



Silvertown Tunnel Development Consent Order

London Borough of Lewisham

Comments on Relevant Representations

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1. INTRODUCTION

- 1.1 This document provides London Borough of Lewisham's ("LB Lewisham") comments on some of the Relevant Representations submitted by neighbouring and host local authorities and other statutory consultees to highlight to the Examining Authority where there are overlaps with LB Lewisham's concerns on the Silvertown Tunnel proposal. It is not an exhaustive list of comments and focuses on those boroughs and statutory consultees with the most similar concerns to LB Lewisham.
- 1.2 It sets out brief comments on the following Relevant Representations;
- Royal Borough of Greenwich
 - London Borough of Tower Hamlets
 - London Borough of Bexley
 - London Borough of Southwark
 - London Borough of Hackney
 - Public Health England.

2. LB LEWISHAM'S COMMENTS ON RELEVANT REPRESENTATIONS

INTERESTED PARTY	SECTION OF RELEVANT REPRESENTATION	LONDON BOROUGH OF LEWISHAM'S COMMENTS
LOCAL AUTHORITIES		
Royal Borough of Greenwich (host borough)	The Relevant Representation refers to the "assessed case" model as still not agreed as adequate for travel forecasting and that it provides insufficient confidence of predictions of traffic movements.	LB Lewisham support this point
	The Relevant Representation refers to concerns about environmental impacts including air quality.	LB Lewisham support Greenwich's point and is also concerned about negative impacts on air quality.
	<p>The Relevant Representation refers to the concerns below;</p> <p>"The traffic model and associated traffic impact forecasting, particularly the 'compaction' of the southbound pm peak southbound through increased capacity which effectively increases queuing on the local network where junctions are already at or near capacity."</p> <p>"A lack of confidence in the validity of the output from the tested sensitivity scenarios arising from a lack of confidence in the assessed case model".</p>	LB Lewisham agree with this and have concerns about the suitability and accuracy of the model / modelling process
	<p>The Relevant Representation refers to the concerns below;</p> <p>"The absence of assurance that the bus routes, on which socio-economic benefits are predicated, are an integral part of the proposal".</p>	LB Lewisham supports this comment and also is concerned about the lack of committed bus routes.

	The Relevant Representation refers to the concerns about the absence of arrangements to support cross-river movement of pedestrians and cyclists.	LB Lewisham shares this concern.
London Borough of Tower Hamlets (host borough)	The Relevant Representation welcomes the proposals for the Silvertown Tunnel Implementation Group (STIG) as essential fundamental mechanisms to deal with the outcomes of the monitoring strategy.	LB Lewisham supports the principle of this comment, also welcoming the principle of STIG, but has concerns with the detail of its structure, implementation and review.
	The Relevant Representation refers to concerns that improved public transport bus services are not guaranteed even though they are integral to the Transport Assessment.	LB Lewisham support this point.
	Tower Hamlets raise concern that there are not proposals for improving cross river provision for cyclists.	LB Lewisham support this point
	Tower Hamlets state that; "The membership and operating arrangements of the STIG need refining"	LB Lewisham share this concern.
London Borough of Bexley	Bexley raises concern about the extent of the proposed monitoring and the mitigation of traffic impacts. It refers to the assumptions within the model based on future growth aligned to the Further Alterations to the London Plan but that Bexley and other boroughs anticipate growth greater than that in the FALP. It refers to such growth may result in less spare network capacity than that assumed by TfL and that this could have a noticeable impact upon the free-flow of traffic on the network.	- TfL have done a high growth scenario to sensitivity test the impacts, however, it seems that the high growth is only as high as FALP so if growth is considered higher then it would be inadequate. We have provided figures to TfL of the projected housing numbers and asked them to clarify they are included in the testing
London Borough of Southwark	Southwark's Relevant Representation states; "At present the council has significant concerns on the impact of Silvertown tunnel on Southwark's two free river crossings Tower Bridge and Rotherhithe Tunnel and the impact on of increased congestion and air pollution in these areas."	LB Lewisham agrees with Southwark's concerns on the impact of increased congestion and air pollution. LB Lewisham reiterates Southwark's concerns that traffic may be directed to the Rotherhithe Tunnel as it will remain the

		only crossing not subject to either a toll or London congestion charging east of Vauxhall Bridge if charging is imposed at Blackwall Tunnel and Silvertown Tunnel.
London Borough of Hackney	Hackney raise concern about the uncertain benefit to public transport and lack of benefit to pedestrians and cyclists. The Relevant Representation refers to the proposal being a missed opportunity to improve cross-river connectivity for cyclists and pedestrians.	LB Lewisham agree with Hackney's comments expressing concern about the bus routes only being indicative and about the missed opportunities for cyclists and pedestrians.
OTHER STATUTORY CONSULTEES		
Public Health England	Public Health England recommends that "the proposal ensures that the local overall air quality is not worsened. PHE would encourage any new road or traffic development to consider, if practical and cost effective, opportunities to secure improvements in local air quality".	LB Lewisham agree that the choice of receptors assessed does not adequately ensure that overall air quality is not worsened. This is compounded by there being no detailed assessment of impacts in neighbouring boroughs, including Lewisham.
	The Relevant Representation refers to the scheme appearing neutral in terms of increasing rates of physical activity through modes of active transport. It also refers to the project being a very intense use of resources aimed entirely at one mode of transport and that alternative modes of transport which promote more active travel do not seem to have been considered and opportunities may have been missed.	LB Lewisham agree that the focus on a single mode of polluting travel, emissions from which will increase with the scheme, does not align with the concept of 'air quality neutrality', whether or not TfL argue that this isn't required by policy.
	The Relevant Representation states; "The proposer has utilised Defra baseline modelling data from 2012 alongside traffic data from the same year to compare against the reference (without scheme) and assessed (with scheme) cases when operational in 2021 but provides limited justification for using that baseline year. Hence PHE is seeking clarity as to the reasoning behind selection of this year and	LB Lewisham appreciate that TfL's use of earlier data represents an attempt at a worst-case assessment. However, this highlights the inadequacies of the air dispersion model inputs and makes the use of the DMRB screening criteria woefully inadequate.

	why a more recent year was not selected to be representative of current air quality."	
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