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Planning Act 2008 (as amended)
Infrastructure Planning (Examination Procedure) Rules 2010 (as amended)

Application by Transport for London (TfL) for an Order Granting Development Consent for the proposed Silvertown Tunnel ('the Scheme')

I write in response to your letter dated 18th October 2016, which set out the examination timetable, procedure and notification of hearings and requested information from the London Borough of Newham ('the Council') as an interested party.

In accordance with Item 5 of the Timetable for Examination of the application (Deadline 2) due 14th of December 2016, please find attached with this correspondence the following documents:

- Annex 1: Deadline 2 – Statement of the London Borough of Newham
 - Appendix 1: Cabinet Minutes (3 November 2016)
- Annex 2: Written Submission of Oral Case – Issue Specific Hearing on Traffic & Transport Modelling (7 December 2016)
 - Appendix 1: Local Junction Map
 - Appendix 2: 'Host Borough Tracker' document

Unless expressly modified by this correspondence, the Council's position regarding the Scheme and its impacts remains as set out within its Local Impact Report and Written Representations dated 15th of November 2016.

The views of the Council as presented within this correspondence are considered to be both "important" and "relevant" pursuant to the determination of the Secretary of State under the Planning Act 2008 (as amended).

Yours sincerely,

A solid black rectangular box redacting the signature of Deirdra Armsby.

Deirdra Armsby
Director of Regeneration & Planning



Silvertown Tunnel

Deadline 2:

Statement of the London Borough of Newham

14th December 2016

Purpose of the Statement

This purpose of this statement is to set out the position of the London Borough of Newham (“the Council”) in light of revised application documents, responses to the Examining Authority’s First Written Questions and the Rule 17 request by the Examining Authority and written representations of other interested parties, submitted by Deadline 1 (15th of November 2016).

Unless expressly modified by this correspondence, the Council’s position regarding the Scheme and its impacts remains as set out within its Local Impact Report and Written Representations dated 15th November 2016.

The matters of concern raised by the Council are also considered to be matter(s), outside of the scope of their being presented in an LIR, that are both “important” and “relevant” pursuant to the determination of the Secretary of State under the Planning Act 2008. Therefore, they fall to be considered as such by the Examining Authority in the formulation of its recommendation, and by the Secretary of State in due course.

The Council anticipates making further representations through the Examination Hearing process, to seek the most favourable resolution for Newham residents and businesses in anticipation of its concerns not being resolved. If not, the Council will maintain its objection to the Scheme.

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1.0 Administrative Matters

The Council considers that the proposed Draft DCO powers and obligations cannot extend beyond the geographical area identified as “affected” within the red line on drawings contained within Application Document 2.3 Land Plans (APP-004). This area does not include the full length of the Blackwall Tunnel and its approaches. Moreover, it is considered likely that, as a result of this omission, the full nature of the Draft DCO powers will not have proper clarity to all parties with a potential interest in these proposals.

Furthermore, the Council remains to be convinced that the user charging as proposed may properly be authorised by the Draft DCO - in circumstances where user charging for river crossings by TfL (rather than by the Mayor) is not contemplated by the Mayor’s Transport Strategy. This would appear to be contrary to the Secretary of State’s NSIP Guidance.

Additionally, the Council remains to be convinced that the current application falls wholly to be considered by the Panel pursuant to section 104 of the Planning Act 2008 – due to a number of factors in particular, to determine the application in accordance with the national policy statement would lead to the United Kingdom being in breach of its air quality obligations. The Council is seeking further legal clarification as to whether the application falls to be considered by the Panel or a report forwarded to the Secretary of State to determine whether or not to grant the application Order which is able to be forwarded forthwith and shared with the Panel.

As set out within the Council’s Written Representation (at Deadline 1), the Council supports the principle of additional river crossings in the East and Southeast sub-region, but considers that a strategic package of crossings is required to deliver all mode cross-river connectivity and unlock the development potential of the Sub Region. In consideration of the potential impacts of the scheme, the Council maintains its preference for a highway crossing at Gallions Reach. It is noted with some dismay that the Draft TfL Business Plan appears to prioritise a DLR only crossing in this location, placing emphasis on the current Scheme as the sole

highway river crossing to be considered over the plan period (2017/18 to 2021/22). In this regard the Council is disappointed that the Applicant, in response to First Written Question (FWQ) Reference GA2, failed to adequately justify why priority is afforded to the Silvertown Tunnel as opposed to spreading the benefits of further river crossings widely as an earlier opportunity. The diminishing commitment to a road crossing at Gallions Reach, combined with the current Scheme's lack of obvious benefit to the Borough sits at the heart of the Council's concerns and is reflected in the minutes of the Cabinet Meeting on 3rd of November 2016, attached at Appendix 1.

2.0 Traffic & Transport Modelling

These issues are discussed together, as they are all related to the impacts of the Scheme, which obviously remain the Council's key concern on behalf of its residents and businesses.

The Council's concerns over these matters remain as set out in the LIR, Written Statement for Deadline 1 and as presented in the oral hearing on traffic modelling on 7th December. (A written version of the Council's remarks made to the oral hearing are to be submitted for Deadline 2 in a separate document.)

The key areas of concern remain:

- The value of time used in the modelling and its applicability to the particular socio-economic characteristics of East London. What consideration was there of a London-specific or locally calibrated set of values, based on stated preference or discrete choice, and why was it concluded that the use of UK National figures was deemed appropriate? The Council is also concerned that the major generators of time benefits for the economic case are work car trips, with limited time benefits to other user groups (and even some disbenefits).
- The evaluation of the behavioural response to the introduction of a user charge across the wide range of user groups, and how these different elasticities have been validated. What are the behavioural responses across the range of socio economic groups of users and what attempt has been made to evaluate the social impacts of these?
- The lack of a confidence level being provided for the modelled outputs, so that their likelihood can be gauged. The Applicant has admitted that it is an inherently difficult modelling exercise, but still claim to have it so correct as to offer a single set of model outputs on which the entirety of the traffic and environmental impacts are identified.
- There remains concern by the Council over the effect of user charging resulting in a change in the socio-economic profile of cross-river trips. Many tunnel users in the peak hours are from the highest socio-economic groups, and are made up of some of the UK's highest earning individuals, whose sensitivity to the level of toll is correspondingly extremely low while their

values of time are high. In contrast, there are other tunnel users from lower economic groups who are very sensitive to a change in toll, but who have lower values of time and are prepared to endure delays as a result. At the moment, their willingness to endure a longer travel time and some journey time unreliability ensures that there is a degree of balance across socio-economic groups who use the currently free crossing at Blackwall and ensures that these lower income groups are represented amongst existing tunnel users. The introduction of a toll will favour those with an ability and willingness to pay and those with higher values of time over those from lower socio-economic groups who are more price sensitive. It is therefore imperative that the social impacts of the Scheme are fully evaluated and robustly underpinned with evidence-based assumptions, as it is entirely possible that it will reduce cross-river connectivity opportunities for some socio-economic groups in this part of London.

- There remains some confusion in the Applicant's documentation regarding trip lengths of users in the evaluated time periods. The O-D data used was some years out of date (TfL would not have accepted such an old data set had it been presented to them by a third party) and despite the availability of extensive Telefonica mobile phone data, it is not clear what use has been made of this data. The determination of trip length is key to identifying the users of the tunnel, and the extent of local connectivity provided by the Scheme, as opposed to the facilitation of longer strategic and commuter trips. Achievement of the latter could be considered at odds with MTS strategies and some of the Scheme's stated objectives.
- The Applicant's own expertise (as opposed to that of their consultants) in modelling user charges is not clear. The congestion charge is often cited as a previous relevant modelling exercise, but the Council does not accept that this is a comparable scheme, as the effect of a user charge for every use of a single link in a highway network is very different to that on a wide area, where a charge is only levied once. Previous modelling exercises involving river crossings in the sub-region were far from exemplary, and do little to foster confidence among the Host Boroughs, who have their own experiences of having to deal with these modelling inaccuracies. Specifically, the Thames

Gateway Bridge and DLR Woolwich Arsenal Extension modelling exercises were sub-standard and were rejected by the Planning Inspectorate and required a complete revision of timetabled services, respectively. There is further discussion of this past record of cross-river modelling in the Council's written summary of its oral submission to the ISH on Traffic Modelling.

- Confidence in modelling outputs are further undermined by some of the applicant's own admissions on the subject. For example, "TfL acknowledges that there remains an inherent challenge in forecasting this kind of response and it remains possible that elasticities (willingness to pay) has (sic) the potential to be higher or lower than assumed in the assessed case. This is a key argument for the proposed flexible charging power, to ensure that the scheme can respond effectively to circumstances which can never be conclusively modelled..." This is almost a clear admission that the assessed case modelling is known by the Applicant to be just one of a range of possible outcomes and yet only one is presented, on which the entirety of the traffic, noise and air quality impact evaluation is based.
- Concerns also exist over the approach to local modelling, which is considered inconsistent with TfL's own requirements of others. The local model has not been subject to strategic model iteration nor has it been fully validated. Put simply, the local model would not be acceptable to TfL were it presented to them for approval. Indeed, the whole approach to local modelling is of some concern. It is not presented as an integral part of the transport assessment but rather as an afterthought in Appendix C of the Transport Assessment. It has also been undertaken largely as an illustrative exercise, as the main TA report claims that mitigations are not shown to be necessary. The local modelling does not permit the Local Authorities concerned to make informed decisions over the likely highway impacts of the Scheme at a local level, and provides insufficient reassurances that any potential mitigations can be effectively addressed. Therefore, the local modelling is not considered fit for purpose.
- The Applicant's entire approach is to defer any detailed modelling and impact identification until nearer scheme opening, and the apparent lack of concern over the ability to accurately model the potential impacts on the scheme now

seems driven by the assumption that any likely impacts from the scheme can be easily and effectively mitigated after scheme opening. The Council does not share this view and has already cited examples in its Written Statement for Deadline 1 where the mitigation of potential scheme effects is either not within the applicant's control (eg tolling of Woolwich Ferry) or the mitigation would not be acceptable to the Local Highway Authorities concerned (eg adjustment of signal timings to limit access to an area). There is an argument that suggests that there could be a degree of complacency regarding the modelling exercise as a result of this reliance upon monitoring the actual effects after opening and the implementation of mitigations at that time. The Council considers therefore that the applicant has placed an over-reliance on the post-scheme monitoring and mitigation exercise at the expense of robust pre-scheme modelling, and that this approach does not help either the Examining Authority or the Local Authorities concerned to make judgements on the likely scheme impacts at a local level or their effective mitigation.

- This mitigation issue is of further concern when examining the suggested frequency of STIG meetings in the TIMS, which are suggested to occur not more than once per year. The prospect of an impact being unaddressed for a period of months because of the timing of meetings where mitigations are discussed is entirely unacceptable, and the frequency of meetings must be dictated by monitoring data – which should be continuous.

Despite these remarks, the Council welcomes the additional information provided by the applicant in response to the First Written Questions on Traffic Modelling (TT) which provides some more background on the development of the modelling suite used. However, this information has not, as yet, changed the Council's view on these matters or on the reliability of the outputs.

The Council particularly welcomes the requests made by the Examining Authority (ExA) for further information regarding the models used, including income segmentation in the model, how elasticities and behavioural responses have been validated across user groups and other points of modelling detail. The request by the ExA provides the Host Boroughs with considerable reassurance, in that they have

sought more detail on aspects of the modelling approach which correlate closely with those flagged by the Host Boroughs. It is hoped that this additional information will help address some of the points raised by the Council regarding modelling processes thus far, and the extent to which this has been achieved will be reported to the ExA for Deadline 3.

3.0 Equality Issues

The Council is concerned that Equality Act 2010 (PSED) requirements have not been met. The Applicant accepts that lower income socio-economic groups should be properly identified as vulnerable for the purposes of its proposals. The London Borough of Newham is one of the most deprived local authority areas in the country and sits at the gateway to both the existing and proposed tunnels. However, the assessment supporting the proposal fails to analyse impacts upon lower income socio-economic groups within Newham Borough (which are lost with the much broader “Host Boroughs” analysis), nor does it assess the impacts upon the elderly or the mobility impaired adequately either in total or within the lower income groups within the Newham Borough. This equality issue as to how the different user groups are affected by the imposition of a user charge, currently unknown, is also raised in the preceding sections on traffic modelling.

The Council remains of the view that an effective means of protecting vulnerable user groups from the effects of user charges would be a discount scheme of some kind, either geographical or hardship-based. As such, the Council is disappointed that the Applicant still makes no offer regarding this issue in the Revised Charging Policies and Procedures document.

Despite it being proposed initially, the so-called ‘Community Fund’ according to TfL’s response to FWQ SE.1 does not satisfy existing planning ‘tests’ as being necessary and directly related to the mitigation of Scheme impacts. The Council strongly contests this view, as the ‘Community Fund’, could provide a financial framework for the mitigation of socio-economic impacts across certain vulnerable user groups (if operated and maintained properly by the Applicant or subsequent operator). These impacts would clearly be a direct consequence of the Scheme and would be necessary to ensure Scheme equity. It would also act as a ‘catch all’ fund to address any other unanticipated impacts that may arise as a result of the scheme. Given the degree of uncertainty the Host Boroughs have over the forecasting, this additional means of addressing unforeseen impacts is considered essential.

As previously stated, the Council remains concerned the Scheme will bring about a

change in the socio-economic profile of cross-river trips to the detriment of local cross-river connectivity, and the effective administration of a discount scheme or hardship fund could assist to ensure that trip suppression is limited and cross river connectivity retained among low-socio economic and other vulnerable users.

At a political level, there is a wider equity issue in question in relation to the imposition of user charging of an existing free crossing in the eastern sub-region, and additionally the requirement for East Londoners to pay for this proposed new infrastructure themselves, despite being starved of major investment for so long which has resulted, in part, in the prevailing socio-economics of this sub region. This is regarded as simply unfair and inequitable, especially as other significant infrastructure projects are not proposed to be funded in this way. TfL's support for the Garden Bridge simply hardens opinions in East London on this issue.

While the relationship between user charges and the suppression of strategic and commuter trips is a principle that is broadly accepted by the Council, the Borough's position regarding the imposition of tolls on local trips remains unchanged from that set out in its written Statement for Deadline 1. Much-needed *local* connectivity across the river which the Scheme purports to provide must not be suppressed by user charging and a geographical discount scheme must be implemented to protect Newham residents and businesses from any further economic disadvantage.

Any new river crossing must prioritise local connectivity above longer length strategic and commuting trips, and without local discounts, essential local cross-river trips could be suppressed and replaced by wealthy commuters from further afield with a greater willingness and ability to pay than local residents.

It is hoped that the Applicant will provide additional detail on the disaggregated differential social impacts across a range of user groups which will allow us to make some progress on this issue in due course, but without a change in their position on discounting, the Council remains opposed politically to the proposal as presented. On the issue of setting the user charge, the Council broadly welcomes the inclusion of a user charge assessment framework but notes with disappointment that it does

not include triggers. It is also the Council's view that the Host Boroughs in particular must have a greater say in approving any changes to a charging regime, as they are the direct recipients of any consequential impacts from any such change.

4.0 Public & Active Transport

The Council welcomes the potential for improved public transport services that the Scheme could provide and the Applicant's revised offer in this regard. However, we remain of the view that it still falls short of a full commitment, and also fails to include firm proposals for the Emirates Airline to supplement the proposed bus services in providing cross-river connectivity.

The principle of a bus strategy is welcomed, although a commitment to secured funding remains missing, and there is still no suggestion that this public transport provision will form a DCO Requirement, as requested by the Host Boroughs. The TfL Business Plan published in draft on 10th December makes no financial commitment to these new services. In addition, the Business Plan states that overall bus mileage in London will be frozen year on year over the coming years. This suggests that any expansion of bus services to provide new routes to use the Silvertown Tunnel will be at the expense of other services elsewhere in London. Any withdrawal of a bus service will, by statutory necessity, be subject to public consultation and therefore cannot be guaranteed, so what a commitment to new services using the Tunnel actually means in the reality of London-wide bus operations remains in question. This remaining uncertainty over future bus services using the Silvertown Tunnel is not acceptable, particularly as the public transport offer is purported to offset the socio-economic impacts on certain user groups. The Applicant must undertake mapping of suppressed trips and proposed public transport services, to ensure that the public transport services are not simply nominal connections between local centres in the sub-region (as they appear to be at present), but instead actually target those trip origins and destinations where trips are suppressed for socio-economic reasons, so that a viable public transport alternative is provided *where it is needed*. The Council does not believe that this 'tailoring' of public transport services to offset those areas where socio-economic impacts are greatest has been undertaken by the applicant. However, it must be, before the value of the proposed public transport services in addressing socio-economic impacts can be verified.

The Council also believes that, although STIG has a consultation role, the final approval for proposed routes, frequencies and services must be from the Local Authorities which the bus route serves. A key component of this approval must be the correlation between service provision and social need.

In terms of cyclists and pedestrians wanting to cross the river, they are prohibited from using both the new tunnel at Silvertown and the existing tunnel at Blackwall. Initially, The Scheme initially proposed nothing at all for cyclists and pedestrians, but by Deadline 1, with the encouragement of the London Mayor, a shuttle bus offer has emerged which would offer a turn up and go service for pedestrians and cyclists to cross the river. However, details (such as timing, location and cost) are unknown and the road network, particularly on the south side, does not offer many drop off or pick up locations that are readily accessible to pedestrians and cyclists, so the Council would need to see more detail on these proposals before making any judgement as to their acceptability. The long-term viability of such a shuttle service and the length and extent of the commitment for TfL to fund this service remains unclear, and commitments on both these points will be sought from the Applicant. A DCO Requirement on this shuttle service is requested.

The Council's preferred solution for cross-river cycling and walking trips that are prohibited from the tunnel remains for the Emirates Air Line to play a long overdue role in delivering cross-river local connectivity. As mentioned in the Council's Deadline 1 submissions, this would require integration into the wider TfL PAYG system and re-pricing in line with other TfL modes. Free trips for local residents at peak times should also be considered, in order to encourage more sustainable cross-river travel when demand is at its highest. This would meet wider MTS objectives and encourage more sustainable travel in the sub region. It is therefore disappointing that little has been offered by the Applicant in this regard given that it replicates the route of the new tunnel almost exactly with good existing pedestrian and cycle connections to each terminus. The Council will therefore continue to seek commitments from the Applicant on the EAL's role in delivering sustainable cross-river connectivity.

5.0 Air Quality, Noise & Vibration

Air Quality

The Council's primary issues regarding air quality stem from the uncertainty over the suitability of the modelling and lack of sensitivity testing undertaken by the Applicant against its 'most likely' assessed case scenario. In addition, the Council is concerned that there is a lack of air quality mitigation measures available to be implemented if the DCO were to be confirmed. Compounding this, the Council is disappointed in the unwillingness of the Applicant to mitigate against identified adverse impacts, on the basis that they are not considered significant. The monitoring of the Scheme impacts must be undertaken against agreed triggers. The Council takes the view that Paragraph 123 of the National Planning Policy Framework does apply, and accordingly, the Applicant should actively mitigate and reduce adverse impacts of the Scheme to a minimum.

Below are the Council's comments on the Applicant's responses to the ExA's First Written Questions (FWQs) on air quality.

- **AQ.1:** It is generally agreed that the opening year presents a worst case air quality assessment (providing that traffic forecasts are robust).

Notwithstanding, the Council has concerns with regard to the input data to the modelling, as well as the lack of sensitivity testing. This gives the Council little comfort that the mitigation proposals are sufficiently sensitive to deal with the air quality issue.

The Silvertown Tunnel AQA states that,

6.6.23 The results show that 31 of the 52 representative receptors exceed the AQS annual mean objective of 40µg/m³ in the reference case 2021. The results of the modelling indicate that there are both improvements and deteriorations in air quality at sensitive receptors due to changes in traffic as a result of the Scheme descriptor of change (in the context of Highways

England 174/13) modelled at all 13,274 receptors.

An underestimate of the NO₂ produced by the poor efficiency of EuroVI engines within the current Defra pollution modelling methodology may be reflected in the likely exceedance of the 40µgm⁻³ Objective threshold at a further 11 sensitive receptors, based on those sites that currently experience levels of 30µgm⁻³ or higher. This would result in some 42 of the 52 sites in the assessed case exceeding the AQS Annual Mean Objective.

Where the Tunnel modelling has been shown to produce a worsening in NO₂ levels (of between 0-3), the effects are largely forecasts because of changes in the level of traffic. These trends will continue, but the forecast pollution will be elevated should the modelling methods be updated, as requested. The most apparent impact therefore is that the impact tables will show relative Tunnel impacts to be little changed but with a potential for some further deterioration in levels.

- **AQ.10:** The Applicants response to this question indicates that the current modelling does not correctly represent the anticipated HGV flows through Silvertown tunnel and this under representation of HGV's would subsequently result in an under estimate of the air quality and noise impacts of the Scheme.

AQ.13 & AQ14: The Hoola development is not currently included in the Council's air quality management area. The modelling undertaken by the applicant indicates that the site moves from compliant with air quality objectives to non compliant. Subsequently requiring action by the Council to declare this additional area as an AQMA. If air quality levels are increased following remodelling (which needs to occur), the declaration area will be increased further. Without the benefit of updated and accurate air quality modelling to assess the Tunnel impacts it is clear that there is likely to be some worsening of pollution in relation to the Tunnel and therefore this suggests that the ability of the Borough to achieve compliance by whatever timescale will be made more difficult.

- **AQ.15:** The Council is concerned over the robustness of the traffic modelling and therefore the quality of the air quality assessment. Further modelling is required in order to come to a firm position on whether the development would lead to a significant air quality impact in the Council area. The area close to the Hoola development is subject to a significant deterioration in air quality which moves this area from compliant to non-compliant. The suggested timescales for the period of non-compliance is of limited duration, however more robust modelling is required before it could be stated as to the significance of this. The timescale for compliance could also be affected by any new timetable for DEFRA's air quality plan. The current modelling indicates compliance within the current timescales reported to the European Commission.
- **AQ.19:** The Council does not accept that mitigation is not required for the Hoola development and would wish for the Applicant to consider a wider range of measures to reduce air pollution levels at this site or to reduce exposure. Current mitigation is limited to demand control through the charging scheme, though further steps could be taken with regard to encouraging or requiring low emission vehicles either through the charging scheme or the extension of the ULEZ. Ventilation schemes on the Hoola could also reduce exposure.

Tunnel ventilation may also assist. DfT Guidance HA207/07 explains that where local air quality is adversely affected then Tunnel portals and ventilation shafts should be sited so that the openings do not impact on air quality at sensitive locations. The build-up of pollution in tunnels means that the air expelled from them contains higher concentrations than those observed near open roads. Therefore, there is considerable scope for optimising portal design to facilitate improved dispersion and dilution.

- **AQ.20:** The statement that monitoring will be updated prior to the introduction of user charging ignores the potential effects of traffic re-routing and the effect

on modelled (forecast) traffic and compositions that is critical to the prediction of air pollution in the future. Sensitivity tests at this stage that reflect the effects of user charging regimes and elasticities on future traffic would assist in giving confidence that air pollution levels can be mitigated in the future.

Further to the above, the Council has had the opportunity to review the Applicant's response to the ExA's request for further information (Rule 17), which was made principally in light of Mr Justice Garnham's High Court Judgement of 2 November 2016, in relation to the Department of the Environment Food and Rural Affairs (DEFRA) 2015 Air Quality Plan, and notes the following:

- **Question 1.1** The Council agrees with the Applicants statements at paragraphs 1.1.1 to 1.1.5. In respect of paragraphs 1.1.6 and 1.1.7 the Council considers that there are circumstances which could come out of the Governments new air quality plan that could impact upon the Scheme. Therefore the Scheme may or may not result in circumstances which could hold up compliance with the EU Limit Values. In essence this is yet undetermined.

The Council agree with the Applicant that there are implications arising from the High Court judgement for the compliance assessment against EU Limit Values. Furthermore the Council consider that the application is unable to proceed until the updated emission factors are available for modelling.

- **Question 1.2** The Council considers that under the NPPS it is for the Panel to consider both the EU Limit Values and the Air Quality objectives in their decision and the EU limit values are not solely a consideration for DEFRA.
- **Question 1.4** The Council disagree with Applicants response to question 1.4. Furthermore the Council consider that without comprehensive modelling, there remains a question as to whether the Scheme will lead to a significant impact on air quality or delay compliance with the Directive. The judgement provides justification for the reduced flexibility in the approach in setting mitigation and user charging and the Council considers that these matters

must be able to be quantified and hence determined for the Order to be determined against all relevant and irrelevant considerations

Noise and Vibration

The Council's primary issues regarding noise and vibration stem from the lack of sensitivity testing undertaken by the Applicant against its 'most likely' assessed case scenario. In addition, the Council is concerned that there is a lack of noise mitigation measures available to be implemented if the DCO were to be confirmed.

Compounding this, the Council is disappointed with the unwillingness of the Applicant to mitigate against identified adverse impacts, on the basis that they are not considered significant. The Council takes the view that Paragraph 123 of the National Planning Policy Framework does apply, and accordingly, the Applicant should mitigate and reduce adverse impacts to a minimum.

The revised monitoring strategy and original Traffic Impacts Mitigation Strategy (Doc. 7.7) refer to noise barriers and low noise surfacing being potential mitigation measures available to the Scheme, however the Environmental Statement leads us to believe (and we would expect) that all possible barriers and low noise surfacing will be installed as standard for the tunnel portal and all roads within the Order Limits. These measures are therefore exhausted in the original design and only the charging process and localised signalling issues are available once the tunnel is built. The impact these latter options have on noise impacts has not been assessed anywhere in the ES so it is unsure how these can be relied upon in the future.

The Council has serious concerns over the lack of noise modelling done, and commensurate concerns that if the modelling is not correct (as we have queried with the Applicant), then no assessment on potential mitigation measures has been undertaken to demonstrate how effective these measures could be in reducing noise levels.

Any monitoring and modelling undertaken to assess the noise impacts as part of the annual reports will need third party auditing. The Council is not convinced that the Silvertown Tunnel Implementation Group (STIG) is going to have continuous funding

available to to employ this service, ensure correct assessments are carried out and to allow for requisite recommendations to be made.

Notwithstanding the Council's primary concerns about the make-up and function of the STIG there are particular concerns that given the subjective nature of noise impacts TfL may easily override recommendations made regarding noise. These concerns are heightened by the unwillingness of the Applicant to mitigate against identified adverse impacts as mentioned previously. This lends weight to the Council's desires to agree triggers and limits for the onset of mitigation.

The Applicant claims that all 'reasonably expected' impacts can be assessed within the 3 year pre-operations and 5 year post-operational tunnel monitoring. The Council express concern as to whether this is practically feasible and whether this will be the case. Further clarification and modelling is required to understand how the 5 year post operational tunnel opening compares to the final 2036 case assessed in the ES. Additionally, clarification is needed from the Applicant to demonstrate how it will ensure that maintenance work and Blackwall Tunnel closures will be factored during the intended monitoring period to allow of fair representation of normal operations to be monitored.

In addition to the above, the Council has considered the Applicants responses to the Examining Authority's First Written Questions as well as amended application documents, and comments as follows:

Noise monitoring

- The Council understands that after 3/5 years of monitoring post-tunnel opening the Silvertown Tunnel will then come under TfL's general networking performance monitoring programme. The Council considers that details of the programme should be provided to allow for an assessment on its suitability.
- The monitoring proposed within Section 3 of the Monitoring Strategy seems to be spread over a wide area, with very little detail on how the areas local to the tunnel portal in Silvertown will be monitored. There is in fact no traffic flow measurement intended for Tidal Basin Road, where the most impacted

receptors of the Scheme are located (Hoola and The Pumphouse). The Council considers that this road needs monitoring to ensure that the expected impact is what is experienced in reality.

- In consideration of paragraph 5.2.1 of the Revised Monitoring Strategy (Document Reference 7.6), the Council would seek clarification as to whether the Applicant is intending to use the baseline pre-construction noise monitoring data gathered by the contractors, as part of the CoCP requirements, to base the pre-operational road traffic noise assessment on? If the Applicant is intending for monitoring to be undertaken by the construction contractor to present to the Council for approval as part of the Section 61 process, then it is unclear how TfL would control what is being monitored to ensure it is relevant for operational noise monitoring, and that the monitoring is undertaken for the duration of the 3 years prior to the tunnel opening. In the absence of clarity on this issue, the Council have concerns about the validity of the pre-construction monitoring, which is not under the control of TfL, being used for long-term traffic monitoring purposes.
- Noise monitoring undertaken for the production of the ES is still relied on, however the Council has concerns regarding the location of the monitors and lack of photographic evidence or monitoring logs demonstrating what and where was monitored. This information hasn't been provided for Deadline 1 and remains outstanding. Appendix 14B of the ES (6.3.14.2) doesn't show locations precisely enough and without some narrative and photographic evidence the Council is unable to determine precisely where the noise monitors were and what was affecting the noise levels being recorded. For example, localised plant noise or construction noise may have had an impact on noise levels, skewing the results of the monitoring. If this monitoring is incorrect then the LOAEL and SOAEL assessments for construction and operational noise may also be incorrect. The Noise Insulation Regulations assessment in Appendix I of Document 8.9 Principal Issue: Noise and Vibration may also need reviewing. Similarly Appendix A.3 of the Revised Monitoring Strategy (Document Reference 7.6) shows proposed operational noise monitoring locations in poor resolution. The Council seeks clarity as to the precise noise monitoring locations.

- Reliance still rests on future work to be carried out pre-construction by the appointed contractor to give a better understanding of local conditions. The Council considers that this work should be carried out up front, to allow for a better understanding of Scheme impacts from the outset.

Road Surfacing

- Options for road surfacing have been provided, although this is not a requirement of the Design Manual for Roads and Bridges (DMRB) process.
- While the Applicant has followed guidance set out in DMRB the Council maintains concerns that the road speed limits in this area are low enough that the 1 dB improvement that TfL have applied in their assessment will not be the reality.
- HGVs and buses are the vehicles more likely increase in Silvertown as a result of the Scheme and these are noisier vehicle types than cars with respect to tyre road interaction. The Council notes that this matter has also been raised by the Royal Borough of Greenwich (RBG).
- At low speeds, which are a very real possibility with congestion, the dominant noise will be engine noise rather than road-tyre interaction noise. This has been raised with the Applicant previously who have stated that they have followed the DMRB process.
- The Council's concerns in this regard have been heightened by the Applicant's response to Question FWQ NV.15, when discussing the inclusion of high friction surfacing and why they haven't assessed the impact of this surfacing in the ES. The Applicant has stated at NV.15.8 that at locations where high friction surfacing could be used around such as junctions and approaches to controlled crossings, traffic speeds would be low and the engine noise rather than the tyre interaction with the road surface would be the dominant noise source. This response validates the Council's concern about the dominant noise levels in the area around the ST portal in Silvertown and questions whether the proper impact of the traffic noise has been correctly assessed.
- Low noise surfacing is to be installed on all roads within Order Limits, however the Council maintains concerns that impacts will be felt further afield, such as along Silvertown Way and the junction from Silvertown Roundabout

up to Silvertown Way (around the Hoola) which are not included in the Order Limits. Low noise surfaces have been used to assess the noise impact at The Hoola, although the surrounding roads (listed above) are outside of the Order Limits and therefore outside the scope of any Scheme approved pursuant to Requirement 12 of the DCO.

- It is anticipated that all roads in the network will be low noise by 2036, but this is anticipated to be greater than a decade post-completion of the Silvertown Tunnel, and thus a long time to wait if the Applicant's assessment is incorrect and the noise impact is worse than predicted. Appendix B of application document 8.9 FWQ Noise NV Report (REP1-166) offers details of service life of the surface treatments, via a report by the Association of Directors of Environment, Economy, Planning and Transport (ADEPT) and the Road Surface Treatments Association (RSTA). Within this Appendix it is detailed that for low noise surfacing under heavy usage, the service life is expected to be 10 – 15 years. For high friction surfacing the service life is expected to be 4 or 8 years. These timeframes are quite short and any maintenance will have effects on traffic congestion in the area. The Council would therefore expect the applicant to minimise these potential congestion effects of more frequent maintenance as part of their highway authority responsibilities under the Traffic Management Act.

Noise Barriers

- Although it is noted that Noise Barriers (as an operation noise mitigation measure) would be subject to an assessment of the Council under Requirement 12 of the dDCO, it noted that the Council will wish to see assurances, via 3D noise modelling, that an appropriate noise reduction can be achieved by the barriers and that any barrier reflection effects are not likely to diminish the effects of the proposed mitigation. It is also noted once again that Requirement 12 will only apply to operational noise mitigation measures within the order limits, and the Council maintains its position that mitigations outside of the order limits will be also required.

Construction Hours

- The Applicants response to FWQ NV8 (Paragraph NV8.7) appears to quote the previous version of the Code of Construction Practice, noting Saturday working times continuing until 14:00. These hours have been amended in the Code of Construction Practice (CoCP) revised document to read as a 13:00 finish on Saturday, which the Council welcomes.
- The Council considers that TfL's response to FWQ NV 18 requires further clarification, in particular the reference within Paragraph 18.3 that 23:00-07:00 is a 12 hour period, not an 8. This provides the Council with little confidence that that the construction noise calculations provided for night-time works are correct.

6.0 Further Comments on Revised Application Documents

Draft Development Consent Order

Having considered the Applicant's Draft DCO Rev 1 (REP1-095)(dDCo), together with the revised explanatory memorandum (REP1-098) and document explaining DCO amendments (REP1-181), the London Borough of Newham comments the following:

Article 2(1) – Definition of “commencement”

- The Council welcomes the tightening of this definition through the removal of the “carve outs” for ‘archaeological investigations’, ‘remedial work in respect of any contamination or other adverse ground conditions’ and ‘diversion and laying of services’. In this regard, the Council maintains concerns that this definition, which provides for immediate erection of plant equipment, hoarding (with advertisements) would be seen to be seen to be ‘commencement’ in the eyes of the public. At a minimum, in the interest of transparency and good planning practice, the Council would expect commitment from applicant to provide appropriate community liaison resources.

Article 3 – Disapplication of legislation, etc.

- The Council questions the inclusion of the Community Infrastructure Levy Regulations 2010 (CIL Regulations) within this part. Any disapplication of the CIL Regulations should be robustly justified.

Article 5 - Limits of Deviation

- The Council welcomes improvements to this Article being the defined upwards vertical deviation limit and removal of the ability to vary the number of tunnels.
- It is maintained that the limits of deviation should include scope for appropriate mitigation works outside of the order limits.

Article 12 – Agreements with street authorities

- It is considered that ‘A street authority and TfL may enter into agreements with respect to’ should be reworded to ‘In the event of undertaking any of the following, TfL must enter into agreements with the street authority’.

Article 29 (1) – Temporary use of land for carrying out the development

- Having regard for the nature of the land uses on the northern portal site, the Council has substantial concerns that this Article provides for the construction temporary works (including the provision of means of access) and buildings on the land, and provide temporary facilities or works for the benefit of landowners or occupiers temporarily displaced as a result of carrying out the authorised development. If it is the Applicant’s intention to retain and temporarily displace land uses on the northern portal site during construction the implications of these interim proposals should be known and assessed. It is the view of the Council that the cohabitation of continued operations together with the construction phase of the authorised development may give rise to cumulative effects (air quality, noise, vehicle movements) that have not adequately assessed in the Environmental Statement.

Part 4 – Operational Provisions

- The Applicant's responses to FWQ DC.59-DC70 in relation to Operational Provisions are not yet accepted by the Council. The Council is seeking legal opinion on the lawfulness of these provisions and anticipates making further representations.

Part 5 – User Charging

- The Applicant's responses to FWQ DC.71-DC.76 in relation to User Charging are not yet accepted by the Council. The Council is seeking legal opinion on the lawfulness of these provisions and anticipates making further representations.

Article 58 - Transfer of benefit of Order, etc

- The Council maintains a high level of concern with regard to the extent of the provisions of this Article. In particular, the Council is concerned that this Article would allow TfL to transfer its ability to revise the Charging Policy (in accordance with Article 52 (2)) and to chair STIG (Article 65 (2)(a)). The Council has sought further clarification from the Applicant on this matter, these discussions have not yet been resolved.

Article 65 – Silvertown Tunnel Implementation Group

- As established by this Article, the Silvertown Tunnel Implementation Group (STIG) is a consultative body which may make recommendations to TfL on the implementation of the monitoring strategy, traffic impact strategy and user charges, among other matters. It is questionable then, why STIG, whose recommendations must be considered by TfL, should be chaired by TfL.
- Further to this, and as defined by Article 65 (9)(c), in the case of an equality of votes to make a recommendation to TfL, TfL will have a second or casting vote. The Council also remains concerned that Boroughs and parties who may not be affected by site specific mitigations will have equal voting power as the Borough or Boroughs who are directly affected by mitigations.
- Article 65 (7) sets that once the monitoring strategy and traffic impacts mitigation strategy have been implemented, STIG will meet as determined by TfL and not more frequently than once a year. It is noted that the Examining

Authority raised the appropriateness of this matter in a question to TfL (FWQ DC.86) and the Council takes the view that this limitation on the frequency of meetings (except as decided by TfL) is inappropriate and to the detriment of the Council's ability to secure appropriate mitigations of Scheme impacts for its residents.

Article 68 – Deemed consent provisions

- The Council remains concerned that deemed consent provisions are in some cases inadequate for the Council to discharge its public law duty.

Schedule 2, Part 1, Requirement 4

- Requirement 4(1) should clarify that the details to be submitted are to be designed in accordance with the design principles as required under Requirement 3(1). This should form part of a statement as part of any submission should include specific reference to details of materials.

Schedule 2, Part 1, Requirement 5

- In drafting terms, the Council welcomes the restructuring of this requirement to split the documents which require approval and which require consultation only.
- The Council maintains reservations regarding its various roles as set out within this requirement. In particular, the Council considers that the Construction Environmental Management Plan (CEMP) should be approved by the Local Planning Authority, and thus should fall under Requirement 5 (3). The Council notes that discussions are ongoing with TfL and anticipates making further representations pending the outcome of these discussions.

Schedule 2, Part 1, Requirement 6

- Requirement 6(1) should clarify that the details to be submitted are to be designed in accordance with the design principles as required under Requirement 3(1).
- New requirement for euro VI busses – The Council expresses concern as how these are to be monitored, enforced and the influence by the Mayor of

London's proposals of ULEZ exempt roads.

Schedule 2, Part 1, Requirement 13

- It is acknowledged that this requirement has been added to secure the requirement that TfL must ensure buses keep running as part of a bus service provided or secured by TfL through the Silvertown Tunnel that must meet the 'Euro VI' European emission standard. The Council welcomes the inclusion of this requirement but seeks further information as to how compliance with this requirement would be monitored and enforced.

Schedule 2, Part 2, Article 16

- The Council supports the inclusion of a 'draft submission' process at Article 16 (1).
- The London Borough of Newham considers that the consultation role should be defined within this part, and parties should have a defined period by which to respond.
- This has particular implications for the Council, who are required to consult the London Borough of Tower Hamlets (LBTH) on all applications pursuant to requirements. To give an example, in the case of the Ecology Management Plan, LBTH may wish to consider the consultative response of Natural England prior to finalising its own response. This has implications on the Council's ability to meet the timeframes as set out in the order.

Schedule 2, Part 2, Article 17

- The Council considers that within this part days should be substituted for business days (as is defined in the dDCO).
- The comments provided herein should not be taken to be an exhaustive list as the Council reserves the right to comment further on the wording of the dDCO and subsequent iterations through issue specific hearings and subsequent deadlines, as further details become known.

Code of Construction Practice

The Council welcomes the submission of a revised CoCP document by the Applicant

for Deadline 1, but the following key concerns remain:

- Uncertainty over a receptor site for the excavated material remains of concern to the Council, and it has not been made clear by the applicant what flexibility there may be for an appointed contractor to vary the river transport commitments based on the identified receptor site's suitability to receive material by barge. Ideally, the receptor site should be identified prior to approval, and the quantum of material transported by each mode and the routes to be used specified in a DCO Requirement. Failing that, further reassurances over the contractor's inability to significantly vary any commitments made by the applicant once appointed will be required. The Council would also seek justification regarding the assumption that material re-used on site can be classed as having been transported by river.
- From previous discussions it is understood that the Silvertown site spoil lay down area will provide 2.7 days of storage based upon TBM excavation estimates. The Council would seek assurances from the Applicant, based on similar projects' excavation rates and rates of removal by river, that this is sufficient storage to prevent Additional Derogations becoming common practice.
- The additional commitment to safeguarding against the use of local roads is to be welcomed (3.1.4) but early agreement on specified lorry routes remains desirable before Scheme approval, and in such a case, subject to a DCO Requirement.
- New commitments on lorry safety and the specification of high visibility cabs is commendable, as the current model of 4 axle tipper truck is disproportionately represented in cycle fatalities across London. However, there is currently no contractor that would be capable of meeting this commitment, and without legal compulsion (which does not seem imminent), it is unlikely that any contractor would have a sufficiently large fleet by the start of the construction of the Scheme to meet this commitment either. Once again, the question for the Local Authorities concerned is what degree of contractor optimisation will be permitted, resulting in a weakening of this commitment at start of construction? There needs to be an alternative presented, recognising the

likelihood that no contractor will be able to meet this requirement in full, and detailing what other safety measures will be required of contractor's vehicles. (eg cycle safety cameras/proximity sensor detection systems, high visibility mirrors, driver training standards etc.)

- The requirement for FORS Gold accreditation is welcomed, but considered standard for a scheme of this high a profile.
- The Council also welcomes the removal of parking provision for construction workers from the Scheme (with parking provision now limited to operational contractor's vehicles), and the requirement for both the Workforce Travel Plan and the Construction Transport Management Plan (as sub-documents of the CoCP) to be approved by the Local Authority. The introduction of extensive parking controls in the area by the Council early next year will assist with the achievement of Workforce Travel Plan targets.
- The Council welcomes the change to Saturday operating hours to 13:00 finish. (Section 2.3.1). The Council also notes that all construction works will require approval pursuant to Section 61 of the Control of Pollution Act 1974, and that activities that are permitted within the "shoulder hours" must form part of any Section 61 agreement reached between the Council and the contractor.
- In response to paragraph 11.2.3, the Council maintains that all works will be re-assessed in accordance with BS 5228, not just night works.
- The Council takes the view that provisions for sound insulation or temporary rehousing should be secured if noise levels experienced are greater than those predicted.

7.0 Further comments on Written Representations

The Council has viewed the Written Representations and Local Impact Reports submitted by others with interest, and notes the degree of commonality across many of the concerns expressed regarding the Scheme.

While it is neither appropriate nor practical to comment on all the submissions made, the Council would wish to highlight three submissions and provide its own comments on those.

The Corporation of London and the London Borough of Southwark.

Both the Corporation of London and the London Borough of Southwark have concerns that at present Category A vehicles use the existing crossings within those boroughs. These boroughs believe that there is the opportunity at Silvertown Tunnel to encourage Category A vehicles to use the Silvertown Tunnel and thereby reduce the impact of these types of dangerous vehicles on CoL's and LBS's roads and central London. Both boroughs would therefore like to support the following section

the City of London's Relevant Representation and request that the Silvertown Tunnel be constructed and operated with Category A designation.

The Council's response to this request is as follows:

Tunnels are a safety critical environment in which major dangers such as explosions, fires or release of toxic gas/liquid could result in significant numbers of victims and/or serious damage to the asset. Dangerous goods bring added risks and the Carriage of Dangerous Goods and the Use of Transportable Pressure Equipment Regulations, 2009 (CDG Regulations) requires the relevant authority to apply an appropriate designation to a road tunnel from Category A, where there is no restriction on the transport of dangerous goods, to Category E, where there is an effective restriction on all dangerous goods.

In determining the appropriate designation for the Silvertown Tunnel TfL undertook a detailed review of the available evidence and held discussions with the Tunnel Design Safety Consultative Group (TDSCG) which has been established for the scheme to advise on design and operational matters. The TDSCG includes representation from the Metropolitan Police, Fire and Ambulance services, together with other incident responders and the relevant Local Authorities. This resulted in the decision in May 2015 to designate the Silvertown Tunnel as a category E tunnel. The designation is the same as that which applies to the Blackwall Tunnel. The rationale for this decision was based on the operational difficulties associated with permitting dangerous goods vehicles to use the new tunnel and the risk of encouraging vehicles carrying dangerous goods traffic from outside London. In summary, the rationale is as follows:

- The shared southern approach road of the new tunnel with the Blackwall Tunnel means that assigning a different category to Silvertown creates operational risks, as permitting dangerous goods vehicles to use this corridor increases the likelihood of such vehicles attempting to use Blackwall Tunnel, with consequential risks, either 'accidentally' or in the event of an incident or temporary closure of the Silvertown Tunnel.
- Permitting dangerous goods vehicles to use Silvertown Tunnel would, in all

likelihood, result in a proportion of these vehicles diverting into east/south-east London from outside of London (i.e. M25/Dartford Crossing). The northbound Dartford Crossing tunnels are designated as category C (Restrictions for dangerous goods which may lead to a very large explosion or a large toxic release) hence accessible to only limited dangerous goods traffic. Dangerous goods vehicles that are permitted have to be escorted through the tunnels which can add considerable journey time to trips made via this crossing; hence the possibility of an un-escorted trip via Silvertown Tunnel would represent an attractive option for trips that are well served by the A12 or A13 corridors.

- Whilst designating Silvertown Tunnel as a category C tunnel (i.e. the same as the northbound Dartford crossing tunnel) could represent a potential option for limiting diversions from elsewhere, there would be the requirement for significant extra land for a holding area and associated additional operating costs from an escorted service. There is also currently no means of reliability enforcing such a restriction. This would bring added risk to the crossing from dangerous goods vehicles (some would be permitted, others wouldn't, and there is no reliable and practical way of telling the two apart), and bring with it significant operational challenges.
- Information available indicates that the number of dangerous goods vehicles using road crossings in London is proportionally very low (in the order of 1% of overall traffic), and there is no evidence of a particular problem with dangerous goods vehicles at Tower Bridge (the nearest unrestricted crossing to Silvertown) or other central London bridges.
- In developing the proposals for the scheme, due regard was given to views from a wide range of stakeholders, with the management of goods vehicles at Silvertown Tunnel being a key area of interest. Allowing dangerous goods vehicles to use the Silvertown Tunnel would be of significant concern to a number of stakeholders for the reasons outlined above.

The Council would therefore strongly oppose the suggestion by the Corporation of London and the London Borough of Southwark for the Silvertown Tunnel to be classified as Category A.

Port of London Authority

The Council notes with interest the submission made by the PLA and concurs with the majority of the representations made.

The Council defers detailed issues of wharves, river wall maintenance, dredging, impacts on navigable channels to the PLA who are the experts in this area, and is happy for them to lead on these aspects of the representations to the ExA.

Of particular concern is the potential relocation of the Keltbray and Euromix operations, currently operating from safeguarded and unsafeguarded wharves respectively on the future Scheme worksite, which will require relocation as a result of the Silvertown Tunnel Scheme.

The Council's view on this issue is as follows:

- The Council shares the concerns over the potential loss of these wharf operations and the possible transfer of approx. 450,000 tonnes of material from river transport to road transport.
- While these operations may be relocated some distance away, and quite likely in another Borough, there will nevertheless be associated impacts with the relocations, which are a direct consequence of the Scheme.
- Specifically, should a riverside location with wharf capacity not be found to accommodate these users, the additional vehicles associated with the road transport of this material (compared to the river based operations at present) must be included as construction impacts of the Scheme and assessed as such.

The Council also shares the PLA's view that the Applicant should play take responsibility for identifying appropriate sites for the relocation of these operations in order to minimise the construction impacts, albeit indirect, of the Scheme.

CABINET

**Meeting held on 3rd November 2016
in Council Chamber, Newham Town Hall, East Ham, E6 2RP**

Present: Sir Robin Wales (Chair)

Cabinet Members Councillors Lester Hudson, Ken Clark, Lakmini Shah, Quintin Peppiatt, Forhad Hussain and Rachel Tripp

In attendance:

Mayoral Advisers Councillors Andrew Baikie, Ayesha Choudhury, Ian Corbett, Richard Crawford, Clive Furness, Terry Paul and Julianne Marriot r

Other Members: None

Apologies: Councillor Frances Clarke, David Christie, Patrick Murphy and Joy Laguda MBE

The meeting commenced at 5.00 p.m. and closed at 5.38 p.m.

1. Management of the Business of the Meeting

The Mayor agreed to consider **Item 4 - Transfer of The Good Support Group as a small business** and **Item 5 - Transfer of the Pest Control service as a small business** at the end of the meeting to allow for Councillor Christie, who had given apologies for lateness to contribute.

The Mayor welcomed Priya Javeri, Director ICT Services to her first Cabinet meeting.

The Mayor advised Members that the meeting of Cabinet and Mayoral Proceedings scheduled for 1st December 2016 would be re-scheduled to 15th December 2016.

2. To consider the extent, if any to which the public and press are to be excluded from the meeting

The following items were exempt by virtue of the relevant exemption paragraph of the Access to Information Procedure Rules set out in the Constitution pursuant to Schedule 12A Local Government Act 1972, as amended:

Appendix 1 for Agenda item 4 - Transfer of The Good Support Group as a small business - (Exclusion paragraph 3)

Appendix 1 for Agenda Item 5 - Transfer of the Pest Control service as a small business- (Exclusion paragraph 3).

3. Declarations of Interest

There were no declarations of interest.

4. Transfer of The Good Support Group as a small business

The Mayor in consultation with Cabinet received this report which sought approval of the transfer of council services currently referred to as 'The Good Support Company', 'Cumberland Unit' and 'Branching Out @ Dongola Road' as a wholly council owned company, trading as The Good Support Group Ltd.

Decision

The Mayor in consultation with Cabinet agreed:

- i) The transfer of Council services currently referred to as 'The Good Support Company', 'Cumberland Unit' and 'Branching Out @ Dongola Road' to The Good Support Group Ltd (the Company), a Company Limited by Shares which will be wholly owned by the Council on the terms set out in the Business Case and Heads of Terms, as set at Appendices 1 and 2 of the report respectively;**
- ii) The effective target date of transfer would be on or after 1 February 2017;**
- iii) To delegate authority to the Director of Financial Sustainability to take all actions required to give effect to the Mayor's decision, including the incorporation of the company in consultation with relevant Members and the Director of Legal and Governance (or his nominee) including any necessary changes to the Business Plan and Heads of Terms.**
- iv) To note that an application would be submitted to the Investment and Accounts Committee to seek approval for admitted body status for the Company; and**
- v) To waive rules 10 (pre tender approval) and 11 (requirement to tender) Contract Procedure Rules and Contracts Standing Orders paras 2 (e tendering), 4.3 (gateway panel) 6 (roles and responsibilities), and 22 (award on price quality split) set out in the Council's Constitution to the extent necessary to award contracts to the Company in order for it to undertake the**

business transferred.

Reasons for the Recommendations

To enable the transfer of the council services currently referred to as 'The Good Support Company', 'Cumberland Unit' and 'Branching Out @ Dongola Road' to a Company Limited by Shares which will be wholly owned by the Council.

5. Transfer of the Pest Control service as a small business

The Mayor in consultation with Cabinet received this report which sought approval to the transfer of the council service currently referred to as Pest Control as a wholly council owned company, trading as The London Network for Pest Solutions Ltd.

Decision

The Mayor in consultation with Cabinet agreed:

- i) The transfer of the council service currently referred to as 'Pest Control' to a Company, which will be wholly owned by the Council in accordance with the provisions of the Business Case and Heads of Terms, as set at Appendices 1 and 2 of the report respectively;**
- ii) The effective target date of transfer would be on or after 3 January 2017;**
- iii) To delegate authority to the Director of Financial Sustainability following consultation with the Director of Legal and Governance (or his nominee) to take all necessary steps to give effect to this decision including any necessary changes to the Business Plan and Heads of Terms;**
- iv) To note that an application would be submitted to the Investment and Accounts Committee to seek approval for admitted body status for the Company; and**
- v) To waive rules 10 (pre tender approval) and 11 (requirement to tender) Contract Procedure Rules and Contracts Standing Orders paras 2 (e tendering), 4.3 (gateway panel) 6 (roles and responsibilities), and 22 (award on price quality split) set out in the Council's Constitution to the extent necessary to award contracts to the Company in order for it to undertake the business transferred.**

Reasons for the Recommendations

To enable the transfer of the council service currently referred to as 'Pest Control' to a company wholly owned by the Council.

6. Approval of funding for 2016/17 expenditure on the East Ham Town Hall project

The Mayor in consultation with Cabinet received this report which sought approval to spend capital on repair and refurbishment works to protect the long term condition and use of the East Ham Town Hall building and environs.

Decision

The Mayor in consultation with Cabinet agreed

- i) To approve capital spend of £6.325million on repair and refurbishment works to protect the long term condition and use of the East Ham Town Hall building and its environs as set out in paragraph 2.3 of the report; and**
- ii) To note that the various repair and refurbishment works proposed were below the EU procurement threshold and that all works would be procured as required by the Council's Standing Orders in force at the time.**

Reasons for the Recommendations

- 1. In order to ensure that the investment proposed reflects the priorities of the Mayor and Members and to secure the beneficial use of this building and to prevent further deterioration.**
- 2. In order to ensure compliance with the Council's Standing Orders.**

7. Additional TfL-funded Cycling Quietway Route – CS3 to Barking (Spur Road and Jenkins Lane)

The Mayor and Cabinet noted that this report was withdrawn.

8. Maryland Station Crossrail Public Realm and Interchange Improvement Scheme - Detailed Design and Implementation

The Mayor in consultation with Cabinet considered this report seeking approval to progress this scheme through detailed design to implementation. Approval had been given by Cabinet on March 19th 2015, to progress to this stage.

In discussing the report Members expressed concern over the suitability of

the proposed passenger drop off point and asked whether it could be relocated. The Mayor said that he was happy to agree the recommendations but wanted a discussion with officers and other members around the proposed passenger drop off point.

The Mayor in consultation with cabinet agreed:

- i) To approve the finalised scheme subject to officers discussing the location of the passenger drop off point with the Members of the Highways and Traffic Major Projects Board;**
- ii) To note**
 - (a) the successful completion of an extensive public consultation exercise to seek views on the proposed scheme for Maryland station, and the Consultation Report summarising the key issues raised by respondents, and**
 - (b) the design changes to the consultation proposal (shown at Appendix D of the report) made as a result of comments received, which now form the final scheme**
- iii) To grant delegated authority**
 - (a) to the Head of Commissioning (Highways and Traffic), after consultation with the Mayoral Adviser for Environment and Leisure and the Highways and Traffic Major Projects Board, to progress the Maryland Crossrail public realm and interchange improvement scheme to detailed design and implementation, and**
 - b) to the Head of Commissioning (Highways and Traffic), after consultation with the Mayoral Adviser for Environment and Leisure and the Highways and Traffic Major Projects Board, to progress the associated Traffic Orders required for the implementation of the scheme**

Reasons for the Recommendations

Bids to the TfL/Crossrail CCM Programme were submitted by the Council for public realm and interchange improvement schemes outside Maryland, Forest Gate and Manor Park Crossrail stations in July 2014, and full funding for all three schemes was awarded by TfL in November 2014. Funding was released by TfL in April 2015 to take forward the preliminary design and consultation exercises for the schemes, with Maryland the last of the three Crossrail schemes in the borough to be progressed.

Further funding is now available via the TfL funding portal from 1st April 2017 to commence the detailed design for the Maryland scheme and this is required to be spent or committed in 2017/2018, with further implementation funding to follow in 2018/19. Cabinet approval is therefore sought in order to ensure that the detailed design and implementation of the Maryland scheme can commence in full to ensure full spend of the TfL allocation.

9. Silvertown Tunnel Development Consent Order (DCO) – Submission of LBN Local Impact Report

The Mayor in consultation with Cabinet received this report which informed Members that TfL was following the Development Consent Order (DCO) route in order to secure planning consent for the proposed Silvertown Tunnel, following the designation of the project as a Nationally Significant Infrastructure Project by the Secretary of State for Transport on the 25th of June 2012. The final planning decision would be made by the Secretary of State for Transport. The Planning Inspectorate (PINS) appointed as the Examining Authority, would make a recommendation to the Secretary of State following a six month examination process which commenced on 11th of October 2016.

The report presented the Council's Local Impact Report (LIR) on the Silvertown Tunnel Proposals, which set out a number of identified impacts on the Borough of the proposed Silvertown Tunnel. In addition, the LIR included the Council's strong views on discounts on user charging for Newham residents, the role of the Emirates Airline to supplement the proposals and the early delivery of a road crossing at Gallions.

In discussing the report Members raised a number of concerns and were not convinced that the Silvertown Tunnel was the best option for Newham and East London. The Mayor and Members commented that if the Silvertown Tunnel was to go ahead the whole of London should bear the cost of construction and or tolls should also be imposed on crossings in West London. The Mayor and Members were of the view that a better option would be a crossing at Gallions.

Members noted that the report set out ten points that the Council would like to see resolved before the proposal for the Silvertown Tunnel could be fully supported. Members also raised concerns over increased HGV movement during construction of the Tunnel, increased traffic on Silvertown Way and the impact it could have on other developments.

The Mayor commented that whilst the report set out the Council's position he wanted TfL to be advised that Newham could not fully support the proposal for the Silvertown Tunnel unless the issues raised were resolved. The Mayor added that he wanted a communication published for residents summarising the Council's position.

Decision

The Mayor in consultation with Cabinet agreed:

- i) To note the TfL submission to PINS for a Development Consent Order to construct and operate the Silvertown Tunnel scheme;**
- ii) To the submission of the Council's Local Impact Report which summarised the positive, neutral and negative impacts of the scheme on the borough (attached at Appendix A);**
- iii) That TfL be advised that until the Council's concerns set out in the Local Impact Report are resolved the proposal would not be fully endorsed;**
- iv) That a communication to local residents, setting out the Council's concerns on the proposal be published;**
- v) To grant delegated authority to the Director of Planning and Regeneration in consultation with the Cabinet Member for Building Communities, Public Affairs, Planning and Regeneration to make representations to the DCO hearings and seek agreements with TfL over key concerns on behalf of the Council; and**
- vi) To note the DCO timetable, with the DCO hearing ending by 11th April 2017 and a decision issued by PINS/Secretary of State by 11th October 2017.**

Reasons for the Recommendations

A key submission to the DCO hearing is the Council's Local Impact Report (LIR). In coming to a decision, the Secretary of State must have regard to any LIRs that are submitted, and Local authorities are therefore strongly encouraged to produce LIRs when invited to do so. PINS have invited the Council to submit a LIR by 15th November 2016.

10. Treasury Management Strategy Annual Report 2015/16

The Mayor in consultation with Cabinet received the Annual Treasury Management Report 2015/16 which had been produced in line with the Council adopted Chartered Institute of Public Finance and Accountancy (CIPFA) Code of Practice on Treasury Management ("the Code").

The report highlighted that the Council's combined investment and debt portfolio totalled £1.18bn of risk with a turnover of investments of £1.7bn at the year ending 31st March 2016.

Decision

The Mayor in consultation with Cabinet noted the report

Reasons for the Recommendations:

The annual treasury management report is a requirement of the council's reporting procedures and recommended by both the TM Code and the CIPFA prudential code for capital finance in local authorities. The council is required to comply with both codes through regulations issued.

11. Items scheduled on the Forward Plan for this meeting that have not been submitted

The Mayor noted:

1. the items originally scheduled for this meeting of Cabinet but which were not submitted, together with the reason for the delay and the rescheduled date; and
2. those items listed on the Forward Plan scheduled to be considered at the next meeting of Cabinet.

12. Local Government Act 1972, as Amended by the Local Government (Access to Information) Act 1985 - Exclusion of Press and Public

Exempt Appendix 1 for Agenda item 4 - Transfer of The Good Support Group as a small business

Exempt Appendix 1 for Agenda Item 5 - Transfer of the Pest Control service as a small business

**The London Borough of Newham Oral Submission – ISH on Traffic Modelling,
Wed. 7/12/16**

The following is a written summary of the material presented orally by Mr Murray Woodburn in respect of the traffic and highways and Mr James Burton in respect of the Council policy, on behalf of the London Borough of Newham at the Issue Specific Hearing on Traffic modelling on 7th December 2016.

Agenda Item 2 – Case for the Scheme

The Council agrees that there is a need for additional river crossing capacity for both vehicles and public transport in the east sub-region, in order to support growth and provide additional cross river connectivity. However, the Council has always seen this as being delivered by a package of river crossings, and not by a new tunnel crossing at Silvertown alone.

The Council acknowledges that a lack of network resilience and frequent incidents at Blackwall have a detrimental effect on the highway network on the north side of the river. However, the Council considers that technological solutions exist which could minimise the wider effects of incidents, and that the occurrence of frequent incidents at Blackwall alone do not justify the need for the Scheme.

The Council's view remains that, if Silvertown is to be implemented, it must be as a package of new river crossings for the east sub-region and not a single solution.

The Council's consider that, the Scheme delivers limited benefits to Newham users while imposing potentially significant impacts on the borough. Its position is therefore somewhat different to that of RBG and LBTH, who both experience significant improvement to congestion and air quality at the existing Blackwall tunnel portals.

The contribution towards regeneration objectives achieved by the Scheme are also questioned by the Council. Improved connectivity across the sub-region is not achieved by constructing a new crossing in the immediate vicinity of an existing one. Despite the large number of projects coming forward, there are few regeneration sites in Newham which would benefit directly from the Silvertown scheme. The Council remains of the opinion that a greater regeneration contribution would be made by a crossing further east, connecting the major opportunity areas of the Royal Docks, Barking Riverside and Thamesmead.

While the Council has previously shown support in principle for the Scheme, concerns over the DCO submission documentation combined with TfL's diminishing commitment to a package of additional crossings have resulted in a re-positioning of the Council's stance on the Scheme. The support was with a package of river crossings and not a single tunnel.

While the traffic and environmental modelling remains, in the Council's view, incomplete and insufficiently robust to draw any conclusions on the likely scheme impacts on Newham residents and businesses in advance of implementation, the Council's position is one where it remains to be convinced of the merits of the scheme in relation to its impacts and is currently not in support.

Agenda Item 3 – Need for the Scheme

Development and related objectives • Current Transport and traffic conditions and future challenges • Background demographic and socio economic conditions and trends; economic, development and land use assumptions and projections

The Council has concerns over the nature of the highway network on the north side, and how the proposed Scheme connects into it. Unlike on the southern tunnel approach, where there is a merge from a high capacity dual-carriageway and very limited route choice, the northern tunnel portal connects to a junction, which offers a number of route choice possibilities. A relatively lightly trafficked highway network with generous geometry links the proposed tunnel portal with the A406 and A13 to the east. Similarly, a connection to the A13 and Barking Rd can be achieved at Canning Town via Silvertown Way. The potential for route choice and therefore traffic diversion and potentially wider traffic impacts are therefore of greater concern on the north side of the Highway Network.

This area is a major regeneration area, with Enterprise Zone status and there will be emerging residential and employment neighbourhoods in this area in the future which will require to be protected from the adverse effects of any diverting traffic. These will be road safety impacts, congestion impacts and environmental impacts. These impacts will also be evident during construction. It is also important that the full build-out of the development zone is not hindered by any erosion of the network capacity serving the area as a result of diverting tunnel traffic.

There is also some concern on the Council's part regarding displacing westwards to access the A13 at Canning Town. The Canning Town and Custom House area is one of the Council's main regeneration projects and a new town centre is being created at the Barking Road junction with the A13. Recent junction changes have been made to create more public space and support town centre activity, and additional traffic in this area as a result of tunnel traffic is of significant concern.

The Woolwich Ferry operates at capacity almost throughout the day and is limited by restricted hours of operation and occasional poor weather. Although nominally connected to the A406, in fact the last section of the route to the ferry through Newham is through residential areas on Woolwich Manor Way and Pier Road. The impact on residents in this area as a result of tunnel traffic (particularly HGVs) is

already acute. Therefore, the potential of any further traffic attempting to use the Woolwich Ferry because of the introduction of tolls at Blackwall and Silvertown is of real concern to the Council.

Growth in the sub region is projected to be larger than anywhere else across London, and the regeneration plans for Canning Town and Custom House, The Royal Docks EZ, Barking Riverside, Thamesmead, Charlton Riverside, Greenwich Peninsula and Isle of Dogs will deliver substantial contributions to London's growth targets. Up to 2041, Newham's population will increase by about 250,000 people and up to 40,000 new jobs will be created. Over 14,000 housing units will be delivered in the next five years alone.

It is considered by the Council that the reference model takes account of this scale of growth across the sub-region adequately in its future land use and trip generation assumptions. The scale of growth may actually exceed projections, so the reference case model may be conservative with its growth assumptions.

It is important however that the proposed Scheme does not *adversely* affect the delivery of this growth, and that new neighbourhoods, schools and other social infrastructure do not suffer from a poor environment as a result of tunnel traffic.

Newham has particular socio-economic characteristics worthy of mention. It has some of the lowest ranked wards in the whole of the UK in terms of multiple deprivation indices, and is the 4th lowest ranked local authority in the London. Some of the Borough's most deprived wards are in the immediate vicinity of the Scheme (Canning Town, Custom House, Royal Docks & Beckton).

Car ownership is low (almost half of Newham households do not have access to a car), so any benefits for this group will be realised through improved cost effective public transport opportunities. However, these benefits must not be offset by a deterioration of their traffic or environmental living conditions.

Agenda Item 4 – Policy context

National, London wide and Local Planning and Transport Policy Contexts

As set out within the Chapter 4 of its Local Impact Report, the Council considers the Local Development Plan to be Important and Relevant. By way of context, the northern portal would be located in the 'arc of opportunity' opportunity area, which stretches north to the Olympic park, and east along the Royal Docks. The Council is mindful that Olympic Legacy and the regeneration within this opportunity area is of national significance, and is described in the London Plan as "the single most important regeneration project for the next 25 years".

The Local Development Plan lends support to safeguarded river crossing routes at both West Silvertown and Gallions Reach subject to an assessment which includes;

- contribution to sustainable development and regeneration
- attendance to the environmental impacts including community/public safety, noise, vibrations and odour and the legacy of contaminated land.
- extent of additional traffic impact on the locality and to which congestion can be reduced.
- bearing on employment levels and poverty

At Borough level, the Newham Core Strategy supports ongoing investment into strategic transport proposals that contribute towards the Boroughs regeneration, economic and physical development. Indeed the Core Strategy's overriding priority is to build communities that work, and ensure that growth contributes to achieving convergence.

While the principle of a package of river crossings are supported, they are so on the balance of acceptability of considerations which include socio-economic, health and environmental implications of the proposals.

It is the view of the Council that the current Scheme does not demonstrate that these considerations achieve the required balance.

Agenda Item 5 - Traffic and Transport Models

Modelling framework and strategic model structures – • parameter specification and estimation process, and validation and other checks; • model inputs and outputs; • data issues; • key assumptions; • Model performance; • Local Modelling.

Common issues across all Host Boroughs

The following issues are all agreed by the Host Boroughs and London Borough of Tower Hamlets and in the interests of hearing expediency will only be presented once by the Council under item 5. However, these issues are also representative of the concerns of Royal Borough of Greenwich and London Borough of Tower Hamlets and should be considered as if being presented by those authorities also although they have additional issues which will be articulated separately.

Firstly – the Base case is considered to be assessed as fit for purpose. Although it should be noted that, despite claims to the contrary by the Applicant, the Council consider that the model **did not** replicate traffic displacement as a result of simulated incidents at Blackwall, suggesting a possible assignment issue, which is not uncommon for SATURN in congested conditions. This causes the Council some

concern for the future model projections where the base network is significantly more congested.

Secondly – the Reference case is considered to be assessed as fit for purpose, with realistic growth assumptions included, although obviously, no verification of the model performance *against reality* is possible.

Thirdly – the Assessed case is NOT agreed, for the following reasons:

1. The value of time used in the model to determine the traffic assignment based upon the generalised cost of available routes is an average national figure, and does not reflect the specific socio-economic characteristics of the East London sub-region, where indices of deprivation are well above the national average. London values are available, and it would also have been possible to adapt these further to the east/south east sub region. The applicability of the values of time used must be fully demonstrated as appropriate for the area in which they are applied.
2. The behavioural response of drivers across user groups to user charging cannot be validated. While it is acknowledged that the assessed case model behaves 'as expected', in that an increase in tolls results in a reduction in demand, and vice-versa, the Host Boroughs cannot be confident that the elasticity of demand across various user groups has been precisely evaluated, and that the prediction of the actual numbers of vehicles at different levels of toll are accurate or to what extent they are likely. No stated preference, discrete choice or similar surveys or modelling across different socio-economic and road user groups have been undertaken by TfL to calibrate these varying behavioural responses to different tolling levels suggested by the model, so the assessed case model cannot be validated in the same way as the base and reference case models.
3. While the Host Boroughs acknowledge that any model will only produce a single result within a range of possible outcomes and should always be interpreted as such, the applicant has been unable to indicate where in that range of possible outcomes the assessed case model outputs are placed. No 'confidence level' associated with the outputs is discussed or presented.
4. The demand prediction at varying toll levels is further complicated by the socio-economic grouping of existing tunnel users against those of the surrounding communities, and the modelling does not attempt to evaluate the complex social impacts of a user charge across different socio-economic user groups and businesses. This is a key concern regarding the scheme for the Host Boroughs and these impacts must be more robustly evaluated and identified

5. By the Applicant's own admission, predicting the behavioural response of different highway network user groups to the introduction of a road user or toll charge is an inexact science - especially when only a traffic model (i.e. without a behavioural sub-model) is used. The Applicant's own expertise (as opposed to those of their consultants) in modelling situations of this sort is unclear (the Congestion Charge scheme, for example, is not considered similar to a tolled link such as a bridge or tunnel), but their recent record of modelling river crossing interventions in this geographical area is not good. The demand modelling for the DLR Woolwich International Extension underestimated the resultant demand on opening by over 120%. Less than half the trips generated were predicted beforehand by the modelling, and it required a substantial revision of the DLR timetable following the first week of implementation to operationally address the modelling shortcomings. The Applicant's previous attempt to model a highway crossing in the area (Thames Gateway Bridge) was heavily criticised by the Planning Inspectorate at the Public Local Inquiry for that scheme and was considered weak in a number of areas, including the modelling of public transport. These examples do not build confidence amongst the host boroughs in the expertise that the Applicant claims to have, and there may be inherent difficulties in predicting cross river trips in this part of London due to the high levels of trip suppression and the sub region's complex socio economics.
6. In a Host Boroughs issues tracker document (which will be submitted by the Council at Deadline 2), the Applicant has admitted to the Host Boroughs....." in this the Applicant acknowledges that there remains an inherent challenge in forecasting this kind of response and it remains possible that elasticities (willingness to pay) has (*sic*) the potential to be higher or lower than assumed in the assessed case. This is a key argument for the proposed flexible charging power, to ensure that the scheme can respond effectively to circumstances which can never be conclusively modelled..." This is almost a clear admission that the assessed case modelling is *known* by the applicant to be just one of a range of possible outcomes.
7. It has also been admitted by the Applicant that....."the complexity and inter-related nature of the aforementioned choices and considerations affecting Scheme impacts has meant that it is not possible to isolate the precise impact of any one factor individually on highway demand with any degree of accuracy."
8. In the light of these wide-ranging admissions by the Applicant, and in order to demonstrate due diligence on behalf of residents and businesses who may be affected by the scheme, the Host Boroughs have no option but to view the highway and environmental impacts as presented in the DCO submission

documents with little confidence, and as just one possible outcome in a wide range of possible outcomes. Consequently, the Host Boroughs must consider a 'what if' scenario, where the impacts presented are actually worse in reality, and what appropriate and effective mitigation measures, if any, would be available to address these.

Local modelling

While a VISSIM microsimulation model was built by the applicant in order to identify potential local impacts and possible mitigations, this has not been subjected to the same audit process as the strategic models and no validation report has been made available. It is understood that no base microsimulation model was ever prepared, so its performance against observed conditions was never evaluated. An example is that no journey time validation process was undertaken.

In addition to this irregularity, it is also normal TfL procedure to require local future year models (particularly those that suggest mitigations) to be re-run in the strategic model with coding changes as necessary, and the effect of any wider reassignment as a result of those changes evaluated. The outputs from this *second* iteration of the strategic model are *then* used as the demand flows for the local model, from which conclusions on local impacts can then, and only then, be drawn.

This iteration has been omitted, and it is highly irregular and certainly not best practice for a local model to take flows directly from a single run of a strategic model. Ironically, TfL are requiring an iterative approach to the use of a variant of the RXHAM model for the Borough's Stratford Gyrotory removal scheme, with the local mitigations requiring to be re-fed into the strategic model to evaluate any further reassignment. TfL would not approve the modelling on that scheme until this step was completed.

Therefore, the Applicant's approach to local modelling is inconsistent with what they require of others at best, and poor practice at worst. In either case, there can be little confidence given to the local modelling results as a consequence of their incomplete approach.

Finally, the extent of the microsimulation model area was not agreed with the Host Boroughs, and a number of key junctions of concern to the Host Boroughs were not modelled and the local impacts in these locations therefore not identified.

The Host Boroughs have agreed to provide a plan of these additional locations where local modelling was not undertaken to the Examining Authority at Deadline 2.

Agenda Item 6 - Independent Advice on and Audits of Applicant's Traffic and Transport Models

- **Terms of reference;**
- **Assumptions and approach;**
- **Findings and recommendations and implementation.**

The Host Boroughs acknowledge that all 3 RXHAM Models have been built according to DfT WebTAG guidance on strategic models and are behaving in a manner that would be expected. The three models have been audited by Steer Davies Gleave who have confirmed this.

However, WebTAG contains no *specific* guidance on modelling user charges or road tolls, so the Host Boroughs cannot determine the appropriateness or otherwise of the methodology to define a level of toll and to evaluate demand elasticity in order to generate a demand prediction. And little has been provided by the Applicant to provide some reassurance on the methodology adopted.

Additionally, the concerns over the appropriateness of the value of time assumptions expressed previously remain. National Values of Time are used, but which version of these is unclear, and there is no discussion of why London Values of Time, which would seem more appropriate, were not used. Furthermore, there are particular socio-economic characteristics of the sub-region that may suggest more area-specific values of time should have been derived, to more accurately reflect the deprivation and car ownership levels across large proportions of the Host Boroughs and the wider study area.

It is important to note that the SDG traffic model audits specifically *did not* cover the issue of how charge levels were derived, nor the relationship between any charge and the specific values of time applicable in the local area.

These issues generate considerable alarm about equity across the Host Boroughs, who remain concerned that more economically disadvantaged residents will be impacted disproportionately by a user charge and that additional local connectivity will, in reality, be limited. In some cases, due to the introduction of a toll at Blackwall where one currently does not exist, the connectivity for these groups will actually be *reduced* as a result of the Scheme, and their place on the highway network will be taken up by those with a greater ability and willingness to pay, which are quite likely to be longer commuting trips. This does not sit comfortably with the objectives of the Scheme.

Agenda Item 7 - Key behavioural issues arising from Traffic and Transport Models

Implications for policy and assessment/appraisal of Interventions (strategies, programmes and measures) with particular reference to user charging, its impacts and effectiveness.

A key concern of the Council in this regard is the differential socio-economic impacts that the introduction of a charge to cross the river in the sub-region will have on residents and businesses. The Council believes there will be a clear equity issue, with economically disadvantaged residents and businesses suppressed from making cross river trips, and their place on the highway network being taken by more affluent commuters on longer distance trips with a greater ability to pay.

Business impacts are also of some concern, as clearly, businesses in the sub region will be carrying an additional cost compared to their equivalents elsewhere in London. While there may be some minor benefit to business from improved journey time reliability, journey times are affected only marginally in Newham, and any benefits are not set in the context of the need to pay to achieve these benefits.

There are of course, serious implications of the model not accurately predicting the demand associated with user charge levels. Under predicting demand would result in increased congestion, detrimental impacts on air quality and a subsequent worsening in the health and well-being of Borough residents. Over predicting demand, would 'over-suppress' trips and would have adverse social and economic impacts and fail to deliver the desired connectivity.

Unfortunately, the Council does not have sufficient confidence in the survey work and assumptions underpinning the relationship between the charge level and the corresponding level of demand to gauge which of these outcomes is more likely.

However, in the event that demand is under-predicted, and the elasticity of demand is overestimated, congestion in the Borough is of great concern. Impacts on Canning Town would have implications on the proposals for the town centre regeneration project, but the potential impacts on the Royal Docks enterprise zone are of even greater significance.

Any suppression of the maximum build out of the EZ as a result of the erosion of highway capacity and accessibility due to tunnel traffic will not only have very serious implications on regeneration targets but also has a major financial implication to both GLA and the Council. Reduced development scale will result in reduced income, and the overall Royal Docks Integrated Investment Plan could be jeopardised. Notably, one of the main beneficiaries of the development income-funded RD investment plan is TfL, as there are over £200m of DLR improvements proposed.

Agenda Item 8 - Model framework and model structures

Traffic and Transport Models, Air Quality Models/Tools and noise modelling • Interfaces between Traffic and Transport Models and Air Quality Models/Tools; • Vehicle fleet assumptions and projections; • Compatibility between Traffic and Transport Models and Air Quality Modelling/Tools and Guidance; • Uncertainties in relation to air quality assessment – modelling issues; • Apparent anomalies in noise modelling related to traffic modelling.

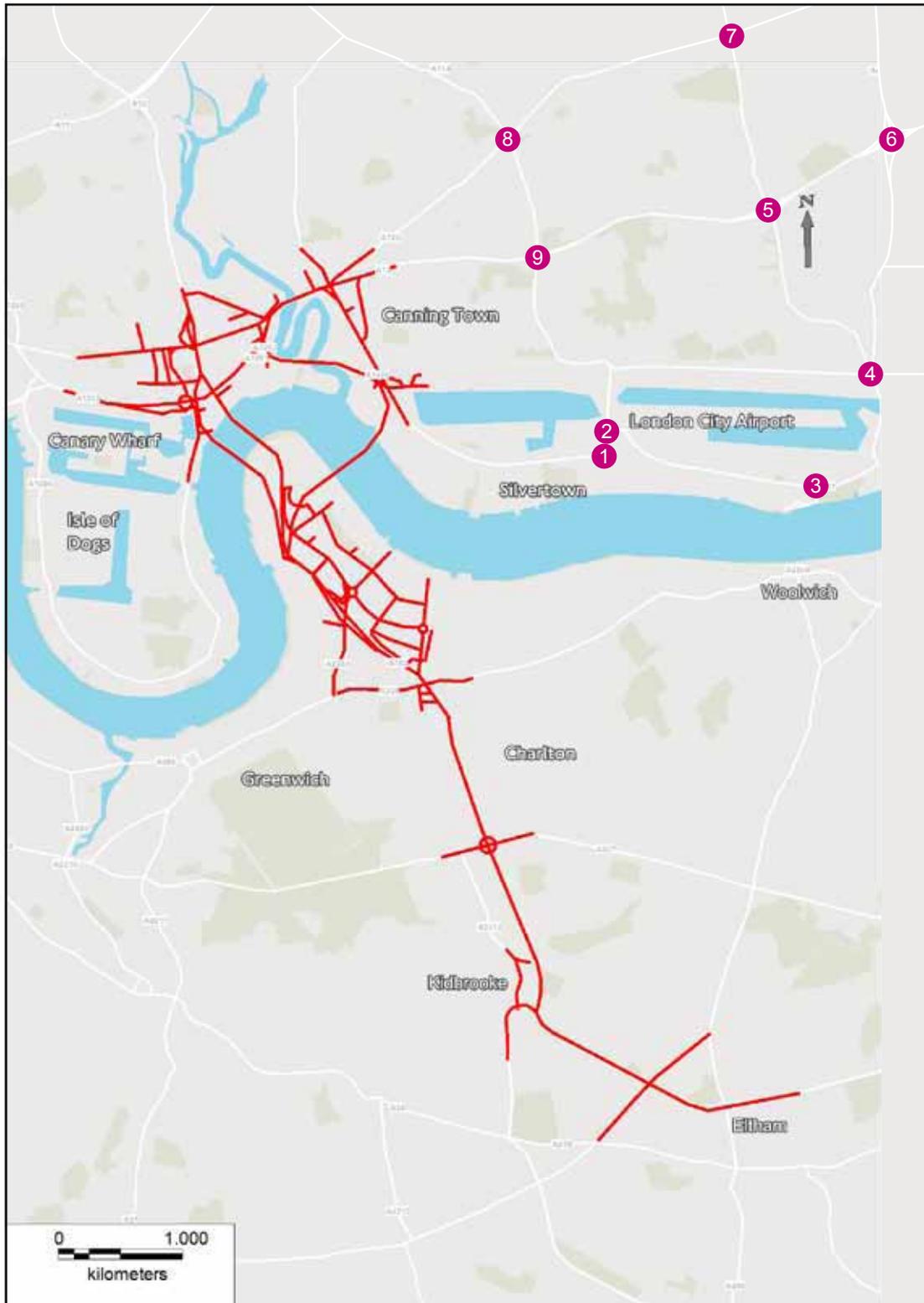
Fundamentally, the Borough's key issue remains with the accuracy of the demand projections that are produced from the traffic model, and since they form the main inputs to the subsequent noise and air quality models, the outputs from these must be considered with the same lack of confidence.

Additionally, as environmental models require flows to be aggregated into AADT and AAWT (and in some cases, annualisation), this further compounds any errors in the demand projections for peak and inter peak periods, there is an argument that the environmental model outputs are even less robust than those from the traffic model, as errors are multiplied. Relatively small underestimations of demand in a peak period are soon aggregated into much larger discrepancies when multiplied over a day, week or year.

This is of particular concern to Newham Council and noted by the Cabinet because so many locations are just hovering below the 'significant' level of increase and slightly higher flows would trigger required mitigations at a number of sites.

While these remarks conclude the Council's oral submission to the Issue Specific Hearing on Traffic Modelling, the Council wishes to retain the right to make further related submissions to subsequent Issue Specific Hearings as appropriate, and particularly, those covering construction impacts, user charging and impact mitigation.

VISSIM modelling scope



Additional Junctions of Concern to LB Newham

- | | |
|--|--|
| ① North Woolwich Road/Connaught Bridge | ⑥ A13/A1020 Royal Docks Road (Beckton roundabout) |
| ② Connaught Bridge/Connaught Road | ⑦ High Street North/High Street South/Barking Road |
| ③ Pier Road/Woolwich Manor Way/Albert Road | ⑧ Prince Regent Lane/Barking Road/Greengate Street |
| ④ Gallions roundabout | ⑨ Prince Regent Lane/A13 |
| ⑤ High Street South/A13 interchange | |

Theme	Issue ID	Issue Description	Raised by	TfL response	Borough Comments	Notes	Which doc does this appear in in the submission?	How secured	Agreed/ disagreed
Modelling	HB001	The performance of the traffic modelling is unknown/unverified	Newham (Greenwich, also raise other issues further down the spreadsheet that link back to this one.)	The audit of the base year model and reference case is now complete. All remaining caveats discussed in the sessions held with RBG/LBTH on 25th Feb and LBN on 2nd March, have now been resolved. Consequently, the six-borough steering group (which includes the three host boroughs) have agreed the model is fit for purpose as a forecasting tool, and SDG have issued their final reports for the base and reference case. The only part of the audit that is still outstanding is that of the Assessed Case, which focuses on the application of the model for our particular scheme rather than the suitability of the model itself. Based on correspondence to date with SDG we do not anticipate any significant issues with the assessed case model. SDG agreed to provide a report on the Assessed Case by the end of this week.	Base and Reference cases agreed by the boroughs. The lack of any additional cross river traffic in the reference case being due to the fact that in the base case the tunnel (and Rotherhithe and Woolwich) is already operating at full capacity. Assessed case is not agreed as providing an accurate prediction of the potential traffic volume due to 1. The lack of confidence in the model's ability to assess the effectiveness of the toll (see minutes of HB Mtg 21.716 point 16). 2. The lack of translation of predicted growth in the area into cross river trips (waiting on SDG meeting/comments)	Base and Ref Case Model Audit reports issued by SDG. Assessed Case report due WE 22/07/16		n/a	
	HB002	How critical the prediction of cost elasticities are in the assignment of trips to tolled and un-tolled crossings	Newham	The assumed elasticity of highway travel demand with respect to the level of the user charge is of significant importance to the assignment of trips in the model - just as the revealed elasticity of demand (which is sometimes described as 'willingness to pay') will be of importance once the scheme opens, as the relationship between price and demand ultimately underpins the effectiveness of all user charging schemes. The model assigns trips to specific routes based on generalised cost, which includes the cash cost of any charges applicable on that route as well as 'costs' associated with time and distance. Reflecting the fact that different users will place different 'values' on these costs, the model uses WebTAG values of time (which are effectively elasticities of demand) for multiple user classes. This enables a range of different income groups to be modelled, each with their own different values of time to reflect the fact that each income group will have a different sensitivity to price. Nevertheless, TfL acknowledges that there remains an inherent challenge in forecasting this kind of response and it remains possible that elasticities (willingness to pay) has the potential to be higher or lower than assumed in the Assessed Case. This is a key argument for the proposed flexible charging power, to ensure that the scheme can respond effectively to circumstances which can never be conclusively modelled - our understanding is that the Host Boroughs share this view. Sensitivity tasting of different values for the user charges (+20% in the high charge case, and -20% in the low charge case) provides a level of understanding of the implications of real elasticities of demand being up to 20% lower or higher than assumed in the Assessed Case respectively. Additionally, a further series of sensitivity tests to assess the impact of the DfT's proposed new values of time has been proposed once the DfT issue further guidance regarding the changes they propose to VOTs - our latest understanding is that the DfT will issue their new guidance in November. These two sets of tests provide a good indicator of how the model responds to VOT changes, and also of how the user charge could be adjusted to account for differences in revealed elasticities.	see above	SDG review of the Assessed case will include analysis of sensitivity to charging. Also, testing of new DfT values of time to be reported in a technical note.		n/a	
	HB003	Counter-intuitive outputs which cannot easily be explained (including that the local network will not get more congested in peak periods - it is congested already)	Newham	See response to HB001, plus: As set out in SDG's model audit, the modelling takes into account the GLA's projected growth in population and employment and hence, any additional traffic demand that this growth could generate independently of the Silvertown Tunnel Scheme. With regard to the scheme itself, our modelling has shown that the scheme will not result in any additional traffic overall and hence, no additional congestion is expected. This is because the user charge will act as an effective tool for managing demand, which can be adjusted if necessary.	KS: Even if the Assessed Case 'no additional vehicles' fig is accepted, what needs to be managed is the effect of the more concentrated peak(esp pm southbound) on local junctions	See response to HB001. With regard to the comment suggesting that "the local network will not get more congested in peak periods", are they referring to the effects of traffic growth over time (i.e. ref case vs base) re the effects of the scheme itself (i.e. assessed case vs		n/a	
	HB004	TfL should have done the model audit before consulting - outputs can only be considered as preliminary until that has been completed.	Greenwich, Newham, T Hamlets	See response to HB001.	KS: Above it is clear that the model cannot effectively predict the charge on TDM - at least initially	See response to HB001.		n/a	
	HB005	Microsimulation modelling required on local junctions	Greenwich	TfL has carried out a detailed 'example' assessment of localised traffic impacts based on the Assessed Case defined for the consultation and DCO application. This includes both strategic analysis and microsimulation modelling of local junctions in order to develop an enhanced understanding of potential issues and develop effective solutions. Based on this, TfL would anticipate that the Scheme would lead to some localised impacts on junction delays in the 2021 modelled year that could be mitigated against through measures that can be delivered within the existing highway boundary. Since London's road network and the pressures on it are going to evolve between the time of application and Scheme implementation, committing to junction specific mitigations is not appropriate at this stage and may in fact conflict with the objectives of later projects and programmes. Therefore, instead of committing to mitigation proposals at this stage, TfL proposes to commit to future monitoring and implementation of mitigation under existing powers where appropriate by assessing the traffic impacts closer to Scheme opening, and monitoring actual impacts thereafter to accurately identify the scale and location of adverse impacts to enable implementation of effective mitigation where required. This approach is explained in detail in the Monitoring Strategy (Document Reference 7.6) and the Traffic Impacts Mitigation Strategy (Document Reference 7.7). Both strategies will be DCO certified documents and will be subject to a DCO requirement. TfL does not propose to undertake microsimulation modelling of adjacent crossings as the strategic modelling of highway effects indicates only modest changes in traffic at these crossings. Further information on the microsimulation modelling that has been undertaken as part of the Scheme can be found in Appendix C of the Transport Assessment (Document Reference 6.5).	KS: Comments as per emerging LIR - so far most junction assumptions are taken from the distillation of the SATURN (strategic) model and therefore the outputs are questionable. The VISSIM model (TA App C) does not include the junctions along the A206 corridor which have been flagged by Borough Officers as 'of concern', and which show additional delays post implementation of the scheme in the TA. We believe additional detailed local modelling should have been undertaken as part of the submission to inform the LIRs. Going forward the HBs believe as part M&M, detailed local models of the named and 'know' junctions should be undertaken to help inform any mitigation which should be undertaken PRIOR to the scheme's implementation. 'Example assessments' are not considered adequate for a scheme of this magnitude.	Monitoring Strategy (Document Reference 7.6) Traffic Impacts Mitigation Strategy (Document Reference 7.7) Transport Assessment (Document Reference 6.5) - Appendix C	Monitoring Strategy (Doc Ref 7.6) and TIMS (Doc Ref 7.7) will be certified documents. Both are also the subject of a DCO requirement 7.		
	HB006	Confirmation required that CS2 and CS3 schemes have been taken into account in the A range of sensitivity tests should be considered in assessment documents (e.g.. untolled scenarios, incidents, additional crossings to the east, different values of time, different user groups inc local and long distance)	T Hamlets	Both schemes have been implemented in full in the modelling.				n/a	
	HB007	A range of sensitivity tests should be considered in assessment documents (e.g.. untolled scenarios, incidents, additional crossings to the east, different values of time, different user groups inc local and long distance)	Greenwich, Newham, T Hamlets	<u>TfL will report on a series of sensitivity tests in the DCO versions of previously published documents (Case for the Scheme, TA etc.) as well as in a new dedicated modelling report.</u> The DCO versions of the TA and Case for the Scheme document, with support from the Traffic Forecasting Report, are now supported by an additional sensitivity tests. These tests include but not limited to: - High Demand Scenario (population and employment growth exceeds GLA projections) - Low Demand Scenario (population and employment growth falls GLA projections) - Alternative crossings further east - to determine whether building crossings further east are a suitable alternative to the Silvertown Tunnel Scheme - Public Transport Alternatives - Alternative charging scenarios (1) - this includes a test with Both Blackwall and Silvertown Tunnels uncharged, as well as tests where on is charged but not the other. We have also tested charging Blackwall in the Reference Case (i.e. without Silvertown Tunnel). - Alternative CHarging Scenarios (2) - Assessed Case with charges increased and decreased by 20% to determine the sensitivity of the modelled impacts to the charge, and to acknowledge uncertainties regarding individuals' willingness-to-pay. We are also undertaking further tests in advance of the Examination including the following: - More tests of alternative crossings further east, this time with a particular focus on Gallions Reach	The reporting of the ST lacks clarity, there is no ease of comparison, and any discussion of the outputs is limited. New values of time outputs are still to be modelled. Uncommitted crossings (Gallions) although of interest, are not relevant to the submission. The tests have not helped the boroughs in their understanding of the tunnels/charging's performance. The ST in relation to growth and charge shows an inelasticity in the relationship, with use remaining high in the growth, high charge scenario.			n/a	

Charging	HB008	Residents discount is required (this was proposed as part of Thames Gateway Bridge)	Greenwich, Newham, T Hamlets	<p>In the Assessed Case, no resident discount is assumed. The Charging Statement (Document Reference 7.5) sets out the rationale for this. In summary these are:</p> <ul style="list-style-type: none"> - Undermines the Scheme objectives: residents of local boroughs form a substantial proportion of tunnel users and any specific discount would undermine the traffic demand management objectives of user charging, and the means to pay for the Scheme. This is in contrast to the Dartford Crossing or Congestion Charging scheme, for example, where residents form a relatively small proportion of users. - Alternatives to driving through the tunnel will continue to exist. Residents living in the Congestion Charging zone are eligible for a discount because if they need to move their car at all they have no choice but to drive in the zone. For the Blackwall and Silvertown tunnels this is not the case as there are free alternative highway crossings, as well as numerous alternative routes to cross the river using public transport (which will be enhanced by the Scheme). - No fair basis for deciding who qualifies for the discount: a local resident discount would have to distinguish between groups of people by whether or not they live within a specified area. There is no proper basis on which to determine the boundary of such an area and any such area could not take into 	<p>KS: DART TAG is shown as effective for the Dartford Crossing in supporting local use of the crossings; Blackwall is described as 'strategic', and Silvertown as 'local', and to some extent the (non agreed) Assessed Case model supports this. However the scheme as a whole is accepted as Nationally Significant with Silvertown providing resilience and capacity for the existing crossing, therefore local discount would still seem appropriate. Full O&D data is still under discussion and the TA and TF reports are being questioned at this point in time. This should be based on origins (am peak) and destinations (pm peak). Boroughs have experience of administration of more complex models.</p>	Charging Statement (Document Reference 7.5)	n/a	
	HB009	Commitment required to borough involvement in setting charges	Greenwich, Newham, T Hamlets	<p>As set out in the Charging Policy (Document Reference 7.11) and the Monitoring Strategy (Document Reference 7.6), a Silvertown Tunnel Implementation Group (STIG) will be established in advance of the Scheme opening to have oversight of setting the initial charge and making subsequent variations to the user charge. STIG would contain representatives from local boroughs including RB Greenwich, LB Newham and LB Tower Hamlets.</p>	<p>yes - with discussed qualifications on draft DCO schedule for STIG re membership and decision making</p>	Charging Policy (Document Reference 7.11) Monitoring Strategy (Document Reference 7.6)	The terms of reference for STIG are set out at Article 65 of the draft DCO. Article 65 allows for all of the host boroughs (as well as others) to be part of STIG and therefore be involved in setting and varying the charge.	
	HB010	Charge rates should be set now	Greenwich	<p>In order for the user charge to be most effective, it must be calibrated in response to prevailing conditions, therefore it would be inappropriate to fix the charge in 2016, some six years ahead of Scheme opening. The Charging Policy (Document Reference 7.11) sets out the process and considerations which will govern the setting of the charge for the opening year and in subsequent years, including that data on traffic and the environment from the Monitoring Strategy (Document Reference 7.6) will be used to inform the decision-making with regard to the charges for the opening year.</p> <p>The Silvertown Tunnel Implementation Group (STIG) will convene during this pre-implementation period to consider what the charges for the opening year should be. It will then make recommendations for the user charge. The decision to confirm these charges will lie with the TfL Board. This procedure is set out in the Charging Policy (Document Reference 7.11).</p>	<p>Agree this should be set closer to the time of opening</p>	Charging Policy (Document Reference 7.11) Monitoring Strategy (Document Reference 7.6)	Article 52 of the draft DCO sets out the provisions for charging the Blackwall and Silvertown Tunnels. This requires that the charges are set and varied in accordance with the Charging Policy, which is certified document. The Charging Policy sets out the factors that TfL must have regard to in setting and varying the charge. TfL must set an initial charge to ensure the Scheme in operation is not likely to give rise to significant	
	HB011	East London residents / businesses are particularly price sensitive and this needs to be considered in modelling	Newham, T Hamlets	See answer to HB002		See answer to HB002	n/a	
	HB012	Assurance needed that users' willingness to pay over time has been fully taken into account	T Hamlets	See answer to HB002		See answer to HB002	n/a	
	HB013	Tolling surplus should be spent on transport projects in east London	Newham	<p>Revenue from the user charge will in the first instance be used to pay for the costs of construction of the Silvertown Tunnel and for its ongoing maintenance and operation. As charging is anticipated to be a long term measure which is required to manage traffic demand at the tunnels for the foreseeable future, the revenue from user charging may also play a part in funding other future transport investments in London once the Scheme costs have been met.</p> <p>See answer to HB002 plus:</p>	<p>Revenue should be committed in the medium term for the construction cost with an agreed 'set aside' for STIG agreed mitigation</p>	Charging Statement (Document Reference 7.5)	n/a	
	HB014	Risk of displacement to other crossings (esp. HGVs to Woolwich) and impacts on town centres / residential areas	Greenwich, Newham	<p>The level of 'displacement' of traffic to other crossings as a result of the charge (and equally, the level of 'attraction' from other crossings as a result of improved conditions at the Blackwall Tunnel) is in essence a function of the elasticity of demand with respect to the level of the user charge and to time. These relationships are balanced within the model through the use of 'values of time'. TfL has set out in detail what it considers are the most likely effects of the scheme on adjacent crossings, and concludes that impacts are likely to be modest and manageable, with similarly modest effects on town centres and residential areas also. TfL is producing a Technical Note which builds on Appendix E of the Transport Assessment and provides further information on the expected impacts of the scheme on other crossings.</p> <p>Sensitivity testing described above provides the key means of assessing potential impacts of values of time are higher or lower than assessed, and also provides reassurance that alterations to the charge could be used to address any unforeseen impacts. Monitoring Strategy & TMS designed to identify if Scheme has unexpected impacts in this regard and provide the mechanism for mitigating/managing this. There are a range of localised mitigation measures that could potentially be implemented if required such as changes to signals or junction layouts, or implementation of additional charging areas for instance at</p>	<p>Still remains a concern as per the emerging LIR comments. As above the assessed case outputs are not yet agreed</p>			
	HB015	Assessment of charging at Rotherhithe and charging Blackwall/Silvertown in advance of scheme opening should be undertaken	Greenwich	<p>See answer to HB014 plus: Modelling does not suggest a need to charge at adjacent crossings (RT, WF) - this is detailed in Appendix E of TA. Charging at Blackwall alone does not achieve Scheme objectives of increased resilience and reduced congestion.</p>	<p>Assessed case not agreed</p>			
	HB016	Need to be clear how charging would be implemented at adjacent crossings if monitoring indicated it was required	Greenwich	<p>See answer to HB014 plus: There are a number of ways in which excessive and unexpected displacement could potentially be dealt with, including by adjusting charges at Blackwall/Silvertown or other localised measures, and these are to be the main focus of the Charging Policy (Document Reference 7.11) and the Traffic Impacts Mitigation Strategy (TMS) (Document Reference 7.7). While these documents do not set out explicitly how charging at adjacent crossings could be implemented, they are not precluding this as an option.</p> <p>The Mayor/TfL already have power to implement road user charging (RUC) schemes under Schedule 23 of the GLA Act (used for Congestion Charging, LEZ, ULEZ). There is a statutory consultation process set out, and, were additional RUC to be proposed, this would be followed. Imposition of charges at Woolwich Ferry would require changes in primary legislation but, again this is not precluded by the In developing the user charges in the Assessed Case TfL has considered the current patterns of demand for the Blackwall Tunnel, and the forecast demand for it and the Silvertown Tunnel in the future. The duration of peaks in demand vary by direction of travel and it is therefore appropriate to set differential rates for different periods of time. The Charging Statement (Document Reference 7.5) explains this in more detail.</p> <p>It also sets out that the Assessed Case user charges are indicative of the charges that are likely to apply when the Scheme opens and may be varied in future. This ability to vary applies to all aspects of the user charges including the charging hours. Should future modelling or monitoring of the Scheme TfL has now committed to use of the river for transporting at least 50% of all construction material by weight. This has resulted in a considerable reduction in the number of lorry movements, and a more equitable split in the number of movements by worksite. This commitment and the resultant impact on lorry movements is now reflected in the Transport Assessment.</p>	<p>Still unresolved re Woolwich Ferry where primary legislation is required. Variation of Silvertown toll to encourage movement from the Ferry has the additional disadvantage of encouraging more use and the associated AQ/congestion concerns</p>	Charging Policy (Document Reference 7.11) Traffic Impacts Mitigation Strategy (Document Reference 7.7)	n/a	
	HB017	Different directional peak hours - duration of peak charge should be same for AM and PM	Newham	<p>See answer to HB014 plus: There are a number of ways in which excessive and unexpected displacement could potentially be dealt with, including by adjusting charges at Blackwall/Silvertown or other localised measures, and these are to be the main focus of the Charging Policy (Document Reference 7.11) and the Traffic Impacts Mitigation Strategy (TMS) (Document Reference 7.7). While these documents do not set out explicitly how charging at adjacent crossings could be implemented, they are not precluding this as an option.</p> <p>The Mayor/TfL already have power to implement road user charging (RUC) schemes under Schedule 23 of the GLA Act (used for Congestion Charging, LEZ, ULEZ). There is a statutory consultation process set out, and, were additional RUC to be proposed, this would be followed. Imposition of charges at Woolwich Ferry would require changes in primary legislation but, again this is not precluded by the In developing the user charges in the Assessed Case TfL has considered the current patterns of demand for the Blackwall Tunnel, and the forecast demand for it and the Silvertown Tunnel in the future. The duration of peaks in demand vary by direction of travel and it is therefore appropriate to set differential rates for different periods of time. The Charging Statement (Document Reference 7.5) explains this in more detail.</p> <p>It also sets out that the Assessed Case user charges are indicative of the charges that are likely to apply when the Scheme opens and may be varied in future. This ability to vary applies to all aspects of the user charges including the charging hours. Should future modelling or monitoring of the Scheme TfL has now committed to use of the river for transporting at least 50% of all construction material by weight. This has resulted in a considerable reduction in the number of lorry movements, and a more equitable split in the number of movements by worksite. This commitment and the resultant impact on lorry movements is now reflected in the Transport Assessment.</p>	<p>Acknowledge the need to suppress peak demand, however this disproportionately impacts Greenwich residents who will be subject to the higher charge in both directions. A local discount would mitigate against this. at peak times</p>	Charging Statement (Document Reference 7.5)	n/a	
Construction impacts	HB018	Construction impact of lorry movements (up to 310,000) significant - noise, vibration, dust etc. - and numbers must be reduced or spread more equitably between work sites	Newham	<p>See answer to HB014 plus: There are a number of ways in which excessive and unexpected displacement could potentially be dealt with, including by adjusting charges at Blackwall/Silvertown or other localised measures, and these are to be the main focus of the Charging Policy (Document Reference 7.11) and the Traffic Impacts Mitigation Strategy (TMS) (Document Reference 7.7). While these documents do not set out explicitly how charging at adjacent crossings could be implemented, they are not precluding this as an option.</p> <p>The Mayor/TfL already have power to implement road user charging (RUC) schemes under Schedule 23 of the GLA Act (used for Congestion Charging, LEZ, ULEZ). There is a statutory consultation process set out, and, were additional RUC to be proposed, this would be followed. Imposition of charges at Woolwich Ferry would require changes in primary legislation but, again this is not precluded by the In developing the user charges in the Assessed Case TfL has considered the current patterns of demand for the Blackwall Tunnel, and the forecast demand for it and the Silvertown Tunnel in the future. The duration of peaks in demand vary by direction of travel and it is therefore appropriate to set differential rates for different periods of time. The Charging Statement (Document Reference 7.5) explains this in more detail.</p> <p>It also sets out that the Assessed Case user charges are indicative of the charges that are likely to apply when the Scheme opens and may be varied in future. This ability to vary applies to all aspects of the user charges including the charging hours. Should future modelling or monitoring of the Scheme TfL has now committed to use of the river for transporting at least 50% of all construction material by weight. This has resulted in a considerable reduction in the number of lorry movements, and a more equitable split in the number of movements by worksite. This commitment and the resultant impact on lorry movements is now reflected in the Transport Assessment.</p>	<p>KS: RBG concern that this is still shown as total movement and does not give a commitment sites to north and south of the river. TA required for each of the compounds and the quantum of movement by mode should be a contractual requirement</p>			

	HB019	Commitment to use of the river required	Greenwich, Newham	Section 3.2 of the Code of Construction Practice (Doc Ref. 6.10) sets out TfL's approach to river transport during construction. Subject to derogations, the CoCP requires that at least 50% by weight of all materials associated with the Scheme by river and 100% of suitable excavated material out by river. The contractor must prepare a Construction Site River Strategy (CSRS) and cannot start work until it is approved by TfL in consultation with the relevant planning authority. The commitment to maximise the use of the river will be enshrined in the construction contract.	As in TTT contracts should incentivise use of river above the levels required in the contracts. CoCP is still to be refined and agreed.		Code of Construction Practice (Doc Ref 6.10) Transport Assessment (Doc Ref 6.5)	The CoCP is a certified document in the draft DCO and therefore, is binding. Compliance with the CoCP is also secured through requirement 5 in Schedule 2 of the draft DCO. The CSRS is secured specifically through requirement 5(2)(f).	
	HB020	Disappointed no plans to remove spoil from the Greenwich work site by river	Greenwich	TfL has assessed the potential for transporting some construction material to and potentially from the Greenwich worksite by river by making use of a suitable wharf facility near to the site. This is now reflected in the Transport Assessment.	Use of Brewery Wharf is not considered appropriate - the additional lorry movements off the TLRN through residential/WHS areas to access this site would be detrimental			The CoCP is a certified document in the draft DCO and therefore, is binding. Compliance with the CoCP is also secured through requirement 5 in Schedule 2 of the draft DCO. The CSRS is secured specifically through requirement 5(2)(f).	
	HB021	Travel plan for construction workers required. This should include consideration of shuttle bus to/from Canning Town / river transport for construction workers	Greenwich, Newham	Section 3.1 of the Code of Construction Practice (Doc Ref 6.10) sets out the approach and information requirements for Construction Traffic Management Plans to be prepared for each worksite when the contractor is appointed. These must include a Construction Workers Travel Plan, developed to encourage the use of sustainable modes of transport to and from site by those working on the project.	KS: These areas need to be strengthened and not left solely to the contractor - TTT sites as e.g. of bad practice - TfL needs to ensure the basics of TP/FORS/CTMP form part of the contracts		Code of Construction Practice (Doc Ref 6.10)	The CTMP and therefore the CWTP is required by the CoCP, which is a certified document. Compliance with the CoCP is also secured through requirement 5 in Schedule 2 of the draft DCO. The CTMP is specifically secured through requirement 5(2)(g) and must be approved by the local planning authority in consultation with the local highway authority prior to commencement of the relevant part of the development	
	HB022	Proposed car parking for construction workers is unacceptable	Newham	The proposed car parking numbers at each of the worksites has been reviewed and updated to take into account borough comments. The Silvertown site now has 100 spaces (was 200) and the Greenwich site now has 50 spaces (was 80). This is reflected in the Transport Assessment.	50 is still considered high for RBG - should be reserved for trades which require the carriage of equipment only not for general 'commute'. LBTH consider 100 is also too high - Operational spaces for essential visitors only.		Transport Assessment (Doc Ref 6.5)		
	HB023	Assurance needed that targets in Site Waste Management Plan will be met - how will the contractor be incentivised to meet these targets?	T Hamlets	Chapter 13 of the Code of Construction Practice (Doc Ref 6.10) submitted with the application sets out the approach to waste and materials management, including that a Construction Materials Management Plan (CMMMP) will be prepared by the Contractor and approved by the local authorities. The CoCP also includes CD&E Materials Commitments (appendix C), a Receptor Site Assessment (appendix D) and a Site Waste Management Plan. Together these provide evidence and explanation about how TfL will meet the various materials and waste commitments and targets.	ok		Code of Construction Practice (Doc Ref 6.10)	The CoCP is a certified document in the draft DCO and therefore, is binding. Compliance with the CoCP is also secured through requirement 5 in Schedule 2 of the draft DCO. The CMMMP is secured specifically through requirement 5(2)(e) and must be approved by the local planning authority prior to commencement of the relevant part of the	
	HB024	Working hours should be 0800 to 1800 Monday to Friday and 0800 to 1300 on Saturday (rather than 0700 to 1900 as current)	T Hamlets	Proposed working hours are set out in section 2.3 of the Code of Construction Practice (Doc Ref 6.10) and will be 0800-1800 Monday to Friday and 0800-1400 Saturday (with one hour set up and close down) for non-tunnel construction works.	ok		Code of Construction Practice (Doc Ref 6.10)	The working hours are set out in the CoCP, which is a certified document and secured through requirement 5 of the draft DCO.	
	HB025	Confirmation required that borough refuse / waste vehicles will not be restricted from using the Blackwall Tunnel	T Hamlets	Confirmed It is not proposed to restrict use of BWT during construction.	Still requires clarification on exemption (Schedule of DCO??)			n/a	
Traffic impacts on local areas	HB026	Operation: potential diversion of traffic through Royal Docks and Canning Town, particularly when there are incidents on the network. Particular concern about Gallions Roundabout, where capacity is limited and the potential for traffic re-routing from the A13 and A406 to the Silvertown Tunnel through this junction is significant.	Newham	The strategic modelling indicates that in normal conditions, there is no significant amount of traffic travelling through the Royals as a result of Silvertown - increases in flow on roads within the Royal Docks area to a significant extent reflect the large increase in bus provision assumed in the Assessed Case and otherwise generally reflect the benefit of the new crossing in enhancing connectivity to this area for traffic with an origin or destination there. This reflects the fact that access to areas beyond the Royal Docks is likely to be quicker via the Blackwall Tunnel and A13. There are no indications of issues at the Tidal Basin roundabout but this sensitive junction has nevertheless been added to the list of locations for monitoring to ensure that any unforeseen impacts could be rapidly identified and addressed. In unusual conditions such as when heavy congestion or incidents occur on the A13, TfL acknowledges there is some potential for traffic to divert through the Royal Docks to avoid problematic conditions on the strategic network, TfL would take steps (to be defined) to mitigate the likelihood of unsuitable traffic volumes diverting through the Royals. With regard to incident-related congestion on the A13, it should be noted that on each occasion the cause is not necessarily a problem on the A13 itself. In fact, we expect that a significant % of A13 problems of this nature are caused by an incident at the Blackwall Tunnel - on these occasions we expect that the introduction of the Silvertown Tunnel will reduce the impact of such an incident and hence, result in fewer delays on the A13 and surrounding roads if the Silvertown tunnel is implemented. The audit of the base year model and reference case is now complete, and SDG have reissued their base year model report, and meetings have been held with Host Boroughs on the same, agreeing that, subject to resolution of a few remaining caveats discussed in the sessions held with RBG/LBTH on 25th Feb and LBN on 2nd March, the model is fit for purpose as a forecasting tool. Boroughs have	Still live - 'steps' need to be defined!!! The assessed case model is NOT agreed as fit for purpose - see above.			n/a	
	HB027	Improvements to local junctions predominantly on A206 required	Greenwich	The outputs from TfL's modelling programme do not suggest there is a need for junction mitigations at these locations. Nevertheless Trafalgar Road has been included in the Monitoring Strategy (Document Reference 7.6) to provide RB Greenwich with re-assurance that mitigation will be implemented should a need for this be identified as a result of the Scheme.	This is not agreed - see 005		Monitoring Strategy (Document Reference 7.6)	Monitoring Strategy (Doc Ref 7.6) and TMS (Doc Ref 7.7) will be certified documents. Both are also the subject of a DCO requirement 7.	
	HB049	Commitment needed that new buses will be of highest env standard	Greenwich	From September 2020, all buses in central London must meet new emissions standards (Euro VI) owing to the introduction of the Ultra Low Emission Zone (ULEZ). TfL continues to implement a policy of reducing its fleet emissions. There are 1,500 hybrid buses, 22 electric buses, and 8 hydrogen buses currently operating in London, out of a total bus fleet of 8,600. TfL have committed that any buses using the Silvertown Tunnel will be equipped with engines that are of Euro VI (or equivalent) emissions class to minimise any impact that the buses would have on air quality. It must be noted that the impact of this has not been factored into the air quality assessment and therefore it has been assumed in the assessment that some Buses will be of a lower Euro Standard. As such, the assessment is likely to have resulted in higher predicted concentrations in the Assessed Case, than if assumed to be Euro VI in the areas where the new bus routes are proposed. See HB059 plus			Environmental Statement (Document Reference 6.3) - Chapter 6		
	HB028	Mitigation required to address rat running, HGVs rerouting on local roads and increased traffic congestion on Cable Street	T Hamlets	No evidence of significant rat-running from the strategic model. With regard to the audit of the model. see HB001. See HB059 plus	see 005 etc				
	HB029	Have potential new rat runs been identified? Confirmation needed that TfL will fund traffic management mitigation on borough roads.	T Hamlets	No evidence of significant rat-running from the strategic model. With regard to the audit of the model. see HB001.	as above				

		HB030	Further consideration needed of HGV routing / volumes if northbound height restriction is removed	Newham, T Hamlets	HGV demand effects are addressed through the strategic modelling. To ensure maximum flexibility of the scheme and network efficiency through allowing traffic to travel via its preferred route, it is not proposed at this stage to impose restrictions on the type of vehicle which are able to use either tunnel (with the exception of the existing height restrictions on the Blackwall Tunnel). However, these options will be considered in further detail. A TIL operational working group has been established to (amongst other things) develop the operational strategy to ensure that all over-height vehicles are appropriately directed towards the Silvertown Tunnel bore on the A102 northbound approach, as well as planning the necessary signage and vehicle monitoring / detection systems. TIL will produce a HGV management strategy allowing detailed consideration of HGV volumes and anticipated routing in the context of the removal of the restriction on taller HGVs travelling northbound and local land use changes. <u>Letter to Host Boroughs</u>	The lack of sophistication of the model does not show potential additional demand of current 'over heights' or non permitted (by dangerous load) and displacement of owner drivers to non charged options on vot.				
		HB063	TfL should be clear about plans for highway designation / re-classification of borough roads to TLRN	Newham	Agreed - must formally consult (28 day) host boroughs as necessary. Letter sent to Host Boroughs regarding this issue, and discussed at several Host Borough meetings (including 31/03/16)	resolved				
		HB031	Further assessment of Newham tie-in and Gallions roundabout required	Newham	Tie in with Gallions Roundabout has been tested within VISSIM.	closed				
Environment		HB033	Inability to rely on environmental modelling due to reliance on unvalidated traffic model data	Greenwich, Newham, T Hamlets	See HB001					
		HB032	Imperative that impacts on adjacent crossings more fully assessed (including detailed modelling)	Greenwich, Newham	See HB002, HB014, HB015, HB016					
		HB034	Air quality and noise assessment has not adequately addressed issues previously raised and appropriate mitigation has not been identified (including at Silvertown Way, Lower Lea Crossing and North Woolwich Road)	Newham	<u>Reviewed - Additional assessment and development of monitoring strategy</u> Volume 1, Chapter 6 -Air Quality of the ES considers whether the impacts of the Scheme are likely to lead to a significant impact on air quality, in accordance with DMRB. It will also demonstrate compliance with the National Networks National Policy Statement (NNNPS). This will determine whether mitigation will be required to reduce the Scheme impacts. Environmental monitoring approach developed with Host Borough input. (including discussion at the 17/03 Host Borough meeting)	Still issue on application of guidance - LNB to take away				
		HB035	Whole borough is an AQMA and even minor increases in air pollution are unacceptable	T Hamlets	<u>Presence of the AQMA is acknowledged</u> The location of all the modelled receptors have been presented in Volume 1, Chapter 6 of the ES, the air quality assessment and have been undertaken in accordance with DMRB and associated interim advice notes. Significance of impacts have been determined in accordance with IAN 174/13. Increases in concentrations at receptors are included in the judgement as to whether the Scheme has a significant impact on air quality. Should the impact of the Scheme be deemed significant mitigation options would then be investigated					
		HB036	Further consideration to green walls and bridges across the A102 needed	Greenwich	Since the statutory consultation, TfL has identified additional opportunities to provide landscaping around the portals and associated buildings on both the north and south of the river. This will provide additional visual screening as well as benefits to ecology. TfL has also included design principle SUEN.03 to ensure opportunities for the inclusion of green infrastructure design including biodiversity roofs and living walls are included at detailed design stage. These will provide further habitat for wildlife. For more information regarding landscaping please see sections 5 and 6 of the Design and Access Statement (Document Reference 7.3). Details of the Boord St footbridge are also outlined within in section 7.4 of this document	ok		Design and Access Statement (Doc Ref 7.3)		
		HB037	Impact of ULEZ needs to be included in air quality assessment	Greenwich	The Air Quality assessment is undertaken against the published advice for undertaking assessments of impacts of road schemes namely DMRB. The criteria in DMRB is used to define the extent of the study area, it must be noted that some areas have been included in the air quality assessment that did not meet the DMRB criteria, this was to ensure that there were no gaps or isolated areas that were included in the air quality modelling. It is understood that Defra are to release an updated Emission Factor Toolkit (EFT) which takes into consideration the fleet composition of vehicles as a result of ULEZ being operational. It is anticipated that as ULEZ will reduce future baseline concentrations both with and without the Scheme, it won't have a significant impact on the assessment results. The change in concentrations as a result of the Scheme is likely to be similar to that provided in the ES, once the EFT has been issued we will provide a note which will detail the impact of the revision to the emission factors	Is EFT now live?		Environmental Statement (Document Reference 6.3)		
		HB038	Commitment to air quality monitoring required from now until 5 years post opening	Greenwich	<u>Monitoring Strategy</u> A monitoring strategy outlining the approach to monitoring post scheme implementation has been developed with Host Borough input. This outlines the type of monitoring, duration and indicative location of the sites. This will be completed once the air quality modelling has been finalised to ensure that the monitoring is appropriate. Air Quality monitoring is proposed from 3 years prior Scheme opening to 3 post opening, with an option to extend to 5 years	ok with usual caveat on model of AC		Monitoring Strategy (Doc Ref 7.6)	Monitoring Strategy (Doc Ref 7.6) and TMS (Doc Ref 7.7) will be certified documents. Both are also the subject of a DCO requirement 7.	
		HB039	Sceptical that change in PM10 levels is not fully considered (given that it is a non-threshold pollutant)	Newham	The air quality assessment has been undertaken in accordance with Design Manual for Roads and Bridges (DMRB), the significance of the Scheme's impacts is based on the advice in Interim Advice Note 174/13. Therefore the changes in PM10 are considered in the air quality assessment. The maximum concentration in either of the reference case or assessed case scenarios for PM10 is 25.6 µg/m3, this is well below the annual mean Air Quality Standard (AQS) objective of 40 µg/m3. The largest, and only perceptible increase in PM10 is 0.6 µg/m3 at Tidal Basin Rd. Seven of the total modelled receptors are predicted to have a perceptible decrease (> -0.4 µg/m3). Given the very small magnitude of change in the assessed case, any exceedance of the 24 hour Air Quality Standard (AQS) objective for PM10 can be ruled out. Please refer Section 6.6 of the Environmental Statement (Document 6.1) for the full results. In addition, a Health and Equalities Assessment (Document: 6.8) has been undertaken alongside the ES and as such the changes in air quality as a result of the Scheme and the likely effects on health are considered in conjunction with the impacts of the Scheme	ok?		Environmental Statement (Doc Ref 6.1) - chapter 6 Health and Equalities Impact Assessment (Doc Ref 6.8)		
		HB040	Noise reduction mitigation on Siebert Road, if feasible, should be delivered in advance of scheme opening	Greenwich	TfL is providing measures to reduce traffic noise at Siebert Road and Westcombe Hill adjacent to the existing A102 as a complimentary measure to the Silvertown Tunnel project. The noise assessment within Chapter 14 of the Environmental Statement (Document Reference 6.1) demonstrates a negligible decrease in noise of between -0.1 to -3.0 dB LA10 for the area around the A102 immediately to the north of Siebert Road and Westcombe Hill as a result of the Silvertown Scheme. A similar outcome can therefore reasonably be expected to apply for the Siebert Road and Westcombe Hill area once the tunnel is operational and therefore, mitigation is not required as a direct result of the Scheme. Notwithstanding this fact, TfL is working with the Royal Borough of Greenwich to develop measures to attenuate the existing traffic noise impacts arising from the A102. TfL installed low noise surfacing on the A102 in the vicinity of Siebert Road and Westcombe Hill, which will help reduce traffic noise levels. A study has also recently been completed which reviews existing noise levels and the feasibility of implementing further noise mitigation measures in the form of an Environmental Barrier. The study concludes that, in most locations, a 3m high barrier could attenuate the noise from the A102 so that the noise levels at the façade of the properties on Siebert Road and Westcombe Hill would not exceed 68 dB LA10. Subject to TfL obtaining a DCO authorising the Silvertown Tunnel, TfL has committed to contributing towards the installation of an environmental barrier to provide noise attenuation to the properties on	RBG would require a commitment to the implementation of the noise barrier immediately on approval and ahead of scheme's implementation		Proposals outside of DCO application - complimentary measure		

		HB041	PEIR does not meet national planning guidance with regard to noise impact. A number of detailed comments explaining why this is considered to be the	Newham	<u>Reviewed: update</u> TFL has met with Newham (EHOs) to discuss the detail of this comment and some updates to the chapter of the ES have been made.	MW to check		Environmental Statement (Doc Ref 6.1) - chapter 14		
Impact on development		HB043	Junction layout on the north side also impacts on future development plots and discussions should continue with LBN and GLA officers to ensure that the layout of roads and ancillary buildings and infrastructure allow for viable development plots to remain next	Newham	<u>Reviewed: Change</u> Ongoing discussions between GLA and LBN (and other land owners) has resulted in changes to the layout of elements of the scheme, including the portal buildings. These changes have been agreed with the GLA.	ok				
		HB042	Potential adverse noise and air quality impacts in the vicinity of the tunnel portal (on Silvertown Way, Lower Lea Crossing and North Woolwich Road) where significant residential development is proposed	Newham	<u>Reviewed: assessments updated</u> Volume 1, Chapter 6 - Air Quality and Chapter 14- Noise of the ES will consider whether the impacts of the Scheme are likely to lead to a significant impact on air quality and noise, in accordance with DMRB. It will also need to demonstrate compliance with the National Networks National Policy Statement (NPPS). This will determine whether mitigation will be required to reduce the Scheme impacts. Noise impact monitoring discussed at Host Borough meeting 17/03/16. The Monitoring Strategy and TIMS has been developed in consultation with the host boroughs and includes noise monitoring post-opening of the tunnel	MW to check				
Buses / public transport		HB045	Definitive commitment to bus provision needed in the DCO submission	Greenwich, Newham, T Hamlets	As part of the package of improvements, Silvertown tunnel would facilitate the implementation of an additional 37.5 buses per hour in each direction across the river at this location. The potential new routes and route extensions so far shown for the Scheme are indicative only and will be confirmed closer to the Scheme opening, and the Silvertown Tunnel Implementation Group (STIG) (which comprises representatives from local boroughs) will have a role in making recommendations for the cross-river bus network. Changes to bus services will also be subject to public consultation. There are some six years between the DCO application and the Scheme opening. Therefore TFL does not consider it appropriate to commit to routes at this time, especially given the rate of growth and change in the east and south east sub region of London. TFL is producing a Bus Strategy for the Silvertown Tunnel which sets out why and how bus services are an essential component of the Silvertown Tunnel scheme and explains why TFL would run new and/or extended services via the Tunnel. It also describes the process of bus network planning and development for London as a whole and how the development of cross-river routes at the Blackwall and Silvertown tunnels will fit into this. It also describes the role that STIG will have in this.	Again a requirement that a minimum number of routes (equal to or greater than the capacity assumed in the Assessed Case) must be committed by TFL pre opening of the scheme		Transport Assessment (Document Reference 6.5) - Appendix F Draft Development Consent Order (Document Reference 3.1)		
		HB046	Bus mileage is fixed and new routes only possible at expenses of others	Newham	TFL constrally reviews the bus network across London. New routes are added within existing network as and when proven by business case, and to serve/utilise new infrastructure as it comes on line. Bus mileage is not fixed and it is therefore possible for new routes to be implemented without offsetting	out of date				
Economic impacts		HB044	More detailed analysis of local employment and growth benefits would be welcomed	Greenwich	<u>Regeneration and Development Impacts Report</u> Socio-economic element of the scheme was discussed at Host Borough meeting of the 18/02/16. Regeneration and Development impacts report will have a section summarising the impacts of the Scheme at a Borough level, including changes in access to existing jobs, and potential new jobs created - generated by recent run of the LonLUTI model.	Now included in TA and statement of case				
		HB048	Buses may not reduce demand for Blackwall Tunnel to extent expected	Newham, T Hamlets	The ability to run more, and more reliable, bus services is an important benefit of the Scheme. TFL's assessment is that, regardless of whether the Scheme is in place, public transport mode share in the east and south east sub-region will rise from its current level of around 56 per cent to around 60 per cent in 2021 (over a 24 hour period). With the Scheme, the number of trips by private vehicle in 2021 actually decreases compared to a scenario without the Silvertown Tunnel, including cross-river trips made by vehicle. However, the primary purpose of the bus services is to facilitate additional trips and provide alternatives for those who do not wish to pay the charge to cross at the Blackwall and Silvertown tunnels rather than to trigger mode shift per se - TFL's assessment is that the user charge is likely to	PT welcomed but it does not have any effect as a modal shift tool from private vehicle use		Transport Assessment (Document Reference 6.5)		
		HB047	None of the proposed bus routes serve Tower Hamlets	T Hamlets	As part of the package of improvements, Silvertown tunnel will allow the implementation of an additional 37.5 buses per hour, each direction across the river at this location. In line with normal TFL bus planning procedures, the detailed bus route planning process would begin around two years before the opening of the Silvertown Tunnel. The consultation materials published for the statutory consultation showed potential improvements to bus services including changes to existing routes and potential new routes. Three of these - the 309, the 108 and a potential new routes serving Canary Wharf to Grove Park pass through Tower Hamlets. The potential new routes and route extensions so far shown for the Scheme are indicative only and will be confirmed closer to the Scheme opening, and the Silvertown Tunnel Implementation Group (which comprises representatives from local boroughs) will have a role in making recommendations for the cross-river bus network. Changes to bus services will also be subject to public consultation. TFL is additionally producing a Bus Strategy for the Silvertown Tunnel which sets out why and how bus services are an essential component of the Silvertown Tunnel scheme and explains why TFL would run new and/or extended services via the Tunnel. It and describes the process of bus network planning and development for London as a whole and how the development of cross-river routes at the Blackwall and			Transport Assessment (Document Reference 6.5) - Appendix F Draft Development Consent Order (Document Reference 3.1)		
		HB050	Opportunity to extend the DLR should be included in proposals	Greenwich	TFL did assess the feasibility of extending the DLR network via the Silvertown Tunnel to serve the Kidbrooke, Eltham and Falconwood areas of south Greenwich. This would involve running new services to and from Stratford International, on the basis that spare capacity is available on this branch but not for additional services to Bank/Tower Gateway. While such an extension could in principle go some way towards improving public transport connectivity in the area around the Silvertown Tunnel, several major engineering challenges exist which mean that TFL does not consider it to be a viable option as part of this Scheme. These are set out in the Case for the Scheme (Document Reference 7.1)	still a desire for n/s links		Case for the Scheme (Document Reference 7.1)		
		HB051	Need to progress work on a waterfront bus transit route	Greenwich	A waterfront bus transit route is being considered as part of the river crossing proposals east of Silvertown, namely at Gallions Reach and Belvedere. However such a route would not fulfil the objectives of this scheme, which are to provide resilience to Blackwall Tunnel and reduce congestion on the road network. TFL has identified new and extended cross-river bus routes which could be enabled by the Scheme, and the benefits of the Scheme in terms of reduced congestion and greater journey time reliability would be experience by bus users in the local area more generally.	still desire for connectivity A.Wd to N Greenwich - currently being progressed as part of Crossrail complementary routes		Case for the Scheme (Document Reference 7.1)		
Pedestrians and cyclists		HB052	The new tunnel portal and enlarged roundabout with increased traffic will have a detrimental impact on pedestrian and cycle permeability and connectivity (more work to refine)	Newham	<u>Design update</u> All changes described have been made to reference design	some progress, final design still not resolved				
		HB053	Improvement of Lower Lea Crossing cycle track required	Newham	<u>Reviewed: update</u> In response to concerns raised by LB Newham during consultation regarding existing pedestrian and cycle provision on the Lower Lea Crossing, TFL will explore such improvements as part of a Development Infrastructure Funding (DIF) Study for the Royal Docks OAPF. This will consider options including environmental improvements, increasing the width of the cycle way and adjusting levels of segregation. The Silvertown Tunnel Project will also consider providing a financial contribution to the implementation of an appropriate scheme. However, this is not necessary to mitigate the impacts of the DCO and therefore is not part of the scheme.	welcome offer of financial contribution to cycle routes				
		HB054	Greater ped and cycle connectivity required at Tidal Basin roundabout	Newham	<u>Reviewed: update</u> Improvements to Tidal Basin Roundabout are included in the scheme design and explained in the DAS submitted with the DCO application.	resolved				
		HB055	Alternative to Boord Street footbridge required whilst it is without ramps	Greenwich	<u>Confirmed</u> Commitment to provide ramp access at Boord Street footbridge by means of either existing, new or temporary facilities.	resolved				

		HB056	EAL pricing reductions - either standard Oyster fares or free for local residents	Greenwich, Newham, T Hamlets	TfL has proposed to produce a future EAL fares strategy document in consultation with local Boroughs, which would be published ahead of the opening of the Silvertown Tunnel. The objective of this strategy will be to set out fare options for the EAL. There are a number of possible options including discounts on existing fares or annual passes for regular users. This will be supported by further analysis of the needs of EAL users and potential EAL users, with a view to bringing forward additional measures where appropriate to ensure the EAL is fulfilling its role as a local crossing. As the setting of fares for the Emirates Air Line is a Mayoral decision, the final decision will be made by the future Mayor. However, the EAL fares strategy will be used to inform that decision.	ongoing following MoL's request - TfL position statement awaited				
		HB057	Improved cross-river cycling connections required - through the tunnel (via a specially adapted vehicle?) and between Peninsula and Isle of Dogs, possibly in the form of a river-based 'shuttle'	Greenwich, T Hamlets	The provision of cross-river pedestrian and cyclist trips is not an objective of the Silvertown Tunnel Scheme. It also does not give rise to an adverse impact on peds and cyclists wanting to cross the river. Therefore, there is no need to provide mitigation, though TfL has explored whether there are any synergies in the delivery of the Scheme. Provision within the tunnel for peds/cyclists will not be part of the design/application, for the reasons of safety, cost, and effectiveness against Scheme objectives as detailed in the Consultation documents.	still required				
Other		HB058	Growth data for Newham out of date and no mention of the Enterprise Zone. Further consideration needed on how the traffic impacts of scheme impact on the EZ.	Newham	TfL acknowledges that the growth assumptions set out in the consultation version Transport Assessment was out of date (the data used in the modelling was in fact up to date). TfL has updated the relevant data on growth assumptions in the final Transport Assessment and information has been included on expected growth in the Royal Docks EZ, Greenwich Peninsula and Charlton Riverside.	resolved				
		HB059	Monitoring and mitigation strategy needs to be agreed in advance and cover a period of more than 5 years	Greenwich, Newham, T Hamlets	Since the statutory consultation significant further work has been completed on TfL's proposed approach to monitoring and mitigating the potential impacts of the Scheme, in consultation with the host boroughs. This has resulted in the development of the following three documents, which set out TfL's approach in detail: <ul style="list-style-type: none"> • Monitoring Strategy (Document Reference 7.6) – this sets out the scope of monitoring that TfL proposes to undertake in respect of traffic, air quality and carbon, noise and socio-economic impacts of the operation of the Scheme. The monitoring programme will commence 3 years prior to Scheme opening and last for 3-5 years post scheme opening. Furthermore, TfL collects a wealth of traffic data on an ongoing basis as part of its day to day responsibilities and Network Management Duty (under the Traffic Management Act 2004) which will inform potential reviews of the user charge on an ongoing basis. • Traffic Impact Mitigation Strategy (Document Reference 7.7) – this sets out the process for determining and implementing appropriate mitigation for any localised traffic and traffic-related impacts which arise as a result of the Scheme • Charging Policy (Document Reference 7.11) – this sets out the principles according to which TfL must set and vary the user charges and the procedures that apply when doing so All three documents are included within the DCO application. It is proposed that a governance process will also be established to inform the implementation of these elements, and this provides for the	Ongoing, progressing.		Monitoring Strategy (Document Reference 7.6) Traffic Impacts Mitigation Strategy (Document Reference 7.7) Charging Policy (Document Reference 7.11)		
		HB060	Further commitment required that Silvertown will be delivered as part of a package of river crossings	T Hamlets	TfL acknowledges that the Silvertown Tunnel will not on its own solve all of east London's transport problems. It is one part of TfL's investment in transport infrastructure. As well as other major public transport schemes such as Crossrail, which will provide a new rail link between Greenwich and Newham. TfL is also working on plans for better cross-river connections further east, at Gallions Reach and Belvedere. These plans however are not as far advanced as those for the Silvertown Tunnel, and this application is focussed on the Silvertown Tunnel alone to address as a first priority the problems of congestion, closures and resilience at the Blackwall Tunnel. TfL's plans for east London river crossings, including those for pedestrians, cyclists, public transport and private vehicles, are outlined in Connecting the Capital which can be accessed via TfL's website: http://content.tfl.gov.uk/connectingthecapital-newrivercrossingsforlondon-dec-2015.pdf	Can't be included as DCO but still a priority issue for all 3 HBs		Case for the Scheme (Document Reference 7.1)		
		HB061	Community Fund welcome in principle - needs to cover a local discount / be of a greater quantum / extend beyond 5 years	Greenwich, Newham	In the statutory consultation preceding the submission of the DCO application, TfL proposed that a Community Fund would be available to local boroughs for projects that would enhance the environment or benefit people in areas most directly affected by the Scheme. It was intended as a means of mitigating potential adverse impacts of the Scheme. Subsequently, TfL has continued to engage with the local boroughs and has undertaken further assessments of Scheme impacts. This further work has not demonstrated that a Community Fund would be a necessary or appropriate mitigation. Where a specific adverse impact has been identified an appropriate mitigation has been proposed. <p>A significant proportion of Blackwall Tunnel users are from the local area - the different data sources available suggest 25-30% of peak trips in both directions are from local boroughs. This suggests that a resident discount could significantly undermine the demand management objective of the Scheme and also reduce the revenue to pay for it.</p> <p>This figure also needs to be understood in the broader context of both overall travel patterns for local people and the strategic objectives of the Scheme. For travel to work in the three host boroughs only one in five workers (21%) crosses the river and only 14% of these trips are made by car. This means</p>	Should be replaced with appropriate S106 requirements as part of mitigation of 'unintended or as yet unknown consequences'.		Charging Statement (Document Reference 7.5)		
		HB062	Community Fund should be paid for lifetime of scheme	T Hamlets	See HB062	see above		See HB062		