) comprise of only 5% of the roads in the Borough. The A102/A2 corridor accounts for approximately 1% of the Borough's roads.
- 10.4 Concerns around the timely implementation of works to address road safety on the Millennium Busway are already included in Section 8.3 and following. In addition the A2/A102 corridor accounts for approximately 7% of all collisions in the Borough with an average of 55 per year. However 11% of all Motorcycle collisions and 13% of all Motorcyclist KSI collisions are mainly clustered close to the Blackwall Tunnel approach and on and near all the major intersections along the corridor.
- 10.5 Although the recent introduction of average speed cameras on the A2/A102 corridor by TfL is welcomed as a contribution to addressing the issue of road safety on the A2, those cameras are not going to directly influence the slower speed collisions which are occurring on the tunnel approaches (A102) and at junctions which are already signal controlled. The LIR contains detail and analysis of the corridor<sup>24</sup>
- 10.6 The junctions on this corridor are already identified as under stress, and become more so in the assessed case model. Therefore the safety risk increases for users of the A102 and A2 corridor, as the compressed through put (and potential peak time increases in traffic flow) occur.
- 10.7 The new joining and leaving lanes introduced for the Scheme's links on the A102 increasing the approaches to 4 lanes. Given the collision data detailed above and in the LIR RBG's concern over the future safety of motor bike and scooter riders is particularly high.
- 10.8 It is RBG's view is that collision mitigation should not be dependent on the future Monitoring and Mitigation Strategy but should be fully addressed as part of the scheme's development.

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<sup>23</sup> LIR paragraph 191 and following

<sup>24</sup> LIR paragraph 178 and following

## 11. UNINTENDED CONSEQUENCES AND MONITORING & MITIGATION

- 11.1 Sections 4, 8 and 10 of this document outline some of RBG's concerns with the reactive strategies which TfL propose for monitoring and mitigation. These are detailed in the Local Impact Report<sup>25</sup>.
- 11.2 RBG welcomed TfL's original proposal to introduce a Community Fund which would allow the Host Boroughs to mitigate against unforeseen impacts of the proposals, and support schemes and initiatives that would improve air quality and the environment in the Host Boroughs.
- 11.3 RBG was of the view that the quantum of the Fund should be significant, related to the income generated through charges, should continue beyond 5 years after opening, and should be defined within the DCO.
- 11.4 The Fund has subsequently been omitted from the submitted DCO. RBG has seen no evidence to justify this and RBG would wish to see it reintroduced to the Scheme's mitigation proposals.
- 11.5 Arrangements for agreeing Monitoring and Mitigation triggers, with assured TfL funding for the timely implementation of required mitigations, and the inclusion of a hypothecated Community Fund to address unintended consequences are central to the Royal Borough's acceptance the Scheme. These again are discussed in detail in the Local Impact Report<sup>26</sup>.

## 12. THE ROLE OF STIG

- 12.1 TfL proposes to set up a Silvertown Tunnel Implementation Group (STIG). The function of this group is purely advisory. TfL's Board retains the responsibility for all decisions relating to the Scheme. The title of the group should be amended to one that reflects its true nature – for example replacing 'implementation' with 'advisory'.
- 12.2 Decisions within the group (for advice to TfL Board) are a majority decision by simple show of hands by each of those present. The composition of STIG proposed by TfL (even with the caveat of at least 2 host boroughs being present) leaves a situation where the three boroughs most affected by the tunnel(s) are able to be in a voting minority for decisions impacting their local highways. This arrangement is not acceptable to RBG in relation to decisions over its own roads where the Borough's view as Highway Authority should have precedence.

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<sup>25</sup> LIR paragraph 312 and following

<sup>26</sup> LIR Paragraphs 312

- 12.3 The current strategy suggests the trigger for mitigation or action is set by TfL with advice from STIG. Given the environmental consequences of a failure of TfL's traffic forecasts, it is RBG's view that triggers for action should be set in the DCO, and TfL should be placed under an absolute obligation to take action to ensure that traffic levels, and the resulting environmental impact, match that forecast by them in their application.
- 12.4 The review of monitoring and decisions on consequent actions (where necessary) should be undertaken with STIG meeting annually as a minimum. Interim, quarterly, reports should be supplied to the Host Boroughs, and a process agreed for TfL or Host Boroughs to call urgent interim meetings of STIG if required.