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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 ExCeL London Ltd ('ExCeL').
2. ExCeL operates the ExCeL Exhibition Centre London on Victoria Dock Road. ExCeL welcomes transport improvements which support and improve the resilience of east London's road network, particularly in relation to the Blackwall Tunnel. We agree that transport improvements are needed in order to support economic and population growth across the Royal Docks and wider east London area, and support the principle of providing additional cross-river links.

**Public Inquiry: notification**

3. 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.
4. We wish to formally notify the Planning Inspectorate of our intention to make oral representations at the following:
  - a. 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

**Public Inquiry: written representations**

5. ExCeL's concerns relate to the potential impacts of the proposed tunnel on local traffic congestion across the wider highway network, and whether the impacts have been considered in sufficient depth to determine whether ExCeL will be detrimentally affected.
6. No formal agreement has been made with ExCeL to provide comfort as to how the tunnel's construction will ensure 'business as usual', either during construction or post-completion.
7. ExCeL therefore instructed Peter Brett to review TfL's Transport Assessment. This technical note is included at Appendix 1 and forms the basis of our representations. It concludes that the transport assessment information currently provided is strategic in nature, lacking specific localised detail. This makes it difficult to properly determine the impact of the tunnel on the ExCeL Estate, either during construction or post-completion. Recommendations are made as to appropriate analysis and scenario testing.
8. We also respectfully request that ExCeL is party to the timing and location of any road closures / diversions.
9. 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**

## TECHNICAL NOTE

**Job Name:** Silvertown Tunnel

**Job No:**

**Note No:** TN001

**Date:** 11/11/16

**Prepared By:** E Moran

**Subject:** **Silvertown Tunnel: Statutory Consultation on a proposed application for development consent under section 42 Planning Act 2008**

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### 1. Introduction and Background

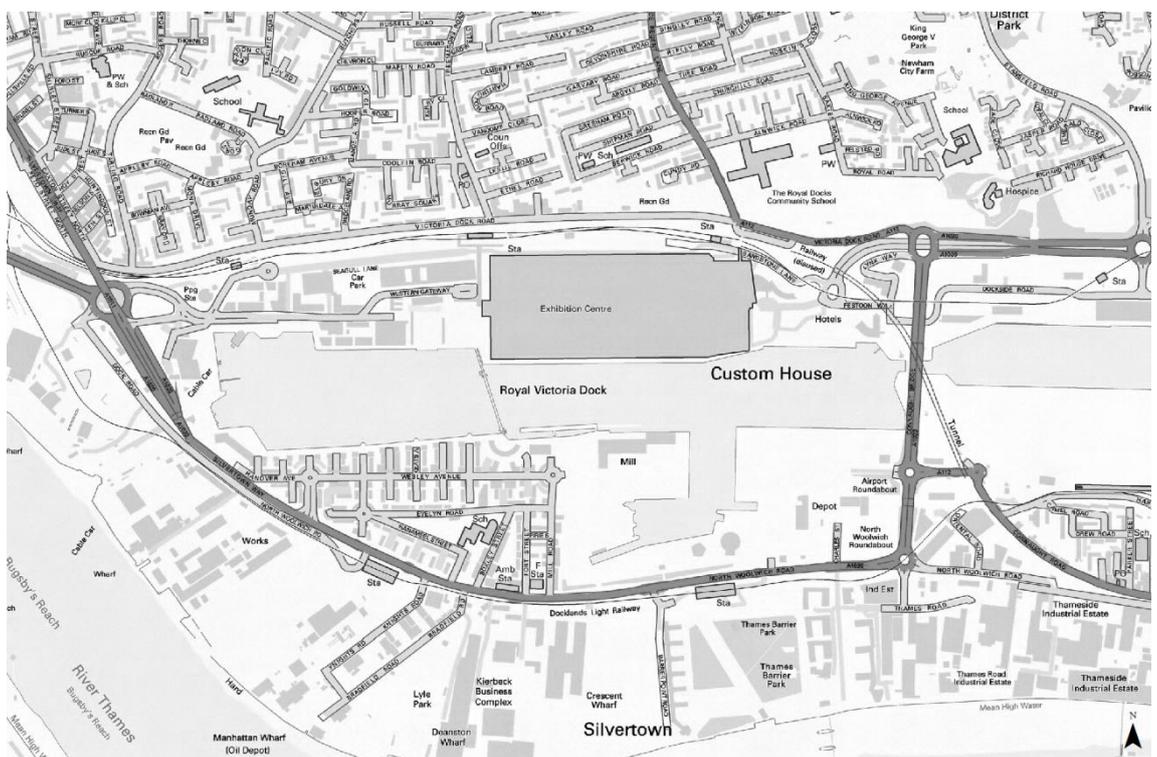
- 1.1 ExCel London Ltd (ExCel) operates the ExCel Exhibition Centre London on Victoria Dock Road and Peter Brett Associates LLP (PBA) has been instructed to provide comments on behalf of ExCel regarding the potential transport impact on the exhibition centre arising from the Silvertown Tunnel proposed river crossing.
- 1.2 The main purpose of the new Tunnel is to relieve traffic congestion and improve reliability at the existing Blackwall Tunnel by providing an alternative river crossing route between the Royal Docks and Lower Lea Valley area and Greenwich Peninsula. The following Scheme objectives are identified in the transport assessment:
- to improve the resilience of the river crossings in the highway network in east and south-east London to cope with planned and unplanned events and incidents;
  - to improve the road network performance of the Blackwall Tunnel and its approach roads;
  - to support economic and population growth, in particular in east and south-east London by providing improved cross-river transport links;
  - to integrate with local and strategic land use policies;
  - to minimise any adverse impacts of any proposals on communities, health, safety and the environment;
  - to ensure where possible that any proposals are acceptable in principle to key stakeholders, including affected boroughs;
  - to achieve value for money and, through road user charging, to manage congestion.
- 1.3 The Silvertown Tunnel scheme involves the construction of a twin bore road tunnel providing a new connection between the A102 Blackwall Tunnel Approach on Greenwich Peninsula (Royal Borough of Greenwich) and the Tidal Basin Roundabout junction on the A1020 Lower Lea Crossing / Silvertown Way (London Borough of Newham). The scheme incorporates the introduction of free-flow user charging on both the Blackwall Tunnel (northern portal located in London Borough of Tower Hamlets) and at the new Silvertown Tunnel. The charge is proposed as a mitigation measure to restrict the amount of new

traffic that may be generated by the introduction of additional highway crossing capacity and thus play a fundamental role in managing traffic demand. The charge will also support the financing of the construction, maintenance and operation of the Silvertown Tunnel.. The new tunnel has been designed to better accommodate buses and building the tunnel will allow better bus connections across the river in this area.

- 1.4 The Transport Assessment (TA), Document Reference 6.5, provides information on the forecast operation of the scheme and the transport impacts on the travel networks in the vicinity of the scheme. In general the predicted outcomes indicate that the proposed scheme is likely to achieve the stated objectives and ExCel welcomes transport improvements which support and enhance the resilience of east London's road network, particularly in relation to the Blackwall Tunnel. ExCel are however concerned that the continued operation of the exhibition centre particularly during the construction phase has not been considered in the development of the proposals. ExCel is concerned about potential transport impacts, and whether these have been considered in sufficient detail in order to determine whether ExCel will be detrimentally affected.

## 2. Excel Exhibition Centre

- 2.1 The Excel exhibition centre is located on the northern bank of the Thames on the North side of the Royal Victoria Dock and it is accessed by road via Seagull Lane and Sand Stone Lane. Visitors to the exhibition centre and staff have a range of public transport options available to them including the DLR buses and the Emirates cable car. Active travel modes are also accessible via segregated footways and cycle paths. However, road access is very important as ExCel need to be able to provide access for everyone, including those with mobility problems and deliveries and servicing are key to the success of the centre. The highway network in the vicinity of the ExCel Exhibition Centre is shown below.



2.2 The parts of the road network that are key to access to the ExCel exhibition centre are:

- The tidal Basin Roundabout to the west
- The Connaught Roundabout to the east
- Seagull Lane and Sandstone Lane
- The Connaught Bridge
- A1020 North Woolwich Road/Silvertown Way.

2.3 Additional congestion on this part of the highway network will have a detrimental impact on the operation of the exhibition centre and the following comments relate mainly to the potential for increased congestion in the area.

### **3. Supporting Documentation and Underlying Analysis**

3.1 The TA provides the majority of the transport analysis for the operational state of the scheme. The Construction Code of Conduct, Document Reference 6.10, provides an outline of the intended management of the construction process.

3.2 The TA and other supporting documents are based on a strategic assessment using bespoke transport models (RXHAM and Vissim). The modelling is used to demonstrate that the main effect is in the form of significant improvement in the performance of the strategic corridor in the study area and beyond, with little change in the levels of demand expected within the strategic area. These strategic simulations show no/little change in delay in the AM, PM and inter peak at local junctions in the vicinity of ExCel.

### **4. Gap Analysis**

#### *Impacts of the tunnel*

4.1 The simulations presented at this stage are useful to gain an understanding at a very high level. It is however unclear how ExCel may be affected by the scheme, despite some of these issues having been raised previously (Letter to TfL Consultation Delivery Team from Jones Lang LaSalle Ltd dated 29 November 2015). The outputs provided in the reports do not show details of the junction operation on non-strategic roads, such as those in the vicinity of ExCel.

4.2 In order to understand the operation of the network, specific junction assessments to show queues and delays are required on the following local junctions:

- Victoria Dock / Prince Regent Lane A112;
- Silvertown Way / Tidal Basin Road;
- Dock Road / North Woolwich Road / A1020 Connaught Bridge;
- Connaught Bridge / A112 Connaught Road;
- Connaught Roundabout.

The assessment will provide an indication of the performance of the junctions with the reassigned traffic and provide an indication of whether there is likely to be a detrimental effect on ExCel's core business, and if journey times are likely to become less reliable.

4.3 The assessment process will significantly benefit from local junction assessments at the above locations and additionally with the specific sensitivity testing scenarios below:

- Inclusion of an ExCel event;
- Incorporation of and ExCel event and one at the O2;
- Simulation of closure / incident;
- Interaction with London City Airport flows and effect of the airport expansion.

- 4.4 This assessment will give an indication of the likely effect on local roads and provide comfort to ExCel that the performance of the local road network will not be significantly reduced. It is important to ExCel that the journey to/from the venue for both visitors and staff is as efficient and quick as possible. This is because the journey to the venue forms part of the overall visitor experience and contributes to the reputation of the venue and the likelihood of visitors returning. The success of the ExCel business is also dependent on attracting high quality staff and their journey to and from work is important in recruitment and retention.
- 4.5 It is unclear why the HGV movements are the same for all periods assessed. Given the height restrictions in the Blackwall Tunnel, this may not be significant for the baseline, however, given that the proposed Silvertown Tunnel will be able to accommodate large vehicles (even double-deck buses) this may have a small detrimental effect on the local network as the composition of flows changes accordingly. This may mean that the impact on the local network is underestimated by the transport assessment.

*Construction impacts*

- 4.6 In terms of the construction impacts, two broad areas are envisaged: (a) the tunnel itself and (b) the revised gyratory at the Tidal Basin junction where the northern end of the tunnel will meet the road network. Both aspects will require traffic management. Details are not available at this stage but they are likely to cause congestion as traffic is temporarily reassigned / delayed. It is unclear how the measures implemented will affect the local highway network and how this will, in turn, impact on journey times to/from ExCel.
- 4.7 The design of the elongated Tidal Basin roundabout will rationalise various movements in the area. The associated bridge will also be redesigned and realigned. It is likely that traffic management will increase congestion on local roads but this has not been investigated in detail. Non-motorised road users will be diverted, resulting in longer journey times and the possible temptation to join main carriageway routes which would appear to be more direct than following the diversion, or dissuade them altogether from these modes. This could lead to a safety issue for all road users but will also have an effect on modal choice for people going to/from ExCel.
- 4.8 Traffic management associated with the construction of the tunnel will put pressure on the Connaught Roundabout and Connaught Bridge (both already recommended for local in-depth assessment). The effect of temporary road closures has not been studied locally and thus there is no indication of how these will affect journey times to and from ExCel or on event management.
- 4.9 Current timing suggests that construction is envisaged after the completion of the Thames Tide Tunnel (Beckton). There is no evidence of a contingency if both schemes overlap. Should this occur then planned HGV routes may become congested. This eventuality should be considered in the CTMP.
- 4.10 The TA suggests that construction traffic routes will not utilise Seagull or Sandstone Road. Should congestion occur on the HGV routes then there is a possibility that other traffic, not

controlled by the CCTMP may use Seagull Lane and Sandstone Lane as an alternative route and this may in turn have a negative impact on the operation of ExCel.

- 4.11 The Construction Code of Practice indicates that all these issues will be dealt with as part of the Construction Traffic Management Plan, which will be produced by the contractor for each worksite.

## 5. Conclusions

- 5.1 The transport assessment information provided at this stage is strategic in nature and as such is not adequate to show the likely impact of the proposed Silvertown Tunnel on the Excel exhibition centre in terms of the local highway network.
- 5.2 It is recommended that further analysis is undertaken earlier than envisaged in the Construction Code of Practice, to determine a) how the implementation of the scheme will affect the local highway network in the vicinity of the venue b) whether it is likely to have a detrimental impact on journey times to/from the venue and c) so that appropriate mitigation measures can be designed if necessary. This is particularly important in the scenarios detailed above.
- 5.3 A decrease in network performance and increase congestion has an effect on journey times and reliability for all modes and these effects increase costs and risk for businesses that rely on the highway. ExCel is therefore concerned at this stage that the potential impacts on the highway network have been considered in insufficient detail to determine the likelihood that ExCel's core business will be detrimentally affected.

## DOCUMENT ISSUE RECORD

Technical Note No	Rev	Date	Prepared	Checked	Reviewed (Discipline Lead)	Approved (Project Director)
Job No/Brief/TN001	-	14.11.16	EM/MT	MT		
Job No/Brief/TN001						

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