

SILVERTOWN TUNNEL

Volume 8

Development Consent Order Application

8.38 Comments on Written Representations - Land
Interests Part 2:

The Infrastructure Planning (Examination Procedure)

Rules 2010

December 2016

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Silvertown Tunnel

Development Consent Order Application Comments on Written Representations – Land Interests Part 2

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1 INTRODUCTION

1.1 Purpose of this report

- 1.1.1 This report provides the Applicant's responses to Written Representations (WRs) submitted by Interested Parties (IPs) at Deadline 1 with an interest in land directly affected by the Scheme. The Applicant has categorised these IPs for presentational purposes only and attaches no greater or lesser weight to their WRs than WRs made by other categories of IP.
- 1.1.2 The following IPs' WRs are covered in this report:
- ASD
 - Tarmac
 - Modern College
 - Waterfront Studios Ltd & Newable Property Developments Ltd
 - U&I
 - Trinity (D) Limited
 - Brenntag
- 1.1.3 Please note that those statutory bodies with an interest in land directly affected by the Scheme are dealt with in a separate report entitled 'Comments on Written Representations: Statutory Bodies' for ease of reference. That reports encompasses such bodies' land and non-land related representations.
- 1.1.4 The Applicant has reviewed and considered in detail the matters raised in these WRs and, to assist the ExA, has responded or commented where the Applicant considers there is a significant matter to address. The Applicant's responses and comments on the WRs are set out for each IP in turn. Two response formats have been adopted – narrative (Part 1) and tabular (Part 2) – as considered appropriate by the Applicant in light of the nature and length of the WR, and the choice of format does not indicate any prioritisation or that the Applicant has assigned additional weight to a particular WR.

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2 ASD LIMITED (KLOECKNER METALS UK) and the UK subsidiary of KLOCKNER & CO

2.1 Comments on Written Representation

Table 1 - Key issues identified from Written Representation by ASD Limited (Klockner Metals UK) with TfL’s commentary

| Location in Representation | TfL Reference | Interested Party’s Comment | TfL Comment |
|----------------------------|---------------|---|---|
| Paragraph 10 page 2 | WR.ASD.1 | ASD instructed Steer Davies Gleave (SDG) to consider vehicular access and circulation associated with its site at Silvertown during and post- construction of the proposed Silvertown Tunnel. This technical note is included at Appendix 2 and forms the basis of our representations. It outlines in detail the very specific operational requirements of ASD, and explains how the business utilises | The ASD Limited (trading name Kloeckner Metals UK) site is located within the proposed Silvertown Tunnel construction area. The Applicant has worked together with ASD to explore various temporary mitigation options to mitigate land take required for the Scheme, including: (a) reduction in TfL’s land requirements such |

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| | | <p>its site as efficiently as possible in order to facilitate a successful business. It continues, assessing the implications of the temporary take of land and the potential implications of the realigned access to Dock Road post-completion and sets out what needs to be agreed in terms of access arrangements to ASD's site, if the business is not to be compromised.</p> | <p>that the existing storage area can be retained by ASD,</p> <p>(b) providing an alternative storage area to minimise the disruption to ASD's operation; and</p> <p>(c) providing an alternative access to the ASD site during the construction period from Scarab Close.</p> <p>Provision of a new site access from Scarab Close during construction was considered the most feasible option, and has been agreed in principle by both parties.</p> <p>The Applicant has proposed a temporary relocation of the existing ASD storage area to a new area adjacent to the ASD facility within the Thames Wharf area. The Applicant continues to engage with ASD to discuss the details of this proposal and to identify mitigations to the following impacts on the operation of the ASD facility arising from the potential relocation of the storage area:</p> |
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| | | | <ul style="list-style-type: none"> • ASD's concerns relating to the gradient of the proposed access road, due to level differences, between Scarab Close and the ASD forecourt; and • ASD's concerns relating to the impact of this access on business operations such as sideloader operation, HGV reversing, parking provision and vehicle stacking. |
| <p>Paragraphs 18-22</p> <p>Page 6-7</p> | <p>WR.ASD.2</p> | <p>In principle, ASD accept that temporary access via Scarab Close is the suitable solution during the construction works, however there remain issues with this option which will have a detrimental impact on their operation as currently proposed:</p> <p>Sideloader operation</p> <p>19. Sideloaders can only operate on level surfaces when carrying stock, and can only reverse or operate when handling long steels in a linear site layout with the aid of a banksman. The proposed levels and change of gradients on the temporary road (point E) would be too steep for sideloaders to operate safely. Moreover, the requirement</p> | <p>The Applicant has considered ASD's concerns regarding non-linear layout of materials storage, steep gradients on sideloader operations, and the reduced capacity of HGV's current parking arrangement. The Applicant is continuing to liaise with ASD to identify and propose further solutions that will further mitigate the impacts that ASD have identified. The measures agreed to mitigate the impacts on ASD business operations will be captured in Statement of Common Ground ref. SoCG027 and an agreement.</p> |

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| | <p>for a sideloader to make a sharp turn into the temporary road is considered to be unacceptable from a safety perspective and therefore stock transfer between the temporary storage area (point F) and the ASD forecourt and main storage sheds (points B and C) would not be possible using sideloaders as per current arrangements, reducing the efficiency of the operation.</p> <p>Reversing</p> <p>20. Due to the non-linear layout of the temporary proposals, it is anticipated that lorries will have to carry out additional reversing moves to complete the process of entering the site, dropping off stock, picking up stock and leaving the site. Banksman are used to guide reversing vehicles and an increase in reversing will result in a requirement for additional banksman support, which has a staffing cost implication. Parking provision</p> <p>21. The currently proposed access options via Scarab Close will result in the loss of some on-site lorry parking for vehicle turns. The parking spaces on site are heavily utilised, and any loss of parking space</p> | |
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| | | <p>would be detrimental to the business. An optimal design would result in no loss of parking spaces for HGVs and staff vehicles; alternative off-site storage may otherwise be required.</p> <p>Vehicle stacking</p> <p>22. ASD have advised that it is common to have four or five HGVs waiting on the access road within their site during busy periods (typically mornings) to drop off/pick up steel. At present, lorries wait on the approach route to the main handling area off of Dock Road (point A), however this land would be obtained by TfL under the proposals.</p> <p>23. Any reduction in this on-site handling capability that is not replicated in the new arrangements has the potential for adding difficulties to operations. ASD wish to understand further details on the capacity of the temporary proposals to accommodate surplus stacked lorries whilst waiting to service the site before confirming the acceptability of the current proposals.</p> | |
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| <p>Paragraphs 24-25</p> <p>Page 7</p> | <p>WR.ASD.3</p> | <p>24 Following completion of the Silvertown Tunnel works, ASD would wish to revert to using their current entrance from Dock Road, as this would mean they can revert to the current linear stock handling and production arrangement, which is less staff-intensive and safer. As a result, it is important that the access via the realigned Dock Road works well and trucks can easily turn right into the current access road. The current TfL and Atkins plans introduce a more acute junction than the current layout that could potentially impact on the flexibility of the access and the ability of long loads to access the site.</p> <p>25. As such, ASD Limited wish to be reassured that the realigned access point from Dock Road is suitable for all vehicles accessing the ASD site; in particular, lorries carrying long loads.</p> | <p>The proposed realigned access from Dock Road to the current ASD site will maintain the similar geometric parameters as the existing access from the Dock Road to the ASD site. Vehicular swept paths of the proposed realigned access have been modelled to establish that vehicles that can use the existing access could use the replacement access.</p> |
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3 TARMAC

3.1 Comments on Written Representation

Table 2 - Key issues identified from Written Representation by Tarmac with TfL’s commentary

| Location in Representation | TfL Reference | Interested Party’s Comment | TfL Comment |
|----------------------------|---------------|---|--|
| Page 2, Paragraph 1.1 | WR.TR.2 | There will be an unacceptable economic impact on delivered prices for a network of sites north and south of the River Thames reliant on the river crossing. Presently aggregate and value added products such as ready mixed concrete and asphalt are distributed by the company by road through the Blackwall Tunnel from river connected sites to ensure sustainable delivery of products. The introduction of tolls on both the Blackwall and proposed Silvertown Tunnels will have an adverse impact on the | <p>Whilst the Scheme will introduce user charges to journeys the company makes both northbound and southbound, it will gain significant congestion relief and reliability benefits, reducing staff time and vehicle costs lost to congestion and providing more certainty on travel planning and business operations.</p> <p>As Set out in Summary Table 3 of the Economic Assessment Report [APP-101], it is estimated that, under the Assessed Case charging schedule, HGVs will be the only</p> |

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| | | <p>economics of the business.</p> <p>Any charge for use of the Silvertown Tunnel, and Blackwall Tunnel if that becomes restricted or a toll, will not manage the company's demand for use of the crossing, as the radial miles for business determine market penetration, but will have a direct adverse economic impact on the business.</p> | <p>vehicle type that experiences disbenefits at a Scheme level, with all other vehicle types experiencing net benefits.</p> <p>However, most firms do not rely solely on HGV use. The business will gain from benefits accrued by other vehicles in its fleet.</p> <p>Furthermore, the user charge is intended to encourage firms to consolidate their trips, and to retime their trips to off-peak or night time where possible. The economic impact on the business will therefore depend on the potential to retime trips, the number of trips made, as well as the mix of vehicles that make up the fleet.</p> |
| <p>Page 3, Paragraph 1.1</p> | <p>WR.TR.3</p> | <p>The company mirrors the ExA's concern in first questions SE3 challenging the contention that the scheme will support economic growth and the concern for the negative cost benefit for commercial traffic.</p> | <p>As set out in the Applicant's response to FWQ SE3, although the Scheme will result in disbenefits for HGV users, other business users, including those making trips by car, public transport or LGV, will receive benefits which outweigh the HGV disbenefits. As most businesses do not typically rely solely on HGV use, they will benefit from time savings which are greater than the cost of the charge</p> |

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| | | | <p>for those other vehicle types.</p> <p>As set out in Summary Table 3 of the Economic Assessment Report [APP-101], the Scheme will result in total net benefits of £503m for businesses once user charging costs have been taking into account, including reliability benefits.</p> |
| <p>Page 4, Paragraph 1.3</p> | <p>WR.TR.4</p> | <p>The company predicts that a consequence of the charge will likely be to pull more material in from operations further east increasing the volume of HGV traffic through London boroughs. TfL has not undertaken an appraisal of the effects of the Scheme on specific businesses and it would be interesting to evaluate the impact on the minerals sector.</p> | <p>See Report 'Comments on Borough LIRs and WRs' (Sub theme "Numbers of HGVs will increase" and "Induced demand").</p> <p>While the Applicant has not undertaken a detailed assessment of specific sectors, it has undertaken a comprehensive Economic Assessment [APP-101]. The monitoring programme could cover these aspects and evidence from other sources could be considered.</p> |
| <p>Page 4, Paragraph 2.1</p> | <p>WR.TR.5</p> | <p>The ExA first questions invites information on the impact on safeguarded wharves of the scheme and the company would seek to put forward RVD(RE) (Royal Victoria Dock,</p> | <p>The Applicant understands that Tarmac holds a short term lease of this land due to expire before construction of the Scheme commences. Furthermore the planning</p> |

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| | | <p>Rear Entrance) for consideration. The site is operated by Tarmac under the terms of a lease from Quintain. The aggregates needs of the concrete batching plant (sand and gravel) are imported through the wharf and the impact of the scheid during construction and after could result in the site's closure. It may be possible with discussions between TfL and the company that modifications to the proposed jetty referred to in 3.1 below may allow for the batching plant and wharf to continue to operate.</p> | <p>permission for the land will expire before construction of the Scheme commences.</p> <p>This land does not form part of a safeguarded wharf, but does form part of the land safeguarded for the Scheme, and so the lease was entered into in the knowledge that the Scheme could potentially be brought forward and affect the land.</p> <p>The Applicant therefore expects that Tarmac will no longer be on site at the time it seeks to use its DCO temporary possession powers.</p> |
| <p>Page 5, Paragraph 2.2</p> | <p>WR.TR.6</p> | <p>Little weight has been placed on the importance of the site as a wharf or its position in the local ready mixed concrete supply chain. The tunnel scheme anticipates using local businesses for construction materials and there is an expectation that reasonable endeavours to maximise the opportunities for local firms to win contracts should be taken. TfL has previously stated that it will seek to acquire land necessary to establish plants by negotiation and compensate businesses displaced by the</p> | <p>The Scheme requires the worksite which includes the area in which Tarmac operations are currently situated, as is illustrated in the Construction Method Statement, in order to construct the works.</p> <p>Whilst it is recognised that certain construction materials are made on the site that will be required for construction of the Scheme, the Applicant as a public body cannot give an undertaking to utilise a particular supplier of goods or services for the</p> |

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| | | <p>scheme with a qualifying interest in land in accordance with the Compensation Code. It is uneconomic to displace existing established businesses with capability and capacity to serve the project concrete and aggregates supply needs in favour of establishing alternative operations.</p> | <p>Construction of the Scheme.</p> <p>Furthermore, as discussed elsewhere in the Applicant's response to Tarmac, the occupation of the site by Tarmac at the time of construction of the Scheme is not certain, and so investigating a particular supply arrangement in these circumstances would not be appropriate for the Applicant.</p> |
| <p>Page 5, Paragraph 2.3</p> | <p>WR.TR.7</p> | <p>Minor alteration of the scheme would allow an access to the Dock Road plant to be retained throughout the construction phase, ensuring an uninterrupted supply to the construction site, and after construction to ensure the site's availability to supply future redevelopment needs in the area.</p> | |
| <p>Page 6, Paragraph 2.4</p> | <p>WR.TR.8</p> | <p>The NIPRA notes that marine access to the wharf which is referred to as Dockland Wharf in the documents may possibly be reduced. The company is concerned that dredging of the river bed required for the not afloat but safely aground (NABSA) facility adjacent to Thames Wharf and associated</p> | <p>The Applicant has undertaken sediment transport simulations as part of the environmental impact assessment of the Scheme, to demonstrate the impact of the in-river proposals. This is presented within Appendix 16.B, Hydrodynamics Modelling of</p> |

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| | | <p>with the creation of the jetty could alter the collection and pattern of sediments and the draft around the RVD(RE) become silted up and impact on use of the wharf.</p> | <p>the Environmental Statement [APP-078].</p> <p>The sediment accumulation results under the worst case scenario for sediment accumulation in the vicinity of the jetty (neap tide and high river flow) shows maximum values of around 3-4g/m².</p> <p>The increase in sediment depth is calculated as:</p> $X / ((1 - n)Y)$ <p>Where X is the accumulation of sediment mass (0.004kg/m²), n is the porosity (0.4) and Y is the dry density of sediment (800kg/m²). This gives a very low depth of sediment accumulation (8.3x10⁻⁶m).</p> <p>On this basis, the reuse of the NABSA, dredging works associated and the temporary jetty (if selected by the Contactor) are not predicted to cause significant sediment accumulation around Tarmac's site located</p> |
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| | | | <p>near to the proposed jetty structure.</p> <p>On completion of the works, the Applicant believes that the safeguarded wharf may be used by its existing land owners, in the same way as it is being used prior to construction of the Silvertown Tunnel Scheme.</p> |
| <p>Page 6, Paragraph 3.1</p> | <p>WR.TR.9</p> | <p>The scheme neglects to maximise use of existing wharf facilities on the river for aggregates supply during the project and reduces the available wharf capacity into the future. The scheme [though] neglects the existing facility at RVD(RE) and proposes its removal. Retention of this facility during and after the scheme would contribute to the use of the river for transportation of materials and allow continued use into the future. It is possible with some modification that the temporary jetty and the company's business could coexist with cooperation during construction and if guide piles for the company's barges to move against when coming in and out of the dock were inserted as a part of the construction.</p> | <p>Please see the response to WR.TR.6-7 above.</p> |

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| <p>Page 7, Paragraph 3.2</p> | <p>WR.TR.10</p> | <p>The company predicts that an impact of creating an economic barrier through a user charge, will be to encourage demand north of the river to be met from sites further east of the market. This will potentially effectively switch supply from more sustainable river transport to road haulage through the London boroughs.</p> | <p>Whilst the Scheme will introduce user charges to journeys the company makes both northbound and southbound, it will gain significant congestion relief and reliability benefits, reducing staff time and vehicle costs lost to congestion and providing more certainty on travel planning and business operations.</p> <p>As Set out in Summary Table 3 of the Economic Assessment Report [APP-101], it is estimated that, under the Assessed Case charging schedule, HGVs will be the only vehicle type that experiences disbenefits at a Scheme level, with all other vehicle types experiencing net benefits.</p> <p>However, most firms do not rely solely on HGV use. The business will gain from benefits accrued by other vehicles in its fleet.</p> <p>Furthermore, the user charge is intended to encourage firms to consolidate their trips, and to retime their trips to off-peak or night time where possible. The economic impact on the business will therefore depend on the potential to retime trips, the number of trips</p> |
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| | | | made, as well as the mix of vehicles that make up the fleet. |
| Page 8, Paragraph 4.1 | WR.TR.11 | When determining planning applications, local planning authorities in accordance with paragraph 144 should “not normally permit other development proposals in mineral safeguarding areas where they might constrain potential future use for these purposes”. The DCO must align with the NPPF and seek to observe protection afforded to wharves and concrete batching plant sites. | This representation is not understood. The land has not been safeguarded by the LB of Newham for concrete batching or minerals. In fact, the land has been clearly safeguarded for the “Silvertown Crossing Safeguarding” since 1995. The application therefore is not contrary to paragraph 144 of the NPPF as the development would not be within a mineral safeguarding area. |
| Page 8, Paragraph 5.1 | WR.TR.12 | No compelling case for all plots proposed to be subject to compulsory acquisition. The Dock Road site is included within the scheme area but none of the land is needed for implementation of the scheme save for a short section of the access road. Minor amendments to the scheme could enable the site to continue to be beneficially occupied for the positive benefit of the scheme in supply of construction materials and ensure retention of a site use with | The Applicant is seeking temporary possession of all plots occupied by Tarmac for the purposes of creating a construction worksite. The envisaged layout of the construction worksite including the range of construction methods and processes to be deployed for the construction of the Scheme is described in the Construction Method Statement [APP-046] and associated worksite layout plans. Additionally, the Applicant is seeking |

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| | | <p>national safeguarding protection.</p> | <p>permanent acquisition of a number of plots currently occupied by the Tarmac plant and, Tarmac access road.</p> <p>The reasons for the permanent acquisition of plots currently occupied by Tarmac are set out in Appendix A to the Statement of Reasons [APP-015]. This Appendix demonstrates that these plots are required for construction of the cut and cover section of the tunnel itself (which, for the reasons given in the Statement of Reasons, are justified in the public interest to be compulsorily acquired), and for the provision of a new access road to businesses from Dock Road. Access to the site currently occupied by Tarmac would therefore still be possible in the long term.</p> |
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4 MORDEN COLLEGE

4.1 Comments on Written Representation

Table 3 - Key issues identified from Written Representation by Morden College with TfL's commentary

| Location in Representation | TfL Reference | Interested Party's Comment | TfL Comment |
|-------------------------------|---------------|---|--|
| Chapter 1. Paragraph 2-4, p.2 | WR.MC.1 | The proposed scheme will adversely impact on both normal and emergency access (via Tunnel Avenue and Morden Wharf Road) to these tenancies (U&I, sub-tenants Brenntag Inorganic Chemicals Limited, Hanson Quarry Products Europe Limited and Thames Craft Dry Docking Services Ltd) during the construction period and at present it is not clear from the Transport Assessment of Construction Method Statement how, and to what extent, access will be maintained throughout the project for the numerous HGV and other vehicle | The information regarding construction traffic matters which has been provided in the Construction Method Statement [APP-046] and the Transport [APP-086] are based on the current understanding of how the Scheme could be constructed, noting that there are elements of construction that are unlikely to be able to be determined until a later time. In light of this, the purpose of the Code of Construction Practice [REP1-119] is to set a framework to control possible impacts arising from the construction of the Scheme. |

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| | | <p>movements that currently take place to and from these sites from Tunnel Avenue on a daily basis.</p> <p>We welcome the recent discussions between TfL and the College's tenants, and also with Gerald Eve to seek to resolve this issue, but at present we have not seen sufficient detail on how 24 hour access to College land will be achieved. We therefore do not currently agree with the proposals in this respect.</p> <p>In addition, we note the Transport Assessment (document ref.6.5) states that access to the southern part of Tunnel Avenue will be maintained throughout construction, while access to the northern section of Tunnel Avenue would be maintained via Millennium Way. However on page 192 of the Transport Assessment it states that "traffic management" will be in place on Tunnel Avenue when the new Boord Street footbridge is being constructed</p> | <p>Specifically in relation to construction traffic and as stated in Section 3.1.4 of the CoCP, <i>“detailed construction and delivery traffic routes will be specified and agreed by the relevant planning authority in consultation with the relevant highway authority, with local roads only to be used for immediate access to the worksites or local businesses (including wharves).”</i> Ultimately and as stipulated within the CoCP, these construction vehicle routes will be set out within Construction Traffic Management Plans (CTMPs) which must set out the expected volume, type and impacts associated with construction vehicle routes. This is expected to include assessments of any localised impacts, management and contingency planning where appropriate in order to comply with the requirements of the CoCP.</p> <p>In due course and with a greater understanding of the expected construction methods and phasing (including that for the Boord Street footbridge), construction plans and temporary access arrangements will be developed in consultation with local businesses in accordance with the CoCP with</p> |
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| | | <p>in phase 1 and it is unclear how this will enable access to be maintained to College land 24 hours a day at the relevant points shown in Appendix 2.</p> <p>We therefore request greater clarity and details on how access will be maintained to College land (including more detailed worksite construction phasing plans) and guarantees to ensure continuous access is provided.</p> | <p>arrangements to be detailed within the CTMPs.</p> <p>The Applicant is in discussions with Morden College and its tenants as to the precise needs of their operational requirements and will be entering into agreements with them which will make provision for access to be maintained throughout construction.</p> |
| <p>Chapter 3. Paragraph 1, p.3</p> | <p>WR.MC.3</p> | <p>During the Silvertown Tunnel construction works traffic conditions in and around the Tunnel Avenue area may be affected. The Transport Assessment sets out a phased approach to construction and access on roads around each construction site, but it is unclear to what extent traffic conditions and congestion on the surrounding network will change during construction and how this will impact on the ability of tenants of the College to continue their normal business activities during the construction phase.</p> | <p>Initial forecasts associated with the likely traffic impacts during construction are continually being updated, such as those currently associated with revisions to construction traffic forecasts to incorporate the Mayor's 55% commitment to river transport are currently underway and will be reported in due course. However, the assessments undertaken and presented in the Transport Assessment [APP-046] were based on the lower 50% proportion of all construction related traffic being transport by river, and show no significant effects on the</p> |

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| | | <p>We therefore do not agree with the aspect of the proposals at present, and request that further clarity is provided on how local road traffic conditions in the vicinity of the Greenwich construction site will be affected during construction (e.g. additional traffic congestion) in order to establish what effect this will have on tenants of the College.</p> <p>We would then request that account is taken of the findings of this work when finalising the details of the Greenwich worksite construction and access phasing in order to minimise the impact on College tenants.</p> | <p>road network from the construction works.</p> <p>Final construction traffic estimations will be determined by the Contractor much closer to the commencement of works, with all necessary management measures to be subsequently identified and detailed within Construction Traffic Management Plans (CTMPs). In accordance with the Code for Construction Practice (CoCP) [REP1-119], the impacts of construction must take into consideration the possible impacts to local businesses and surroundings of each construction site.</p> <p>Impacted parties will also be kept informed of the changes to access routes through the Community Liaison Group and co-ordination and communication meetings with stakeholders, as set out in the CoCP.</p> |
| <p>Chapter 4. Paragraph 1, p.4</p> | <p>WR.MC.4</p> | <p>The construction works for the Silvertown Tunnel and also for the potential car park relocation work outlined in point 2, may adversely impact on land currently owned by</p> | <p>An assessment of the Morden College site, lease by Brenntag, has been completed using data provided by Brenntag (Aecom, 2016 60478439\LERP0001\Issue), this data</p> |

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| | | <p>the College or adjacent land, through the potential disturbance of existing ground conditions causing contamination and/or the subsequent migration of contamination.</p> <p>We do not agree with this aspect of the proposals and therefore request that TfL formally accepts liability for any costs associated with the clean-up of any contamination which is caused as a result of their works.</p> | <p>indicated the following:</p> <ul style="list-style-type: none"> • soil analytical data indicated that the area to be developed as part of the Silvertown tunnel Scheme and the carpark relocation area is unlikely to pose a risk to further site users (commercial) assuming a surface car park end-use, and therefore remediation of soils is not considered a requirement of these works; • due to the depth of groundwater and the expected shallow nature of the works it is considered unlikely that the development will adversely impact groundwater, or vice versa, that groundwater would impact on the proposed construction; • remediation of groundwater in the River Terrace Deposits is not considered necessary based on the monitoring results and the generally poor quality groundwater in this aquifer throughout the Greenwich peninsula; • the presence of asbestos in one soil |
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| | | | <p>sample collected from the area indicates that there may be a potential risk to workers, this can be managed during the construction period through the application of established normal good practice for working on brownfield sites;</p> <ul style="list-style-type: none">• following completion of the construction phase there should be no risk to end users of the site as the carpark construction will provide an effective barrier between site users and any underlying contamination in made ground; and• all waste material, including made ground and other soils produced during the works, will need to be classified and managed appropriately. <p>The development of the overbridge structure is not considered to pose a risk to the land currently owned by the College or adjacent properties in relation to residual contaminated land for the following reasons:</p> |
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| | | | <ul style="list-style-type: none"> • the potential risk to groundwater from piling associated with the development of the foot bridge will be managed appropriately; • appropriate mitigation will be undertaken to control dust and odours during construction; and • a groundwater monitoring strategy has been established, which will monitor groundwater quality across the Scheme, and, as required by the CoCP, inform the detailed Groundwater Monitoring and Verification Plan for the Scheme that is required to be produced by the Contractor. Monitoring will be undertaken prior to construction to derive a baseline against which data collected during the construction and post construction period can be compared and any impact from the construction identified. <p>The CoCP outlines the approach the contractor will take to limit potentially adverse contamination impacts during the project,</p> |
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| | | | <p>these measures are set out within paragraphs 9.2.1 – 9.2.9 and 9.3.1 – 9.3.6 of the CoCP and will be incorporated within the Construction Environmental Management Plan and Construction Materials Management Plan to be developed by the Contractor.</p> <p>Based on both the information provided and on the proposed works (development of a foot bridge and relocation of a carpark), the potential for the disturbance of existing ground conditions to cause contamination and/or the subsequent migration of contamination is considered low.</p> <p>The Applicant’s response to First Written Question GL8 explains the position in regards to liability for any contamination linkages caused by the Scheme.</p> |
| <p>Chapter 5. Paragraph 1, p.4</p> | <p>WR.MC.5</p> | <p>The land in the freehold ownership of the College to the south of Morden Wharf Road has short and medium term redevelopment potential. This is highlighted in the</p> | <p>The envisaged construction programme contained within the Construction Method Statement [APP-046] provides a robust construction solution for the scheme, and</p> |

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| | <p>Greenwich Peninsula West Master plan SPD adopted by the Royal Borough of Greenwich in 2012. The key access point to this part of the College's land ownership from Tunnel Avenue as shown in Appendix 2.</p> <p>Based on our understanding of the Transport Assessment and Construction Method Statement, the ability of Morden College and its tenants to access this land during the period of the Silvertown Tunnel construction works may be limited. This may delay or impinge upon future redevelopment proposals and we therefore do not agree with this element of the Silvertown Tunnel proposal.</p> <p>We there request greater clarity, more detailed worksite construction phasing plans and guarantees in terms of maintaining access to the College's land via Morden Wharf Road and existing access from Tunnel Avenue adjacent to Thames Bank House throughout the Silvertown Tunnel construction period, as in our view, the existing Transport Assessment and</p> | <p>demonstrates that the proposed time scales are achievable. It is subject to change during both the detailed design and subsequent construction phases as a result of changes to the timescales for statutory processes and construction award, or through the Contractor optimising the design and construction proposals.</p> <p>As set out in the CoCP [REP1-119], the Contractor will take measures to maintain reasonable access to premises during the construction works. These will include the active management of access arrangements to business premises that will continue during the construction phase.</p> <p>Detailed worksite construction phasing will be developed through the detailed design. The impacts in terms of maintaining access will be included in the Construction Traffic Management Plan (CTMP). A CTMP will be</p> |
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| | | <p>Construction Method Statement are unclear in this report.</p> | <p>produced by the Contractor for each worksite and approved by the relevant planning authority in consultation with the relevant highway authority. Impacted parties will be kept informed of the changes to access routes through the Community Liaison Group.</p> <p>The Applicant is in discussions with Morden College and its tenants and in the case of Brenntag and Greenwich Limited TfL is seeking to enter into agreements to resolve their concerns, including access, as far as is reasonably practicable.</p> |
| <p>Chapter 6. Paragraph 1, p.4</p> | <p>WR.MC.6</p> | <p>We agree and accept the principle of the need to charge for the use of the proposed Silvertown Tunnel. However, it is noted that in the Silvertown Tunnel Charging Statement dated April 2016, the current proposals exclude any specific discounts for the local residents or businesses , on both the Blackwall and Silvertown Tunnel and we would disagree with this element of the</p> | <p>See 'Comments on Borough LIRs and WRs' (sub theme "In support of Business Discount") report submitted at Deadline 2</p> |

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| | | <p>Silvertown tunnel proposals.</p> <p>This is because we believe that the current proposals for the introduction of a Blackwall tunnel charge will have the effect of significantly increasing the business costs of our client's tenants who located to the site on the reasonable assumption that a road tunnel constructed in 1897 would remain free of charge. Costs of tunnel usage will not be factored into current operating costs which, as a result, may negatively affect the value and future lettability of the College's property.</p> <p>On this basis, we strongly oppose the introduction of a Blackwall tunnel charge at any price level, unless a mechanism could be introduced that excepted, or minimised, the charge to local businesses in the immediate vicinity of the tunnels.</p> | |
| <p>Chapter 7. Paragraph 3, p.5</p> | <p>WR.MC.7</p> | <p>It is noted that the Silvertown tunnel DCO scheme design for Tunnel Avenue does not appear to provide northbound and southbound bus stops despite becoming a</p> | <p>Detailed proposals for the future bus network serving the Blackwall and Silvertown tunnels would be developed nearer to the time of opening. This is because typical lead-in times</p> |

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| | | <p>two way road as part of the proposals, and existing bus stops currently being present. This will adversely impact on accessibility for those living and working on the western side of the Greenwich Peninsula both now and in the future.</p> <p>Whilst we understand that detailed routing is still being considered, we believe this is a significant omission from the Silvertown Tunnel SCO scheme, and misses a clear opportunity to maintain and enhance the existing 180 bus route and / or other local bus routes. We therefore disagree with this element of the proposals.</p> <p>We therefore request that in line with national and regional planning policy, safe northbound and southbound bus stop facilities on Tunnel Avenue close to the proposed Boord Street overbridge should be provided as part of the Silvertown Tunnel design, to encourage public transport access for the new homes and jobs on the western side of the Peninsula.</p> | <p>for TfL bus route changes are relatively short (circa 2 years) which enables the future situation to better be taken into account. It is expected that bus route 108 would continue to be routed on Tunnel Avenue in the northbound direction, with a northbound bus stop close to the Boord Street foot and cycle bridge, however the bus stops would be implemented by TfL using existing powers and the Applicant does not consider that the stops should be specified in the DCO application. Any changes to the bus network and associated bus infrastructure such as bus stops that are required as part of future proposed developments would be considered as part of the planning process for new developments as they come forward.</p> |
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| <p>Chapter 8. Paragraph 2, p.5</p> | <p>WR.MC.8</p> | <p>There is inadequate cycle and pedestrian infrastructure provision on Tunnel Avenue as part of the proposals. The scheme should lock-in cycle access and safety improvements now, not create new safety concerns for the future. This was highlighted in our previous representations of 27th November 2015 and 30th August 2016.</p> <p>The proposed Boord Street overbridge has ramps onto a narrow footway on Tunnel Avenue without purpose-built cycle facilities. This will mean pedestrians and cyclists will arrive onto the western side of Tunnel Avenue with no provision for safe cycle movements southwards towards Morden Wharf, to new housing and a cruise liner terminal further south, all of which will require the overbridge for safe connection to North Greenwich centre and the London Underground. In our view this creates a safety concern, and this has also been confirmed in advice provided by U & I Group plc by Ramboll.</p> <p>We therefore believe that the design of the</p> | <p>The Update Report [AS-021] provided to the ExA following the Mayoral review of the Scheme states that the Mayor has asked the Applicant to explore a set of public realm enhancements. This includes enhancements to public realm and pedestrian and cycling infrastructure on both Tunnel Avenue and Boord Street.</p> <p>The form and delivery mechanism for these enhancements are currently being developed in discussion with RB Greenwich who are supportive of the current approach, and further submissions to the Examination will be made in due course. During these discussions consideration will be given to the proposals submitted by U+I and highlighted by Morden College in their written representations.</p> <p>Design Principles LSCP.01-LSCP.12 in [AP-096] provide commitments to delivering a high quality public realm for pedestrians and cyclists in the Scheme design. This would include Tunnel Avenue.</p> <p>Given the potentially changing context of the</p> |
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| | | <p>Boord Street overbridge should be revised that the ramps and landing area minimise conflict, maximise safety and enable cyclists to pass between the ramp and cycle lanes; sufficient width is allowed for the proposed footway; and safe cycle lanes are provided on Tunnel Avenue.</p> | <p>Greenwich Peninsula, PRBD.11 also commits the Applicant to work closely with adjacent land owners to integrate the Scheme with emerging plans. BRDFB.01 and BRDFB.02 focus specifically on the replacement Boord Street bridge and the need for it to integrate to emerging proposals for adjacent sites ensuring that it is designing in a way that can be adapted to future scenarios.</p> <p>The Applicant also proposes to set up a Stakeholder Design Consultation Group giving adjacent landowners an opportunity to comment on the detailed design as they emerge. The terms of reference for this group will be submitted as part of an updated set of Design Principles at Deadline 2.</p> <p>With regard to the inclusion of bus stopping facilities on Tunnel Avenue, the Applicant recognises and supports U+I's interest in ensuring appropriate levels of connectivity for existing and future users of Morden Wharf, including access to public transport services. The submitted proposals support these objectives by providing full access on Tunnel Avenue for two-way traffic and</p> |
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| | | | <p>redesigning it as pedestrian friendly environment. This is in addition to the significant enhancements to the bus network in the area that would be facilitated by the Scheme. The Applicant considers that the Scheme does not preclude the ability for southbound bus facilities to be provided in the vicinity of those proposed in U+I's Written Representation at a later date.</p> <p>The result of the Scheme is therefore a more flexible road network and increased potential for the Applicant to provide the requested bus facilities if demand exists. Any changes to the network implemented as part of the Scheme will be agreed closer to the time of Scheme opening, as part of TfL's bus network planning. However the Scheme as it is submitted does not preclude such changes.</p> |
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5 WATERFRONT STUDIONS LTD & NEWABLE PROPERTY DEVELOPMENTS LTD

5.1 Comments on Written Representation

Table 4 - Key issues identified from Written Representation by Waterfront Studios Ltd & Newable Property Developments Ltd with TfL’s commentary

| Location in Representation | TfL Reference | Interested Party’s Comment | TfL Comment |
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| Pages 3 - 4 | WR.WST.1 | Sets out the assurances sought by Waterfront under the agreement, these are (summarised): 1) TfL will construct a temporary car park, 47 spaces 2) Post construction TfL will construct a permanent replacement car park, providing at least 47 spaces, 3) During construction TfL will ensure the number of HGV movements on North Woolwich Road directly attributable to the construction of the tunnel will be no more than the number of movements at the | The Applicant is in the process of discussing an agreement outside of the scope of the DCO with Waterfront, Newable and LB Newham, with a view to addressing the overarching concerns raised in respect of the existing car park. It is hoped that this can be concluded as soon as possible during the examination. |

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| | <p>present time. 4) TfL must provide reasonable vehicular and pedestrian access to a further car park directly adjacent to the Studios from the portion of Dock Road realigned by TfL. 5) TfL, Newable and Waterfront to liaise in respect of ST works and TfL to keep them informed as to timings and programming of works. 6) TfL to use reasonable endeavours to require its contractor to minimise traffic using any site entrance to the ST construction site within 100m of the front entrance of the Studios. 7) TfL to provide a draft copy of the CTMP to Newable and Waterfront for comment, prior to submission to LPA. 8) TfL to have regard to any reasonable representations made by Newable or Waterfront on the CTMP. 9) At least 14 days before applying to stop up, alter or divert any part of North Woolwich Road, Dock Road and the underpass beneath Silvertown Way TfL must provide details of the proposed application to Newable and Waterfront and have regard to any reasonable representations. 10) TfL must offer Newable and Waterfront membership of the Community Liaison Group created in accordance with the</p> | |
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| Page 4 | WR.WST.2 | <p>Waterfront is seeking agreement from TfL that it will meet the costs of relocating the current main entrance to the Studios away from the ST construction site to mitigate the impacts of the construction works. The works will cause significant noise and dust, adversely impacting on the Studios and could lead to tenants exercising their break clauses and Waterfront suffering a loss. Tenants are on 3 month rolling break clauses so Waterfront is very concerned that tenants could start to leave very quickly before mitigation works could be carried out. Waterfront considers that the temporary relocation of the front entrance to the dock side would partially mitigate against those losses.</p> | <p>The Applicant is currently discussing an agreement outside the scope of the DCO, the terms of which are proposed to include an agreement to maintain access to Waterfront Studios at all times to ensure the operation of the business during the construction of the tunnel is uninterrupted. The Applicant will ensure that Waterfront and Newable are kept informed of the work in order to keep disruption to a minimum.</p> <p>On this basis, the Applicant does not consider it necessary to relocate the front entrance and therefore to meet the costs of the same.</p> |

6 U&I

6.1 Comments on Written Representation

Table 5 - Key issues identified from Written Representation by Nathaniel Lichfield and Partners on behalf of U and I Group PLC with TfL's commentary

| Location in Representation | TfL Reference | Key issue from Interested Party's Written Representation | TfL Comment |
|----------------------------|---------------|---|---|
| Whole Representation | WR.UI.1 | Two options of outline potential improvements to the bus, cycle and pedestrian facility on Tunnel Avenue has been presented in U&I's rep to enable future land-use development west of Tunnel Avenue relative to the land boundaries applied for. | <p>The Update Report [AS-021] provided to the ExA following the Mayoral review of the Scheme states that the Mayor has asked the Applicant to explore a set of public realm enhancements. This includes enhancements to public realm and pedestrian and cycling infrastructure on both Tunnel Avenue and Boord Street.</p> <p>The form and delivery mechanism for these</p> |

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| | | | <p>enhancements are currently being developed in discussion with RB Greenwich who are supportive of the current approach, and further submissions to the Examination will be made in due course. During these discussions consideration will be given to the proposals submitted by U+I and highlighted by Morden College in their written representations.</p> <p>Design Principles LSCP.01-LSCP.12 in [AP-096] provide commitments to delivering a high quality public realm for pedestrians and cyclists in the Scheme design. This would include Tunnel Avenue.</p> <p>Given the potentially changing context of the Greenwich Peninsula, PRBD.11 also commits the Applicant to work closely with adjacent land owners to integrate the Scheme with emerging plans. BRDFB.01 and BRDFB.02 focus specifically on the replacement Boord Street bridge and the need for it to integrate to emerging proposals for adjacent sites ensuring that it is designing in a way that can</p> |
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| | | | <p>be adapted to future scenarios.</p> <p>The Applicant also proposes to set up a Stakeholder Design Consultation Group giving adjacent landowners an opportunity to comment on the detailed design as they emerge. The terms of reference for this group will be submitted as part of an updated set of Design Principles at Deadline 2.</p> |
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7 TRINITY (D) LIMITED

7.1 Comments on Written Representation

Table 6 - Key issues identified from Written Representation by Trinity (D) Limited with TfL’s commentary

| Location in Representation | TfL Reference | Interested Party’s Comment | TfL Comment |
|----------------------------|---------------|--|---|
| Page 2, Paragraph 10 | WR.TD.1 | To date, TfL has not provided Trinity D with a meaningful and satisfactory solution or suitable alternative proposals in relation to Trinity D's interest in the Car Parking Land. | <p>The Scheme has no permanent impacts on car parking provision on the Greenwich peninsula.</p> <p>During the construction of the Scheme any parking affected will be temporarily replaced as set out in the CoCP [REP1-119].</p> |

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| <p>Page 2, Paragraph 11</p> | <p>WR.TD.2</p> | <p>Trinity D does not consider there to be a compelling case in the public interest to justify the making of the DCO unless and until Trinity D's important and relevant concerns are satisfactorily addressed. Trinity D remains of the view that the DCO should not be made in its current form, and development consent should not be granted, unless and until Trinity D's long term right to parking, and the corresponding public interest in the same, is protected.</p> | <p>The Applicant is currently in discussions with Knight Dragon, AnSCO Arena Limited and Trinity D Limited, which are aimed at securing agreement between the parties with respect to the provision of replacement car parking spaces.</p> <p>The Applicant notes that the Scheme has no permanent impacts on car parking provision on the Greenwich peninsula.</p> <p>During the construction of the Scheme any parking affected will be temporarily replaced as set out in the CoCP [REP1-119].</p> |
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8 BRENNTAG

8.1 Comments on Written Representation

Table 7 - Key issues identified from Written Representation by Brenntag with TfL’s commentary

| Location in Representation | TfL Reference | Interested Party’s Comment | TfL Comment |
|----------------------------|---------------|--|---|
| Pages 1-3 | WR.BN.1 | <p>Greenwich site reconfiguration:</p> <p>The precise extent, timing and phasing of the package of accommodation works to be undertaken by TfL at the Greenwich site are matters which remain under discussion between Brenntag and TfL. In particular, the number of staff & visitor car parking spaces to be re-provided, the list of on-site assets which will need to be demolished or replaced/relocated, the extent of non-operational land to be reclaimed and remediated (and the acceptance of liability in respect of any associated ‘clean-up’</p> | <p>As can be seen in the Statement of Common Ground with Brenntag submitted at Deadline 1 [REP1-143], TfL has been engaging in extensive discussions with Brenntag in order to reach an agreement on all of the issues raised in its representation.</p> <p>It is anticipated that further submissions will be made to the Examination in due course on these matters, further to changes that have already been made to the CoCP at Deadline and Deadline 2 with regards to construction traffic, but in the interim all efforts are being</p> |

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| | <p>costs) in order to facilitate the implementation of the accommodation works, and the precise location of any construction compound/welfare facilities required in connection with the works are still to be agreed.</p> <p>Availability of main access into the Greenwich site:</p> <p>TfL proposes that the main vehicular access gate to the Greenwich site is to be moved slightly and an automated sliding gate arrangement provided. The details of this arrangement are presently being investigated by TfL.</p> <p>Furthermore, the mechanism through which the Code of Construction Practice and Community Engagement Plan and, in particular, the assurances those documents (and others) give regarding the management of local traffic conditions during the Project construction period and how the availability of access to business premises located along Tunnel Avenue, including the Greenwich site, will be secured, remains a matter of significant</p> | <p>made to reach an agreement with Brenntag to formalise an agreed position.</p> |
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| | | <p>importance to Brenntag. In this regard, we note the questions raised by the Examining Authority requiring the submission of an updated Mitigation Route Map and Code of Construction Practice, the securing of compliance with the measures contained in the Construction Method Statement and the Construction Traffic Management Plan, together with comments on the content of Schedule 14 to the draft DCO and the list of application documents to be certified by the Secretary of State. We will be closely reviewing TfL's response to these questions on behalf of Brenntag at Deadline 1.</p> <p>Creation of a new emergency/secondary access into the Greenwich site:</p> <p>The Greenwich site is currently served by an emergency/secondary access off Morden Wharf Road, which will become permanently unavailable once the construction of the Project starts. Accordingly, an alternative emergency/secondary access is required to be identified and the options available are in the process of being considered by Brenntag and TfL. Of particular concern are the works required to create the emergency/secondary access and the traffic</p> | |
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| | | <p>management measures which will need to be put in place in order to ensure that the chosen access can function as a genuine secondary access during the Project construction period.</p> <p>Movement of Brenntag staff and visitors between the car park and Greenwich site office building:</p> <p>Brenntag and TfL are agreed that a suitable pedestrian route, providing access from the staff & visitor car park to the Greenwich site office building, needs to be identified. The route must direct pedestrians away from operational areas within the Greenwich site, if the requirement for personal protective equipment to be worn is to be avoided, and must be managed in such a way as to eliminate the possibility of conflicts arising between pedestrians and the construction works for the Project. Whilst preliminary discussions have taken place between Brenntag and TfL in relation to a permanent, operational phase solution, it is acknowledged that pedestrian circulation around the Greenwich site will be</p> | |
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| | | particularly challenging during the Project construction period as, in all probability, the pedestrian route will need to be flexible and subject to change. | |
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