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The Planning Inspectorate

BY EMAIL

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15 November 2016

Dear Madam / Sir,

APPLICATION BY TRANSPORT FOR LONDON (TfL) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE PROPOSED SILVERTOWN TUNNEL

REF: TR010021

1. I write on behalf of ASD Limited (trading name Kloeckner Metals UK) and the UK subsidiary of Klöckner & Co.
2. ASD holds the freehold interest of a site in Thames Wharf, with an additional leasehold interest in the land adjacent to this, which is known as Instone Wharf. Currently this land is used for storage and distribution of metals. There are long-term ambitions for its residential-led redevelopment.
3. The site is marked in red on the site location plan included in **Appendix 1**.
4. TfL is proposing to temporarily acquire part of ASD's site, referenced as plot numbers 05-047, 06-010, 06-005 and 06-013, and also, post-completion of the tunnel, introduce a realigned access point from ASD's site from Dock Road.

Public Inquiry: notification

5. This letter and its appendices are submitted as the written representations to the Public Inquiry for the proposed tunnel, and will form the basis of the oral representations that we will make on our client's behalf.
6. We wish to formally notify the Planning Inspectorate of our intention to make oral representations at the following:
 - a. The Compulsory Acquisition Hearing (CAH) scheduled for 8 December 2016 and 20 January 2017;
 - b. The following Issue Specific Hearings (ISH):
 - i. Traffic/transport modelling 7 December 2016

ii. Traffic/transport modelling, forecasting and user charging and economic issues 17
January 2017

7. We also wish to notify the Planning Inspector that we would like to attend the Compulsory Acquisition Accompanied Site Visit on 20 January 2017.

Public Inquiry: written representations

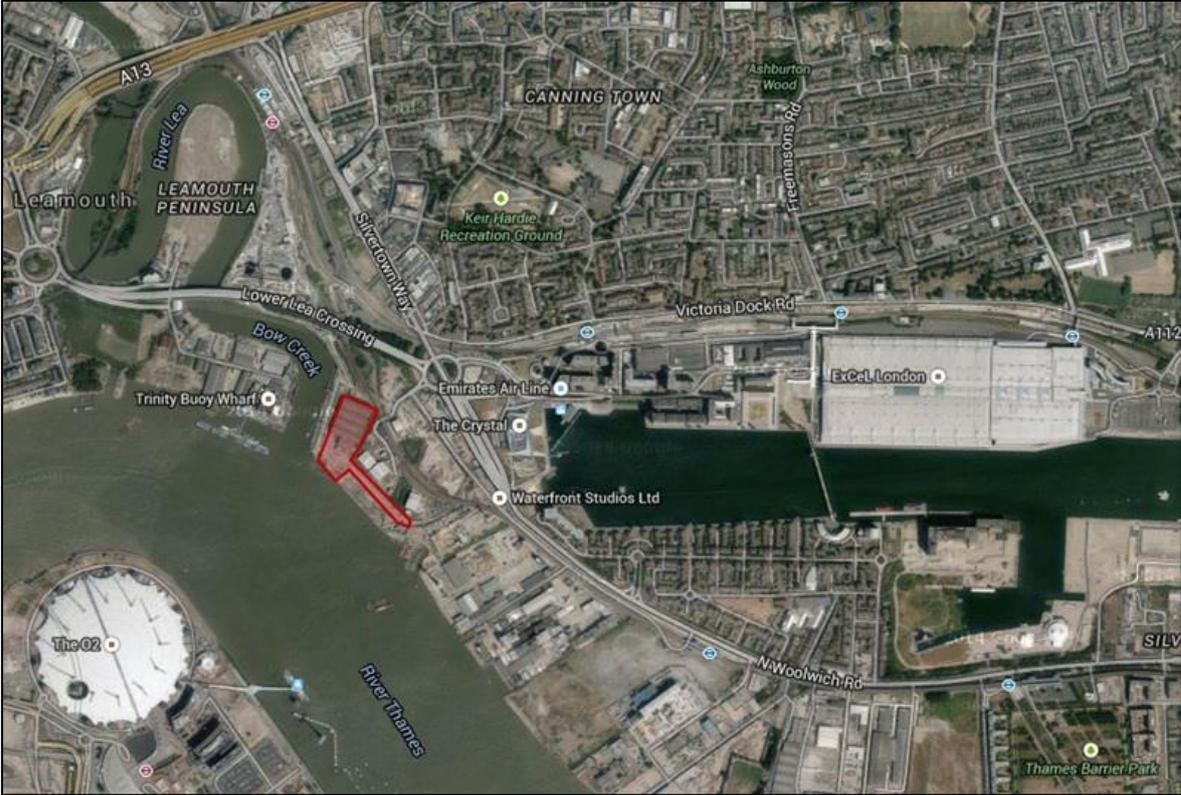
8. ASD supports general improvements to London's transport network, including the principle of a cross-river link, but has concerns relating specifically to the impact of the proposed tunnel on the current business.
9. While discussions between ASD and TfL are ongoing as to how these impacts are appropriately addressed, no agreement has been reached.
10. ASD instructed Steer Davies Gleave (SDG) to consider vehicular access and circulation associated with its site at Silvertown during and post- construction of the proposed Silvertown Tunnel. This technical note is included at Appendix 2 and forms the basis of our representations. It outlines in detail the very specific operational requirements of ASD, and explains how the business utilises its site as efficiently as possible in order to facilitate a successful business. It continues, assessing the implications of the temporary take of land and the potential implications of the realigned access to Dock Road post-completion and sets out what needs to be agreed in terms of access arrangements to ASD's site, if the business is not to be compromised.
11. Until such time as a mutually acceptable access layout is agreed with TfL and any such agreement has been made formally, then ASD's objection to the proposed Silvertown Tunnel remains.
12. If you have any questions or wish to discuss, please do not hesitate to contact Caroline Harper of these offices on 0207 852 4138. In the meantime I look forward to confirmation of receipt that these representations have been received and the comments noted.

Yours faithfully,

[signed electronically]

Caroline Harper
Associate Director – Planning, Development & Heritage
For JLL on behalf of

Appendix 1 – Site Location Plan



To	Caroline Harper, Stanley Booton (Jones Lang LaSalle)		
From	Steer Davies Gleave		
Date	15 November 2016		
Project	ASD Silvertown	Project No.	23055201

SILVERTOWN TUNNEL - REVIEW OF TEMPORARY AND OPERATIONAL VEHICULAR ACCESS TO ASD LIMITED'S SITE**Overview**

1. This technical note has been prepared by Steer Davies Gleave (SDG) on behalf of ASD Limited (trading name Kloeckner Metals UK) and considers vehicular access and circulation associated with ASD Limited's site at Silvertown during and post- construction of the Silvertown Tunnel.
2. This note should be read alongside a site map provided at **Appendix 3**.
3. ASD Limited is the freeholder of the Thames Wharf site, with an additional leasehold interest on the adjacent Instone Wharf. The land is currently used for short term storage, handling, processing and distribution of metals for the construction industry.
4. As part of the proposed Silvertown Tunnel works, Transport for London (TfL) is seeking to close the existing access via Dock Road and utilise part of ASD Limited's site as a compound during the construction phase. A revised access arrangement is proposed in the permanent situation associated with the realignment of Dock Road.
5. Over the past year, TfL and ASD have explored various temporary mitigation options with alternative access and storage layout proposals , including links crossing the DLR viaduct to the north-west of the site, and access via Scarab Close. Options to cross under/over the DLR viaduct north-west of the site were not considered feasible due to a lack of adequate high clearance, and would create an issue of lorries arrive at the wrong end of the site, having to traverse the site for parking.
6. Both parties are agreed that temporary access via a secure access point on Scarab Close is, in principle, the most feasible option, however ASD still has concerns relating to the impact of this access point on business operations. The purpose of this note is to set out those concerns and to inform the design of a mutually acceptable access option.

Current Operation

7. The site supplies steel and metals to a variety of industry sectors including construction throughout the South East of England. They specialise in offering an as required, 'just-in-time' basis, giving ASD a trading advantage over their competitors. The site location close to the strategic road network but convenient for central London is relevant to their business operation.
8. The layout of the site is also optimised for 'just-in-time' operation, with a flat site providing flexibility in operation. The linear access and storage arrangement means that various functions are segregated in an orderly fashion in accordance with good health and safety practice. This leads to a minimum of vehicle reversing on site and enables ASD to process orders quickly.
9. The site operates on a 24 hour basis. Steel is predominately delivered direct to site on specialist lorries, by ASD's major suppliers who are the large steel mills. That said, a significant proportion of additional supply to the site comes from ASD's Bulk Central Stock facility in Leeds, albeit at a significantly higher cost. The longest standard length of steel is 18.3m, therefore the lorries can be up to 22m long including the trailer. All ASD deliveries are checked in and held on the access road **(point A on site map)** on arrival and directed into the site when they are to be unloaded for storage or processing.
10. Other specialist metal suppliers also deliver to the site on a regular basis. Upon arrival these deliveries are also checked in on the access road. Lorries will then typically go to the weighbridge in the centre of the site **(point B on site map)**. Vehicle are weighed, then the steel is taken off the lorry using overhead cranes for storage or processing. Sideloaders are also used dependent on type of product.
11. Sideloaders pick up pre-organised bundles from the flatbed lorries, which are centrally balanced on the sideloaders. As the sideloaders are approximately 5m in length, the steel bundles typically protrude out of either end by up to 6.65m. Specialist lengths can extend to 22m or more and would also be handled by the side-loaders, with associated extended overhangs.
12. Sideloaders cannot turn on slopes with such long loads, and visibility from the cab is poor. Drivers cannot easily see what is going on behind the side-loader, therefore reversing of sideloaders is kept to an absolute minimum, aided with a banksman as necessary. In a forward direction there is significant risks from blind corners and right angle joining of circulation routes due to the long overhangs.
13. Some steel is offloaded to the linear storage area on the entrance approach to the site or in the main storage area at the north of the site **(point C on site map)** whilst others are processed immediately on delivery. Steel that is being processed is transferred to operation sheds towards the north of the site. Various functions take place within the sheds, including cutting and finishing of the steel to customer requirements. A beam crane is used to move steel around internally, with overhead cranes required to transfer stock back onto lorries with the assistance of side loaders.
14. As noted above, to the north west of the main storage sheds, a gantry crane is currently being constructed between the processing shed and the wharf edge **(point D on site map)**. This area was temporarily unavailable to ASD for use by the Crossrail construction project. It is used for

storing steels, though this is limited as of November 2016 due to construction of the new gantry crane handling and storage system.

15. All handling is subject to strict health and safety controls managed by the company in accordance with its internal safe system of work (SSW). A principal concern with any alternative handling arrangement will be circumstances that involve steel being moved such that front of loads are conflicting with other routes at (or close to) 90°. ASD would not consider any breaches of its internal SSW relating to steel being moved at 90°.

Temporary Access via Scarab Close

16. Whilst the current access route is unavailable during construction, TfL and Atkins have drawn up proposals for a temporary access via Scarab Close, whereby vehicles travelling to the ASD site would pass under the DLR viaduct on Scarab Close before using a temporary road running adjacent to the eastern face of the storage sheds (**point E on site map**). This road would provide access to the ASD forecourt, and would be secured with a lockable, manned gate at its northern extent.
17. In addition a 2600m² strip of land is proposed to be provided for storage of steels and a gantry loading area, accessed from the temporary road alignment between Scarab Close and the ASD forecourt (**point F on site map**).
18. In principle, ASD accept that temporary access via Scarab Close is the suitable solution during the construction works, however there remain issues with this option which will have a detrimental impact on their operation as currently proposed:

Sideloader operation

19. Sideloaders can only operate on level surfaces when carrying stock, and can only reverse or operate when handling long steels in a linear site layout with the aid of a banksman. The proposed levels and change of gradients on the temporary road (**point E**) would be too steep for sideloaders to operate safely. Moreover, the requirement for a sideloader to make a sharp turn into the temporary road is considered to be unacceptable from a safety perspective and therefore stock transfer between the temporary storage area (**point F**) and the ASD forecourt and main storage sheds (**points B and C**) would not be possible using sideloaders as per current arrangements, reducing the efficiency of the operation.

Reversing

20. Due to the non-linear layout of the temporary proposals, it is anticipated that lorries will have to carry out additional reversing moves to complete the process of entering the site, dropping off stock, picking up stock and leaving the site. Banksman are used to guide reversing vehicles and an increase in reversing will result in a requirement for additional banksman support, which has a staffing cost implication.

Parking provision

21. The currently proposed access options via Scarab Close will result in the loss of some on-site lorry parking for vehicle turns. The parking spaces on site are heavily utilised, and any loss of parking

space would be detrimental to the business. An optimal design would result in no loss of parking spaces for HGVs and staff vehicles; alternative off-site storage may otherwise be required.

Vehicle stacking

22. ASD have advised that it is common to have four or five HGVs waiting on the access road within their site during busy periods (typically mornings) to drop off/pick up steel. At present, lorries wait on the approach route to the main handling area off of Dock Road (**point A**), however this land would be obtained by TfL under the proposals.
23. Any reduction in this on-site handling capability that is not replicated in the new arrangements has the potential for adding difficulties to operations. ASD wish to understand further details on the capacity of the temporary proposals to accommodate surplus stacked lorries whilst waiting to service the site before confirming the acceptability of the current proposals.

Post completion of Silvertown Tunnel works

24. Following completion of the Silvertown Tunnel works, ASD would wish to revert to using their current entrance from Dock Road, as this would mean they can revert to the current linear stock handling and production arrangement, which is less staff-intensive and safer. As a result, it is important that the access via the realigned Dock Road works well and trucks can easily turn right into the current access road. The current TfL and Atkins plans introduce a more acute junction than the current layout that could potentially impact on the flexibility of the access and the ability of long loads to access the site.
25. As such, ASD Limited wish to be reassured that the realigned access point from Dock Road is suitable for all vehicles accessing the ASD site; in particular, lorries carrying long loads.

Summary

26. The revised arrangement using Scarab Close is agreed as offering a feasible option for temporarily accessing the ASD site. However, along with the revised storage facility required to accommodate the loss of land during construction, as currently designed it compromises the current site operations and increases the amount of double handling and the amount of reversing manoeuvres, with significant safety concerns and as a minimum extra banksmen required.
27. Due to the reduction in site size and flexibility for on-site storage, more stock would need to be kept remotely at their Leeds site and transported down to London when required, with attendant cost implications.
28. ASD are willing to consider compromised arrangements associated with these matters during the construction of the Tunnel, provided designs are developed to be acceptable and they are suitably compensated by TfL for additional costs associated with necessary residual mitigation measures.
29. ASD are keen to continue to work with TfL to finalise the design of the temporary access road from Scarab Close but cannot lift their objection to the compulsory purchase of land until a mutually acceptable access layout has been agreed.

30. In regard to the permanent situation, further details and potential design amendments are sought on the realigned Dock Road access to avoid constraints on long load manoeuvring.

APPENDIX 3

ASD Silvertown – Site Map illustrating Scarab Close Access Proposal

