

Statement of Common Ground between Transport for London and London Borough of Lewisham

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Silvertown Tunnel

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1. Introduction

1.1 Purpose of the document

- 1.1.1 This Statement of Common Ground (SoCG) is submitted to the Examining Authority in relation to the application by Transport for London (TfL) under section 37 of the Planning Act 2008 (the Act) for an order granting development consent for the construction of the Silvertown Tunnel (“the Scheme”).
- 1.1.2 The Examining Authority has requested a SoCG between the two parties on three issues; 1. air quality, 2. traffic modelling and forecasting and 3. traffic monitoring and mitigation.
- 1.1.3 The aim of this SoCG is therefore to provide an update on matters which the two parties agree and matters where agreement has not yet been met in relation to these specific issues.
- 1.1.4 The statement seeks to ensure that the Examining Authority is aware of the material differences between the two parties. Where appropriate it also briefly covers the other issues that LB Lewisham has raised in their submissions. It does not comment on matters outside of Lewisham’s submissions.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This Statement of Common Ground (SoCG) has been jointly prepared by TfL and the London Borough of Lewisham (LB Lewisham). It sets out matters at this point in the DCO examination process which are agreed between both parties and matters which are not agreed.

1.3 Structure of the Statement of Common Ground

- 1.3.1 This SoCG comprises five sections:

Section 1 is an introduction to the SoCG and the Scheme;

Section 2 provides an overview of consultation to date between TfL and LB Lewisham;

Section 3 provides a list of matters agreed;

Section 4 provides a list of matters not agreed; and

Section 5 contains the parties' signatures.

1.4 The proposed scheme

- 1.4.1 The 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 Silvertown Tunnel will be approximately 1.4km long and will be able to accommodate large vehicles including double-deck buses. It will include a dedicated bus, coach and goods vehicle lane.
- 1.4.2 The Scheme also includes the introduction of free-flow user charging at both the Blackwall Tunnel (northern portal located in London Borough of Tower Hamlets) and the new Silvertown Tunnel.
- 1.4.3 On the north side, the tunnel approach road connects to the Tidal Basin Roundabout, which will be altered to create a new signal-controlled roundabout linking the Silvertown Way, Dock Road and the Lower Lea Crossing. Dock Road will be realigned to accommodate the new tunnel and approach road. On the south side, the A102 will be widened to create new slip road links to the Silvertown Tunnel. A new flyover will be built to take southbound traffic exiting the Blackwall Tunnel over the northbound approach to the Silvertown Tunnel. The Scheme includes minor changes to Tunnel Avenue including the removal of the bus-only gate allowing access for all vehicles between Blackwall Lane and Ordnance Crescent. The Boord Street footbridge over the A102 will be replaced with a pedestrian and cycle bridge.
- 1.4.4 New portal buildings will be located close to each tunnel portal to house the plant and equipment necessary to operate the tunnel.
- 1.4.5 TfL propose that the main construction works could commence in late 2018 and will last approximately 4 years with the new tunnel opening in 2022/23.

1.5 Introduction to London Borough of Lewisham

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- 1.5.1 This SoCG is between TfL and LB Lewisham. LB Lewisham is an inner London Borough located south-east of central London. For the purposes of the Silvertown Tunnel scheme the LB Lewisham shares a boundary with the Royal Borough of Greenwich where part of the scheme is located and therefore they are considered to be a 'neighbouring borough' for the purposes of the application.

2. Overview of key correspondence and meetings

2.1 Key correspondence and meetings

2.1.1 A summary of the key meetings and correspondence that has taken place between TfL and London Borough of Lewisham is outlined in the table below.

Date	Form of correspondence	Key outcomes and points of discussion
15-Oct-14	Email from TfL to LB Lewisham	Invite to LB Lewisham to respond to 2014 consultation on the Scheme
19-Dec-2014	Letter from LB Lewisham (Consultation response)	2014 consultation response from LB Lewisham. Key issues raised: <ul style="list-style-type: none"> • Location of crossing • Local traffic impact • User charge
28-Jan-15	Meeting	Overview of 2014 Silvertown consultation results, Silvertown traffic impacts and charging issues
09-Feb-15	Workshop given by TfL to all boroughs	DCO workshop - overview of winter 2014 consultation results, DCO application process as it relates to boroughs
13-Aug-15	Meeting	Scheme update, discussion of DCO process, traffic and charging in particular
02-Oct-15	Letter from TfL	Consultation letter (s42 (1)(abc)) inviting participation in consultation
21-23-Nov-2015	Email	Email discussion of motion tabled by Lewisham Council to oppose the Scheme.

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24-Nov-15	Email from TfL to LBL	A response, addressing/highlighting TfL's position on key points to Lewisham Council's draft motion: In particular: <ul style="list-style-type: none"> • Location of crossing • Traffic impacts and the suitability of the proposed location • Air quality/health impacts
27-Nov-2015	Letter from LB Lewisham	Statutory consultation response from LB Lewisham. Key points raised: <ul style="list-style-type: none"> • Traffic modelling and impacts • User charge • Environmental impacts
17-Feb-2016	Email from TfL	Update and provision of TfL board paper /decision to proceed to DCO and briefing note re responses received during statutory consultation.
22-Mar-16	Workshop	Interested Borough DCO workshop: project update; Borough involvement in DCO process; traffic modelling; traffic impacts; environmental impacts.
13-May-16	Email from TfL to LBL	Advertising the submission of DCO application to PINS and provision of links to documents. Included an offer of a meeting to talk through issues of interest to LB Southwark contained in the DCO documentation
9 Jun- 16	Meeting with LB Lewisham (including Project Centre and GVA).	In the meeting a project update was given. Follow up actions included TfL to provide LB Lewisham with access to the SDG traffic audit data, provide links to key information and set up further meetings to discuss the charge control mechanism.
12- July- 16	Letter (Section 56 notice)	Official S56 notice served to LB Lewisham, alerting to process and timeframe to register as an Interested Party in the Examination

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13-July- 16	Email from TfL to LB Lewisham	Email advertising the commencement of the Examination registration period and detailing the opportunity to submit a relevant representation.
14-July-16	Meeting with Project Centre, the transport consultants employed on behalf of Lewisham	In the meeting the mechanism of STIG and the charging strategy were discussed. It was agreed that a table of key issues and response would be compiled and sent to LB Lewisham.
17-Aug-16	Email from TfL	Table sent to LB Lewisham highlighting issues raised in their consultation response with TfL responses supplied.
25-Jul-16	Email from TfL to LB Lewisham	Follow up to 14 July meeting and offer of schedule of meetings
26-July-16	Email from TfL to LB Lewisham	Provision of Steer Davies Gleave (SDG) independent traffic model audit Base and Reference Case audit reports
08-Aug-16	Workshop led by TfL. Attended by LB Lewisham	Workshop session in which SDG outlined the outcomes of their traffic model audit
09-Aug-16	Email from TfL	Request for Lewisham to identify the specific growth areas of interest to the Borough with regard to traffic modelling
10-Aug-16	Email	Offer of a meeting following SDG audit presentation, to aid with development of Relevant Rep
17-Aug-16	Working table emailed by TfL to LB Lewisham	Provision of a table, for LB Lewisham's comment, detailing the key issues raised in the Boroughs consultation response and providing the specific TfL response to these.
24-Aug-16	Email	Reiteration of 09 August request for Lewisham to identify the specific growth areas of interest to the Borough with regard to traffic modelling

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5-Sep-2016	Correspondence via PINS (submitted 26-Aug-16)	<p>LB Lewisham Relevant Representation published on PINS; highlighting the main concerns to be:</p> <ul style="list-style-type: none"> • impacts on traffic congestion; • impacts on air quality and the health of the local community; • sustainable transport and connectivity; • the need for a package of river crossings; and • Consistency with planning policy.
14-Sep-16	Email from TfL	Email requesting a meeting with LB Lewisham to address points in Relevant Rep and commence drafting of SoCG in earnest
26-Sep-16	Email from LB Lewisham	Email introducing Phlorum, LB Lewisham's Environmental consultants and requesting a meeting to discuss air quality
28-Sep-16	Email from TfL	Email offering/agreeing a date to meet Phlorum to discuss Air quality
5-Oct-16	Meeting on Air Quality with EHO from Lewisham and consultant from Phlorum, Environmental Specialist.	Discussed the methodology used within the air quality assessment.
5-Oct-16	Email from LB Lewisham	<p>Request for information re model from Project Centre (Lewisham's traffic consultants)</p> <ul style="list-style-type: none"> • Validation report • Confirmation of the network included in the borough • Whether Sensitivity testing of the bus frequency through the tunnel has been carried out if the proposed high frequency is not realised

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7-Oct-16	Email/call from TfL to GVA.	Correspondence agreeing TfL to provide a full draft SoCG and LB Lewisham to meet and discuss any comments
10-Oct-16	Email	TfL response to Project centre traffic model questions of 5 Oct
17-Oct-2016	Email	First draft of SoCG submitted to LB Lewisham, for comment
25-Oct-2016	Meeting	Meeting with project centre and GVA acting on behalf of LB Lewisham and TfL. Meeting to discuss the draft SoCG and key issues.
28-Oct-2016	Email from Project Centre (Acting on behalf of LB Lewisham	Detailed comments and questions on the traffic modelling have been sent to TfL for response. Discussion is continuing.

3. Matters agreed

Ref	Description of matter	Details of agreement	Record of agreement
3.1 River crossings			
3.1.1	River crossings	It is agreed that the LB Lewisham support the principle of increasing transport capacity across the river in the east, but believes that there should be a package of crossings further east of the proposed Silvertown Tunnel.	In LB Lewisham relevant representation on 26 th August 2016.
3.2 Sustainable transport			
3.2.1	New bus capacity	It is agreed that the provision of bus services is welcomed in principle by LB Lewisham, but Lewisham remain to be assured that bus provision is appropriately secured and is not satisfied that currently proposed arrangements for planning services will ensure that LBL's needs are met.	Meeting on 25 th October 2016

4. Matters not agreed

4.1 Introduction

- 4.1.1 The matters below are a reflection of the current position of LB Lewisham and TfL; both parties are in agreement that discussion will continue on these matters over the course of the examination.
- 4.1.2 The description of LB Lewisham’s issue is taken from LB Lewisham’s Relevant Representation unless stated otherwise. Where appropriate LB Lewisham’s updated response cross refers to their Written Representation and/or Local Impact Report.

Ref	Description of LB Lewisham’s issue	Transport for London response	LB Lewisham’s updated response	Current position
4.2 Traffic congestion				
4.2.1	The tunnel would exacerbate rather than disperse the current pressures of traffic congestion especially as the proposed tunnel relies on the same southern approaches as the Blackwall Tunnel, including parts of the A2	As set out in the Transport Assessment (Document Reference 6.5), TfL’s analysis of the traffic effects of the Scheme has covered the entirety of the east and southeast sub-region of London (and beyond). TfL does not expect the	The council have serious misgivings about the accuracy and suitability of the modelling to accurately reflect the effect of the scheme on the key routes within the borough. The strategic nature of the model does not allow for the detailed consideration of specific junction / network operation. This is	In recent discussion both parties agree that the traffic modelling is key to understanding likely scheme impacts at a given level of charge. LB

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	<p>and South Circular.</p>	<p>Scheme to lead to a significant increase in traffic on the A102 and A2 and other key surrounding roads nearby and beyond - including the key routes serving the London Borough of Lewisham eg. A205, A20, as well as alternative crossings e.g. the Rotherhithe Tunnel. The proposed user charge would act as an effective tool for managing demand, such that we do not expect any overall increase in traffic, and the charge could be adjusted if necessary if the Scheme was having unanticipated adverse impacts on parts of the road network.</p>	<p>acknowledged by TfL in their TA and they carried out local models to address this but these were very localised around the tunnel approaches and did not include any of the network in Lewisham.</p> <p>The highway network in Lewisham is known to be under pressure, particularly with recently approved major developments on the A200 corridor in LB Lewisham and LB Southwark. The A200 is the main route on the south side to the free crossing at Rotherhithe</p> <p>The RCSHM states that (page 71 of 81) the interpeak period modelled journey times validates best against the observed data, with less congested routes, with 88% of the routes being within 15% and the total modelled journey times being close to observed. The AM and PM peaks do not meet the recommended guidance but are still considered acceptable given the strategic nature of the model. In</p>	<p>Lewisham remains to be convinced that the model performs appropriately.</p> <p>LB Lewisham is now awaiting the results of a sensitivity test in which journey times on routes in LB Lewisham are increased to better match congested conditions in this area, which TfL has offered as a means of addressing concerns over local validation.</p>
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			<p>general, the model has a tendency to underestimate some journey times, especially on very heavily congested routes. This strongly supports that detailed localised modelling would be required to understand the actual impacts of the scheme.</p> <p>The accuracy of the model is questioned and the ability of the user charge to effectively suppress demand to the level of the base case.</p> <p>We are aware that LB Greenwich (a host borough) is not satisfied with the modelling. As such LB Lewisham have serious concerns.</p>	
4.2.2	<p>LB Lewisham disagrees with TfL’s assessment of impacts on traffic and considers the scheme will have a more significant impact on Lewisham’s roads than</p>	<p>The model is strategic in nature and has been calibrated and validated against observed traffic count and journey time data covering the whole study area which includes the key routes</p>	<p>As above.</p>	<p>Refer to response in 4.2.1.</p>

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	<p>recognised by TfL. LB Lewisham understands that TfL’s findings show that the majority of Lewisham’s roads do not currently experience significant congestion – LB Lewisham strongly disagree with these findings based on its local knowledge.</p>	<p>within LB Lewisham. The transport Assessment includes an analysis of the flows on the road network relative to capacity (in the form of a series of VCR plots). These plots highlight significant points of congestion at a strategic level – however this should not be taken to mean that there are not other smaller pockets of locally significant congestion in LB Lewisham (or indeed elsewhere).</p>		
4.2.3	<p>LB Lewisham is yet to be provided with TfL’s transport model to enable LB Lewisham to assess the model and its impacts as projected by TFL. It is understood that TfL and its consultants (Steer Davies Gleave) have shown the draft model to the host boroughs</p>	<p>We do not intend to provide the model data itself, and no discussion as such has taken place previously. As requested by LB Lewisham TfL has provided the SDG audit reports for the base year and reference case models, and we are also aiming to provide the latest draft of the equivalent report for the Assessed Case</p>	<p>As above. We are aware that LB Greenwich (a host borough) is not satisfied with the modelling. As such LB Lewisham have serious concerns.</p>	<p>Refer to response in 4.2.1.</p>

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	and that once finalised it will also be shared with Lewisham and others. LB Lewisham therefore reserves the right to comment further once the model has been made available by TfL.	subject to agreement with the host boroughs who are the clients for that work.		
4.2.4	LB Lewisham’s current understanding is that the model does not take into account the cumulative effects of other development schemes including the Thames Tideway Tunnel and other major mixed use schemes in Lewisham and Canada Water. The model needs to account for these schemes during both construction and operation to fully assess the potential impacts on	The population and employment assumptions behind the Assessed Case scenario were agreed with the GLA and reflect their Further Alterations to the London Plan (FALP). Analysis of the modelled assumptions within LB Lewisham shows that the growth rates are, in general, greatest in those zones where development is expected (i.e. zones that fall within an Opportunity Area). Furthermore TfL have also undertaken a high growth	As above in general. The growth appears to only consider the ESR in detail and does not include the significant sites in LB Southwark. As such this is not reflecting the situation accurately and reduces confidence in the modelling.	Further discussion with TfL and LB Lewisham have clarified that growth (in accordance with Further Alterations to the London Plan (FALP) 2015 assumptions) has been taken account of, across the model area including beyond the ESR

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	the transport network.	scenario which considers a situation where development growth exceeds the FALP aspirations. Nonetheless TfL will be modelling a scenario that specifically considers the latest aspirations for the Canada Water site based on the information provided in the relevant representation submitted by British Land.		(LB Lewisham awaits detailed evidence of the growth assumptions used). Additionally, TfL is undertaking sensitivity testing to examine the impact of detailed development proposals at specific sites insofar as these differ from FALP assumptions.
4.2.5	As LB Lewisham has yet to see the transport model (and understand that model is yet to be finalised), it is difficult to establish whether the mitigation strategy is adequate. There needs to be a clear trigger level at which the	The concern about the inherent difficulty in predicting behavioural responses to user charging through the Assessed Case model is effectively addressed by the proposed Monitoring Strategy and Traffic Impact Mitigation Strategy (TIMS), in that TfL commits to undertake	The proposed structure of STIG as provided in the current DCO means that TfL does not need to accept STIG's position therefore undermining the purpose of STIG . Lewisham have not seen the trigger points developed with the host boroughs and as such cannot agree	Please refer to the update on discussions regarding STIG in response 4.4.1.

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	<p>measures within the mitigation strategy will come into force together with an ability for LBL to enforce any TFL breach.</p>	<p>monitoring and subsequently implement mitigation of actual impacts through adjustments to the user charges and/or other measures as necessary.</p> <p>TfL is refining this proposal by developing a set of specific triggers which will define when a red, amber or green status is activated. TfL has developed this process in liaison with the host boroughs (including the London Borough of Tower Hamlets). The triggers consist of a set of criteria which are sophisticated enough to be applied 'universally' across different locations. In addition to a number of fixed triggers, STIG will be able recommend to TfL that additional triggers are added on an annual basis to respond to concerns that</p>	<p>to their suitability at this stage.</p>	
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		emerge over time and to ensure the continued relevance and effectiveness of the triggers. TfL is currently developing the proposals based on its operational and monitoring experience of the London road network. Once finalised, the revised proposals will be submitted to the examination in the form of updated versions of the Traffic Impacts Mitigation Strategy and the Monitoring Strategy.		
4.2.6	LB Lewisham has concerns with TFL's view that an appropriate level of user charging will manage demand and mitigate impacts of the scheme. LB Lewisham considers that it will be extremely difficult to determine and consistently charge users at a level which	TfL has developed an Assessed Case which includes a set of initial user charges which are forecast to achieve the required demand management effect as assessed in the Transport Assessment and the Environmental Statement. It is acknowledged that conditions at the opening of the Scheme may differ, and	The proposed structure of STIG as provided in the current DCO mean that TfL does not need to accept STIG's position therefore undermining the purpose of STIG . The potential for mayoral intervention in user charging as provided by the draft DCO also means that user charging is likely to reflect political expediency resulting in user charging being unable to fulfil	See response in 4.4.1 regarding STIG. In discussion with TfL, LB Lewisham have reiterated their concern that the Charging Policy does not provide sufficient

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	will deliver the benefits TFL claim whilst not harming the East London economy.	for this reason TfL is proposing an adaptive policy which provides for the user charges (including variables such as the hours of charging and the discounts and exemptions) to be set closer to Scheme opening, and for variations to take place in future. This process, and the ways in which TfL will seek to ensure the Project Objectives are still delivered, is described in the Charging Policy. LB Lewisham will have a role in this process, along with other local boroughs, through its membership of STIG.	its proposed role of managing demand. There is known to be concern from one of the host boroughs about the charge, reflecting LB Lewisham concerns.	assurance that charges will continue to be applied in such a way as to effectively manage traffic demand, and that it is too open to political influence.
4.2.7	LB Lewisham has concerns that traffic will be directed to the Rotherhithe Tunnel as that will remain the only crossing not subject to	As stated in 5.1.1.TfL does not expect the Scheme to lead to a significant increase in traffic on the A102 and A2 and other key surrounding roads nearby and beyond –	The DCO provides no specific obligation for TFL to provide mitigation if the scheme results in increased traffic on the A102, A2 or the Rotherhithe Tunnel.	TfL have explained the charging strategy, STIG and the Traffic monitoring and mitigation

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	<p>either a toll or London congestion charging east of Vauxhall Bridge if charging is imposed at Blackwall Tunnel.</p>	<p>this includes the Rotherhithe Tunnel. The proposed user charge would act as an effective tool for managing demand, and could be adjusted if necessary if the Scheme was having adverse impacts on alternative routes and crossings including the Rotherhithe Tunnel.</p>	<p>As above re; concern over effectiveness of charge</p>	<p>strategy (TIMS) but LB Lewisham remain unconvinced that STIG and TIMS will effectively ensure that local mitigation if required is secured.</p>
<p>4.2.8</p>	<p>LB Lewisham understands that TfL are currently not proposing a local discount for user charges. If, in the future, TfL decide to apply a local discount, LBL would like to be part of discussions to ensure that the methodology for areas to qualify for a discount is fair and not simply based on borough boundaries.</p>	<p>As described in 4.1.6, TfL has developed an Assessed Case of user charges for the opening year which does not include a resident discount (the rationale for this is set out in the Charging Statement). LB Lewisham will be involved in setting the initial user charges (including any changes to discounts or their criteria) and in any subsequent variations through its membership of</p>	<p>The limitations of STIG referred to earlier apply.</p>	<p>See response in 4.4.1 regarding LB Lewisham's and TfL'S discussion on STIG.</p>

		STIG.		
4.3 Air quality and health				
4.3.1	The proposed tunnel will increase traffic volumes and congestion which is likely to reduce air quality further.	By addressing the congestion issues at the Blackwall Tunnel, the scheme is expected to have an overall positive impact on congestion, and (as stated in 5.1.1) is not expected to lead to a significant material increase in delay on any part of the road network. A user charge at both the existing Blackwall Tunnel as well as the new Silvertown Tunnel would manage demand to the extent that any additional users attracted by the improved crossing will be countered by a corresponding decrease in demand arising from the introduction of the charge. The combination of providing additional capacity	<p>LBL does not have confidence in the traffic data that are a fundamental input to the air pollution dispersion model used in the air quality assessment. As such, they cannot currently provide further detailed comment on the results presented in the ES.</p> <p>However, LBL is concerned with other aspects of the air quality assessment methodology, including the following issues:</p> <ul style="list-style-type: none"> Determining that the majority of receptors assessed in the host boroughs experience a negligible change in NO₂ exposure is not helpful as it does not put focus on the most significant impacts in pollution hotspots and areas of particular sensitivity to 	<p>LB Lewisham does not have confidence in the traffic data or the air quality assessment methodology.</p> <p>TfL have explained the methodology and approach to both topics but LB Lewisham remain unconvinced.</p>

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		<p>alongside the user charge will, in turn, manage the effects on the wider road network including secondary environmental effects.</p> <p>The air quality assessment has been undertaken following the relevant legislation and guidance. It concludes that the Scheme will not result in a significant effect on air quality. With regards to changes in nitrogen dioxide (NO₂), the assessment shows that the majority of receptors across the study area experience a change that is classified as imperceptible by the guidance. Where changes are classified as perceptible, more receptors will experience an improvement than will experience a perceptible deterioration.</p> <p>Please see Volume 1,</p>	<p>poor air quality (this concern has also been raised in Public Health England's RR)</p> <ul style="list-style-type: none">• TfL appears to have picked and chosen assessment and significance criteria from the DMRB and IAQM to suit their needs, rather than in order to provide a robust assessment – this particularly applies to the method they have employed to discount at the screening stage any air quality effects on Lewisham.	
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		<p>Chapter 6 - Air Quality of the Environmental Statement (Document Reference 6.1) and the Transport Assessment (Document Reference 6.5).</p> <p>In terms of air quality changes specifically in the London Borough of Lewisham, no roads receive a change in traffic flow greater than the thresholds outlined in the DMRB methodology to be required for inclusion within the air quality assessment. Please see paragraph 6.3.42 onwards of the Environmental Statement (ES) for a detailed description of how roads are screened into the air quality assessment. Drawing 6.1 of the ES outlines the air quality study area.</p>		
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<p>4.3.2</p>	<p>As noted in the relevant representation letter dated 26th August 2016 and in a follow-up meeting on 5th October 2016, LB Lewisham expressed concerns that the methodology used to assess impact on air quality is unsuitable.</p> <p>LB Lewisham noted that the methodology within the Design Manual for Roads and Bridges (DMRB) is not appropriate for this assessment as the DMRB defines 1000 vehicles as significant in terms of road design and construction, not in terms of impact on air quality. It also does not take into account existing air quality and existing pollution which is key in Lewisham</p>	<p>As set out in Chapter 6 Air Quality of the Environmental Statement (ES) (Document Reference 6.1), the air quality assessment is undertaken in accordance with the DMRB. The change in traffic flows that triggers the need to undertake an assessment is defined in the guidance. The DMRB guidance is specifically designed for the assessment of road schemes and provides guidance on how to assess both significance and impact on compliance with the EU Directive on Ambient Air Quality. It is therefore the most appropriate guidance to use to assess the Silvertown Tunnel Scheme. The outcome of these assessments are used to support compliance with the National Policy Statement for National Networks. The guidance is used to ensure</p>		<p>TfL and LB Lewisham have discussed this issue. LB Lewisham still has significant concerns regarding the DMRB screening approach as outlined in the DCO application. LB Lewisham believe that TfL have not acknowledged the real impacts of the scheme on non-host boroughs.</p>
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	<p>where an AQMA is already in place, and thus any increase in traffic levels could increase pollution beyond levels which are dangerous to health.</p> <p>In addition, the DMRB guidance is increasingly becoming outdated and recent guidance from Environmental Protection UK and the Institute of Air Quality Management (May 2015) indicates that much lower volumes of traffic could cause significant impacts, particularly within AQMAs. Their indicative criteria are 100 ADDT for LDVs and 25 AADT for HDVs. LB Lewisham considers that lower</p>	<p>that the assessments provide the decision maker information on whether the scheme leads to a significant impact on air quality, or risks the ability of the UK to comply with the EU Directive on Ambient Air Quality.</p> <p>In terms of the IAQM guidance, it states that it is not intended to replace existing guidance for road Schemes and that Highways England has prepared a series of advice notes on assessing impacts and risk of non-compliance with limit values which should be followed (e.g. IAN174/13) in assessing a road scheme.</p> <p>The IAQM is more applicable to assessing the impact of smaller residential and mixed-</p>		
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	<p>levels such as these levels should also be used in TfL's assessment.</p>	<p>use developments. It has not been specifically designed for the use in large infrastructure schemes where large strategic traffic models are being utilised. Furthermore, the indicative criteria of 100 AADD for LDVs and 25 AADD for HDVs are defined for the purpose of determining whether the applicant should or should not proceed with a detailed air quality assessment for the project/development as a general principle.</p> <p>TfL have undertaken a detailed assessment, as presented in Chapter 6 Air Quality (Document Reference 6.1), which is considered robust following the appropriate guidance for the scheme.</p> <p>The IAQM is more applicable to assessing the impact of</p>		
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		<p>smaller residential and mixed-use developments. It has not been specifically designed for the use in large infrastructure schemes where large strategic traffic models are being utilised. Furthermore, the indicative criteria of 100 AADD for LDVs and 25 AADD for HDVs are defined for the purpose of determining whether the applicant should or should not proceed with a detailed air quality assessment for the project/development as a general principle.</p> <p>TfL have undertaken a detailed assessment, as presented in Chapter 6 Air Quality (Document Reference 6.1), which is considered robust following the appropriate guidance for the scheme.</p>		
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	<p>Deterioration in air quality could lead to negative impacts on the health of Lewisham's community.</p>	<p>In terms of air quality changes specifically in the London Borough of Lewisham, no roads receive a change in traffic flow greater than the thresholds outlined in the DMRB methodology to be required for inclusion within the air quality assessment. Please see paragraph 6.3.42 onwards of the Environmental Statement (ES) (Document Reference 6.1) for a detailed description of how roads are screened into the air quality assessment. Drawing 6.1 of the ES (Document Reference 6.2) outlines the air quality study area.</p> <p>The Health and Equality Impact Assessment (Document Reference 6.8) assesses the potential effects of the Scheme on health. In response to stakeholder comments, a quantitative</p>		<p>LB Lewisham's view on the robustness of the Health and Equality Impact Assessment is undermined by LB Lewisham's previous concerns about the reliability of TfL's traffic and air quality assessments.</p>
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		assessment of how changes in air quality may affect the health of local populations has been carried out, including the potential effects of the Scheme on general health.		
4.3.3	LB Lewisham acknowledge that mitigation measures are being put in place through the creation of Silvertown Tunnel Implementation Group (STIG), LB Lewisham wish to ensure that there is adequate monitoring of the impact on air quality.	<p>The initial geographical scope of the air quality monitoring will accord with the study area in the ES (Document Reference 6.1). The indicative locations of the diffusion tubes and automatic monitors (subject to site surveys to ensure that power and the sites are secure and meet health and safety requirements) are set out in the monitoring plan in Appendix A.</p> <p>Proposals for changes in the monitoring locations may be made by any member of the</p>	<p>The STIG Structure provided in the draft DCO provides insufficient safeguards, refer to Written Representation</p> <p>LBL expects to provide further input on likely mitigation measures once their concerns have been satisfactorily addressed regarding the reliability of the traffic and air quality impacts assessments.</p>	See response below in 4.4.1 regarding STIG.

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		<p>STIG if thought appropriate to allow for future impacts to be fully captured during monitoring. STIG is responsible for considering and making a collective recommendation to TfL.</p> <p>At the meeting on 14-Jul-16 between LBL and TfL, TfL explained that any addition of monitoring locations to areas showing no forecast impact in the Assessed Case would need to be justifiable/defensible. As an AQMA LB Lewisham should be monitoring the air quality presently, and TfL agreed to include additional locations if LBL can put these forward with a rationale for inclusion in the monitoring plan.</p>		
4.4 Silvertown Tunnel Implementation Group (STIG)				
4.4.1	LB Lewisham request a neutral chair/decision	It is TfL's view that TfL is best placed to act as a chair of	TfL's proposed structure of STIG means that TfL does not have to	LB Lewisham concern remains

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	<p>maker for STIG.</p>	<p>STIG to take on a coordinating role between the boroughs.</p> <p>Similarly, TfL's Network Management Duty under the Traffic Management Act 2004 and its day to day operation and management of the TLRN mean that it is within its 'business as usual' remit to make decisions on network operation and management hence making it best placed to be decision maker in such matters.</p>	<p>accept STIG's recommendation yet TFL also propose to chair this group. It would be more appropriate for STIG to have an independent chair.</p>	<p>over the status of STIG's recommendations and the extent to which TfL is likely to be influenced by these. There is also concern that the structure of STIG may not provide individual boroughs with the assurance that issues of particular significance to them will be given appropriate weight in STIG's own positions.</p> <p>LB Lewisham awaits sight of the proposed triggers approach</p>
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				<p>to consider the position in relation to mitigation further.</p> <p>TfL is considering these matters further.</p>
<p>4.5 Sustainable transport and improved connectivity</p>				
4.5.1	<p>It does not promote sustainable transport and neglects opportunities to improve connectivity for walking and cycling as it is solely a tunnel for motorised vehicles. Prioritisation of walking and cycling is a priority for LB Lewisham and TfL. This is not being delivered.</p>	<p>Integrating provision for pedestrians and cyclists into the Silvertown Tunnel Scheme would cost in the region of £70m for one bore. Additionally, the length of the Tunnel means that a poor and potentially intimidating ambience is inevitable, and there is concern over safety and security implications. In this context, other crossings and enhancements for pedestrians and cyclists are considered better value for</p>	<p>The announcement of other river crossing is just that – only an announcement with no specific commitment or certainty they will be delivered. This DCO application needs to be examined based on its impacts etc not on something that may or may not happen in the future especially as no actual commitment to the later crossings.</p> <p>Uncertainty remains as to whether cycle transit also proposed for Blackwall and Rotherhithe tunnels.</p>	<p>LB Lewisham remain unconvinced with TfL’s position on walking and cycling as detailed in the DCO application.</p>

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		<p>money.</p> <p>The approach to river crossings announced by the Mayor of London will include the further assessment of a North Greenwich – Isle of Dogs ferry, supporting new development on the Greenwich Peninsula and the Isle of Dogs as well as reducing demand on the Jubilee Line at key times. The Mayor has also asked TfL to look at providing a bespoke cycle-bus which will carry cyclists and their bikes through the Silvertown Tunnel on a turn up and go basis. TfL will provide an update on the cycle shuttle at Deadline 1.</p>		
4.5.2	<p>Furthermore, TfL should commit to providing improved high quality cycling connections at a</p>	<p>As part of the Silvertown Tunnel Scheme TfL is proposing local improvements to pedestrian and cyclist</p>	<p>See above: The announcement of other river crossing is just that – only an announcement with no specific commitment or certainty they will be</p>	<p>Please see response in 4.5.1 above.</p>

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	<p>strategic level from key centres such as Catford and Lewisham, to ensure that sustainable transport is promoted alongside motor vehicles. TfL could build on the existing and proposed Cycle Superhighways in the region as part of the Silvertown Tunnel development.</p>	<p>connections around the Tunnel portals both on the north and south side of the river.</p> <p>Providing further strategic cycle connections to promote sustainable transport does not fall within the remit of the Scheme and would be addressed by TfL's wider cycling programme.</p>	<p>delivered. This DCO application needs to be examined based on its impacts etc not on something that may or may not happen in the future especially as no actual commitment to the later crossings.</p>	
4.5.3	<p>LB Lewisham welcomes the tunnel's ability to carry cross river buses, but no commitment has yet been made on the subsequent bus provision. TfL need to provide a more detailed and defined strategy for cross river buses so that boroughs can consider whether this is supported. Commitment to delivery of an</p>	<p>TfL is making a clear commitment through the TfL Business Plan to support new bus services through the Silvertown Tunnel. This commitment will be included in the draft Business Plan which is due for publication in late 2016. The Mayor has also announced a bus concession for local residents for a period and that the new tunnel will be one of London's low emission bus zones when</p>	<p>See above: The announcement of other river crossing is just that – only an announcement with no specific commitment or certainty they will be delivered. This DCO application needs to be examined based on its impacts etc not on something that may or may not happen in the future especially as no actual commitment to the later crossings.</p>	<p>LB Lewisham and TfL have discussed this issue but it remains the case that until bus routes are confirmed and detailed further Lewisham's position will not be moved.</p>

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	enhanced bus service would mitigate the lack of a pedestrian link.	it opens. TfL is preparing a detailed bus strategy which will set out these commitments. This strategy will be shared with relevant stakeholders though the examination process.		
4.6 Package of river crossings				
4.6.1	TfL need to commit to bringing forward a package of new river crossings	Following his election as Mayor of London in May 2016, Sadiq Khan asked TfL to carry out a holistic review of river crossings options for east London, including the Silvertown Tunnel. This review has now concluded. Aside from enhancements to the Silvertown Tunnel Scheme the package of river crossings includes: <ul style="list-style-type: none"> the acceleration of plans for a new pedestrian and cyclist bridge between 	The announcement of other river crossing is just that – only an announcement with no specific commitment or certainty they will be delivered. This DCO application needs to be examined based on its impacts etc not on something that may or may not happen in the future especially as no actual commitment to the later crossings. The DCO should provide safeguards so that if other river crossings are not delivered then other mitigation will be provided	LB Lewisham is seeking commitments to the bringing forward of other river crossing. TfL considers that such commitments are outside the scope of the Silvertown Tunnel DCO. Both parties have discussed this issue.

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		<p>Rotherhithe and Canary Wharf;</p> <ul style="list-style-type: none">• a new Docklands Light Railway (DLR) crossing at Gallions Reach; and• further assessment of a North Greenwich – Isle of Dogs ferry.		
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4.7 Other Matters

LB Lewisham position: LB Lewisham request that TfL contribute towards LB Lewisham’s costs of preparing and agreeing this SoCG. TfL and LB Lewisham have discussed this issue. LB Lewisham’s position is that TfL should contribute costs due to the amount of additional work and costs for LB Lewisham as a neighbouring borough. Host boroughs have agreed Planning Performance Agreements with TfL and it is understood that their costs are being covered, but this is not the case for LB Lewisham.

TfL position: TfL acknowledges that are resource implications of engaging in the DCO process. However, regrettably TfL cannot contribute to the costs of all interested parties.

5. Agreement

Signed	
Name	
Position	
Company	
Date	
Signed	
Name	
Position	
Company	
Date	