

SILVERTOWN TUNNEL

Volume 8

Development Consent Order Application

8.40 Comments on Written Representations – Other
The Infrastructure Planning (Examination Procedure)

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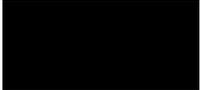
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Silvertown Tunnel

Development Consent Order Application Comments on Written Representations - Other

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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. 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:

- Campaign for Better Transport
- Association of British Drivers
- Motorcycle Action Group
- Bazalgette Tunnel Limited
- British Land (King & Wood)
- ExCeL London

1.1.3 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 in a tabular format.

2 CAMPAIGN FOR BETTER TRANSPORT

2.1 Comments on Written Representation

Table 1 - Key issues identified from Written Representation by Campaign for Better Transport with TfL’s commentary

Location in Representation	TfL Reference	Interested Party’s Comment	TfL Comment
Principal issues part 1, page 1	WR.CBT.1	The London Plan (March 2016) sets out clear policies for all development proposals in terms of improving air quality (Policy 7.14), which on their face would appear to reject the Silvertown Tunnel proposals. In particular, the policy calls for “greater use of sustainable transport modes” and that new development should “at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality” (Editors note - reference London Plan Chapter 7 (March	The Air Quality assessment for the Scheme [AS-022] has demonstrated that air quality is improved as a result of the Scheme in those areas where existing air quality is poorest (i.e. in Tower Hamlets around the northern portals of the Blackwall Tunnel). The assessment fully considers the rerouting of traffic as a result of the Scheme utilising the outputs from the traffic model. The Scheme therefore has a beneficial impact at receptors which are predicted to experience the highest pollutant

		<p>2016). We have previously expressed concerns that any increase in traffic volumes, even spread between the existing Blackwall Tunnel and proposed Silvertown Tunnel, will inevitably lead to a worsening in air quality, given that motor vehicles are responsible for 80% of NOx emissions in areas around major roads.</p>	<p>concentrations.</p> <p>The Scheme has been assessed in accordance with the National Networks National Policy Statement (NN NPS) and does not result in a significant impact on air quality.</p> <p>Regarding the London Plan' air quality neutral policy (Policy 7.14), it should be noted that this policy does not apply to road schemes such as the Silvertown Tunnel. A full response in relation to this can be found in the Applicant's response to First Written Questions (FWQ) AQ.2 [REP1-151]. It is noted that the Greater London Authority's LIR agrees with this position (see the GLA's response to AQ.2 [REP1-029]).</p>
<p>Principal issues part 1, page 1</p>	<p>WR.CBT.2</p>	<p>This concern is increased given the recent research showing that the tests on which current regulations rely "have found higher levels of nitrogen oxide (NOx) emissions in test track and real world driving conditions than in the laboratory for all manufacturers'</p>	<p>The issue relating to vehicle not performing in the real world has been known for some time and is taken into account in the air quality assessment carried out for the Scheme.</p> <p>The Air Quality assessment [AS-022] acknowledges that utilising the emission factors as published by Defra could result in</p>

		<p>vehicles”. (Editors note - DfT Vehicle Emissions Testing Programme (April 2016)). The NPPF section 120 sets out a requirement to take into account “the effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution”. It is hard to see how the applicant can have taken the cumulative effects of pollution into account given these levels have been systematically underestimated by the current vehicle testing regime.</p>	<p>the assessment being too optimistic. The modelled results as part of the Scheme assessment have therefore been uplifted to account for vehicle performance in the real world. This was done following the procedure set out in Highways England’s guidance in IAN 170/12v3. This guidance allows for the under-performance of vehicle emissions in the real world - particularly light duty diesel vehicles (cars and vans), which has led to concentrations not falling as quickly as expected - being corrected in the air quality modelling. This is undertaken by uplifting the modelled concentrations utilising the Defra published modelling tools against projections in IAN 170/12v3 that were generated assuming that the only vehicles that would generate a benefit in emissions were Euro 6/VI. In building the guidance there was also an allowance that Euro VI/6 vehicles would not perform as projected in the Emission Factor Toolkit. Therefore it is considered that the modelled concentrations presented by the applicant do not represent a systematic underestimation of pollution levels.</p>
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<p>Principal issues part 1, page 2</p>	<p>WR.CBT.3</p>	<p>The 2 November 2016 judgement in the High Court Judgement on the case brought by ClientEarth against DEFRA on the adequacy of the Government’s Air Quality Plan3 has further significant implications for transport infrastructure and operation which are not yet fully understood. Given the concerns expressed by Mr Justice Garnham about the adequacy of current air quality modelling, we believe that Transport for London should be directed to halt this application until a legally acceptable air quality model is developed and applied to the Silvertown proposals. We note the Rule 17 letter on this subject and await the responses with interest: however, we are not persuaded that any current model can, by definition, have taken into account this very recent ruling.</p>	<p>The applicant has provided a full response to the issue relating to the High Court Judgement as part of the Request for Further Information (Rule 17) [REP1-093]. To summarise this response, it is important that it is reiterated that the air quality assessment for the Scheme is not based solely on the Defra emission factors within the Emission Factor Toolkit.</p> <p>As stated above, modelled concentrations have been adjusted in line with IAN 170/12v3 to make them more pessimistic than the Defra emissions projections.</p> <p>In addition, it is the Applicant’s view that the judgement provides further justification for the proposed approach in relation to the flexibility in setting the user charge prior to the Scheme opening. The Applicant has committed to re-running the air quality assessment prior to the Scheme opening utilising the latest evidence at that time, which would include the pre-scheme air quality monitoring, latest vehicle emissions information and consideration of future Defra AQPs, to ensure that the scheme would not lead to a significant impact on air</p>
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			quality or delay compliance with the directive.
Principal issues part 1, page 2	WR.CBT.4	The ClientEarth judgement has further possible implications which should cause this application to be reconsidered: the impact of a more comprehensive Ultra Low Emission Zone; the potential for anticipated new legislation to restrict the most polluting vehicles; the potential for anticipated changes in the tax regime to encourage the scrapping of older vehicles. While such new policies may seek to reduce the overall levels of air pollution from vehicles, they are also likely to result in a reduction of vehicle numbers. This in turn would improve the resilience of the existing Blackwall Tunnel as well as its air pollution impacts, reducing the need for an additional road crossing at Silvertown, and bringing into question one of the fundamental assumptions supporting the application.	<p>In accordance with WebTAG guidance, the Applicant has incorporated into its Reference Case and Assessed Case the schemes and developments which are relevant and committed. The Applicant considers that the scenarios set out in the Traffic Forecasting Report [APP-105] including low and high growth scenarios collectively demonstrate that the Scheme would achieve its objectives across the range of plausibly foreseeable scenarios. The Applicant set out its considerations in relation to the High Court judgment of 2 November 2016 in its response to the Examining Authority’s Rule 17 request of 9 October 2016.</p> <p>CBT has not provided any evidence to support its assertion that the ClientEarth judgement is likely to result in a reduction of vehicle numbers.</p>
Principal issues	WR.CBT.5	It is important to note that relying on a shift to electric vehicles (EVs) is not a complete	The Applicant understands that Defra has been given eight months to update the

<p>part 1, page 2</p>		<p>solution to the problems of air pollution from vehicles, as the braking systems on EVs are significant emitters of toxic particulate matter (PM). Reducing overall traffic levels is likely to be a key element of any response to the High Court judgement, and it would therefore be flying in the face of both the law and emerging policy to approve a major new road in an area already subject to illegal levels of air pollution.</p>	<p>actions plans in response to the court ruling. It is not possible for the Applicant to foresee what these action plans will contain or what emerging policy may be produced in the future. The air quality assessment has demonstrated that the Scheme has a beneficial impact on areas subjected to the poorest air quality. The assessment has also demonstrated that the Scheme complies with the current policy as laid down in the National Networks National Policy Statement NN NPS).</p>
<p>Principle issues part 1, page 2</p>	<p>WR.CBT.6</p>	<p>To achieve the goals of public health policy, safer and more attractive provision for active travel, walking and cycling should be prioritised ahead of promoting a new generation of car-dependency. This application has severe negative impacts on the quality of the public realm at either end of the tunnel, with knock on adverse impacts on walking and cycling. This is contrary to the goals set out in key public policies including the draft national Cycling and Walking Investment Strategy which sets out to “make cycling and walking the natural</p>	<p>See ‘Comments on Borough LIRs and WRs’ Report (sub theme “response to walking and cycling issues”)</p>

		choice for shorter journeys or as part of a longer journey”. (<i>Editors note - Draft Cycling & Walking Investment Strategy (DfT 2016)</i>).	
Principle issues part 7, page 3	WR.CBT.7	We do not believe, on the basis of evidence, that building a relatively short section of trunk road in inner London will make any long term positive contribution to relieving congestion or improving the resilience of the road network. There are many example of the phenomenon of induced traffic cited in our previous submission (<i>Editors note - this was included as an Appx to their WR</i>).	See ‘Comments on Borough LIRs and WRs’ Report (sub theme "Induced demand")
Principle issues part 7, page 3	WR.CBT.8	There is also a risk of displaced traffic on to local roads with adverse impacts on congestion, safety and environmental quality, particularly in the event of tailbacks or tunnel closures. Even if the tunnel is operating as proposed, any additional traffic will go on to join the existing road network, which is already experiencing severe congestion. This is at odds with a range of local and national policies, not least the requirements of the Road Traffic Reduction	See ‘Comments on Borough LIRs and WRs’ Report (sub themes "Traffic displacement and adjacent crossings" and “Induced demand”)

		<p>Act 1997 and the 2011 Sustainable Transport White Paper.</p>	
<p>Principle issues part 7, page 3</p>	<p>WR.CBT.9</p>	<p>We understand the need to tackle congestion. London is the ‘congestion capital of Europe’ according to the annual INRIX congestion report. It found traffic congestion in London had risen noticeably since 2012, with journey times in Central London increasing by 12 per cent annually, although the volume of car traffic continues to fall. TfL’s latest Travel in London report reports a recent fall in journey time reliability, with a 13 per cent increase in average traffic delay since 2013. 11 The TfL Roads Task Force (2013) suggested that there was no one single cause of congestion: “the majority of the current unreliability, 79 per cent of it on the TLRN in a weekday AM peak is accounted by volume of traffic and day-to-day variability in traffic demand.” The INRIX report suggests that the primary cause is temporary loss of capacity through road works and construction traffic, not a permanent,</p>	<p>The Applicant has set out a comprehensive option assessment process in its Case for the Scheme [APP-093], including a comprehensive package of public transport investment combined with user charging at the Blackwall Tunnel. The Case for the Scheme explains that the Applicant’s analysis has demonstrated no alternative approach would effectively address the Project Objectives. The Scheme would directly address the severe unreliability and routine congestion which affect the Blackwall Tunnel.</p>

		structural shortage of road space.	
Principle issues part 7, page 3	WR.CBT.10	Private car use in London has been falling over a number of years, despite the growing population: car use as a share of all trips, has declined from a peak of 50 per cent in 1990 to a current level of 36 per cent, with some analysts suggesting we have reached 'peak car'. This is common trend as cities grow: denser populations can support greater concentration of services, reducing the need for travel, while mass transit is the only viable solution for peak time commuter travel.	See answer above to WR.CBT.9 and WR.CBT4
Principle issues part 7, page 4	WR.CBT.11	The London Plan and national planning policy both prioritise focusing development on brownfield sites and around existing transport hubs in order to maximise the benefits of densification without generating adverse environmental impacts. The NPPF core principles seek to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and "focus significant development	The Applicant's views as to the Scheme's compliance with relevant policies are set out in the Policy section of 'Comments on Borough LIRs and WRs' Report submitted at Deadline 2.

		<p>in locations which are or can be made sustainable”. This is seen in the growth of low-car and car-free housing policies in inner London, breaking the link between the provision of new homes and the provision of car space to match. Infrastructure planning decisions should support this benign trend rather than take a backwards step towards more road capacity.</p>	
<p>Principle issues part 7, page 4</p>	<p>WR.CBT.1 2</p>	<p>We recognise that in London there has been a significant growth in commercial traffic (freight and construction traffic). Light goods vehicles (delivery vans) now make up 13 per cent of all motorised urban traffic. However a policy-compliant solution is not to increase the amount of road space available for freight vehicles, but rather to encourage better use of existing networks through delivery consolidation and modal shift, in line with the latest local (London Plan) and national policy. To quote the most recent DfT freight policy, “The Government has set a stretching and legally binding Fifth Carbon Budget which will see a 57 per cent reduction in emissions in 2032 compared to</p>	<p>In addition to the wide range of schemes it continues to bring forward to support public transport, walking and cycling, TfL has a duty to take steps to ensure the expeditious movement of traffic on London’s roads, including freight. The Applicant’s assessment is that the Scheme would significantly improve the efficiency of highway travel across the river in this part of London without giving rise to an increase in highway travel overall. A response to the matter of environmental impacts arising from freight activity is provided within FWQ Air Quality report [REP1-151], specifically the response under AQ.10.</p>

		<p>1990 levels, on a path towards reducing emissions by 80 per cent by 2050 as set out in the Climate Change Act. Government is committed to ensuring that transport plays a full part in delivering the economy-wide emissions reductions needed to meet this target. Currently domestic transport emissions make up nearly a quarter of total UK domestic greenhouse gas emissions, with road freight a significant contributor – in 2014 HGVs were responsible for 17 per cent of total UK transport emissions. Shifting more freight from road to rail therefore has the potential to make a real contribution to meeting the UK’s emissions reduction targets.”</p>	
<p>Principle issues part 7, page 4</p>	<p>WR.CBT.1 3</p>	<p>An approach based on sustainable modes would sit far more comfortably with the NPPF which advocates that “economic, social and environmental gains should be sought jointly and simultaneously through the planning system” as well as the Mayor of London’s transport strategy which aims to “reduce the need to travel, encourage the use of more sustainable, less congesting</p>	<p>The Applicant’s views as to the Scheme’s compliance with relevant policies are set out in the Policy section of ‘Comments on Borough LIRs and WRs’ Report submitted at Deadline 2.</p>

		<p>modes of transport (public transport, cycling, walking and the Blue Ribbon Network), set appropriate parking standards, and through investment in infrastructure, service improvements, promotion of smarter travel initiatives and further demand management measures as appropriate, aim to increase public transport, walking and cycling mode share”. It is difficult to see how the current proposals would meet these requirements.</p>	
<p>Principle issues part 7, page 4</p>	<p>WR.CBT.14</p>	<p>The higher traffic volumes and encouragement of car use arising from new road capacity would be at odds with other key public policy priorities not least carbon reduction. The UK has a binding target of an 80% CO2 emissions reduction by 2050 and reducing transport emissions is key to achieving this. As part of its contribution to the Paris Agreement, which came into effect this month, the UK Government has further committed to doubling the EU’s economy-wide emissions reduction target to at least 40% by 2030. This requires a joined-up policy to encourage strategic modal shift to sustainable modes and reducing the need to</p>	<p>All forecasts indicate that cross-river highway demand in this part of London will rise not fall in absolute terms, bringing with it further congestion. This is despite further anticipated reductions in the proportion of trips made by car and significant investment in alternatives to car travel. This is in line with recent years during which the pressure on the existing crossings has risen despite very substantial investment in cross-river public transport capacity.</p> <p>The London Plan and MTS provide a joined up and comprehensive policy context and this Scheme fits into that by addressing long-</p>

		<p>travel, which is undermined by proposals for major new road capacity such as the Silvertown Tunnel.</p>	<p>standing congestion, reliability and resilience issues in part of London that will undergo significant economic development.</p> <p>Also see ‘Comments on Borough LIRs and WRs’ Report (sub-theme “Induced demand”) The rapidly-developing areas described by CBT are well-connected and becoming more so with rail, so the opportunity is being taken to encourage public transport use more generally, with the Scheme also facilitating the delivery of a number of new and extended cross-river bus routes.</p>
<p>Principle issues part 8, page 4</p>	<p>WR.CBT.1 5</p>	<p>In terms of supporting local economic activity, developing road crossings primarily for private motor vehicles is not the kind of connectivity that is most needed. TfL’s latest annual figures show strong upwards growth in rail and bus use, while car use is falling: “vehicle kilometres in London in 2014 were 9.5 per cent lower than in 2000 and this fall in road demand has been a consistent feature of the last decade. Between 1994 and 2014 there has been a net shift in mode share, at the trip level, of 13 percentage</p>	<p>All forecasts indicate that cross-river highway demand in this part of London will rise not fall in absolute terms, bringing with it further congestion. This is despite further anticipated reductions in the proportion of trips made by car and significant investment in alternatives to car travel. This is in line with recent years during which the pressure on the existing crossings has risen despite very substantial investment in cross-river public transport</p>

		<p>points away from the private car towards public transport, walking and cycling. This shift relates to all travel in London, whether by residents or non-residents.” A sustainable transport approach would be more likely to provide usable connectivity while making the growing residential centres on either side of the river more attractive places, strengthening the local economy.</p>	<p>capacity.</p> <p>The rapidly-developing areas described by CBT are well-connected and becoming more so with rail, so the opportunity is being taken to encourage public transport use more generally, with the Scheme also facilitating the delivery of a number of new and extended cross-river bus routes.</p>
<p>Principle issues part 8, page 5</p>	<p>WR.CBT.1 6</p>	<p>Road-based connections will not provide the kind of regeneration most needed by the communities on either side of the river. As the mapping produced in the consultation shows, new road crossings will bring a significant increase in traffic volumes through these neighbourhoods, adding to noise pollution, air pollution and community severance.</p>	<p>See ‘Comments on Borough LIRs and WRs’ Report (sub theme "Traffic will increase")</p>
<p>Principle issues part 8, page 5</p>	<p>WR.CBT.1 7</p>	<p>One aim of the proposed Silvertown Tunnel is to assist access to employment. Road-based crossings will reinforce patterns of exclusion from work for those who do not have cars or do not drive particularly young</p>	<p>Buses are the single most important mode for those on low incomes or unemployed, and the Scheme facilitates the delivery of a number of new and extended cross-river routes, which will result in a step-change in</p>

		<p>people and the long-term unemployed. Research we conducted with the DfT found that encouraging sustainable travel helps increase the pool of labour for companies by increasing employers' access to non-car users in the workforce, leading to real benefits for employers, employees and the wider economy.</p>	<p>cross-river bus connectivity.</p>
<p>Principle issues part 8, page 5</p>	<p>WR.CBT.1 8</p>	<p>There has been a significant increase in the amount of construction activity in east London and this has contributed to both current congestion and calls for future increases in road capacity. However it is important to note that the bulk of major construction projects that are due to take place in the areas served by the Silvertown Tunnel (including Crossharbour/Isle of Dogs regeneration, the Olympic Park, Crossrail, Canning Town, Silvertown, Custom House and Albert Docks regeneration to the north of the river and the redevelopment of north Greenwich, Greenwich Town Centre, and Deptford Creek to the south), are already completed, or will be largely completed before the proposed tunnel comes on</p>	<p>See 'Comments on Borough LIRs and WRs' Report (sub theme "Construction traffic – cumulative impacts")</p>

		<p>stream in 2023. Far from easing such building and regeneration projects, the impact of the congestion works for the proposed tunnel is likely to prolong disruption after these projects have been completed, continuing the adverse impact of building works on the surrounding communities, and delaying any benefit from these regeneration schemes.</p>	
<p>Principle issues part 9, page 5</p>	<p>WR.CBT.19</p>	<p>In our earlier submission (<i>Editors note - included with submission as an appx</i>) we noted that London’s population growth does not result in equivalent traffic growth, and this needs to be factored into the modelling. In addition, further challenges to conventional modelling arise from the recent ClientEarth court case: the Department for Transport’s current review into how Web TAG handles social and economic impacts: and recent studies criticising how the value of time is treated in modelling, with evidence that regular travellers will simply extend their travel area as travel time reduces rather than seek less time in transit.</p>	<p>See ‘Comments on Borough LIRs and WRs’ Report (Sub themes "VOT/Charging elasticity" and "Induced demand")</p>

<p>Principle issues part 9, page 5-6</p>	<p>WR.CBT.20</p>	<p>We believe that there are a range of approaches to improve resilience at the existing Blackwall Tunnel and/or provide other options for crossing the Thames, which need to be fully explored before considering a new Silvertown Tunnel. These could include:</p> <ul style="list-style-type: none"> • smart queueing and other demand management approaches • new cross-river rail and/or light rail links, including proposed DLR and Overground cross-river extensions • new cycling and walking crossings, including the proposed Rotherhithe bascule bridge • investment in environmental and design improvements to existing roads to reduce air pollution and improve safety improving provision of sustainable modes on the existing road network, encouraging modal shift and making better use of capacity • investment in wharf capacity along the Thames to maximise water-based movement of freight • joining up with other initiatives to shift 	<p>The Applicant has set out in Chapter 3 of its Case for the Scheme [APP-093] the extensive option assessment process which it has undertaken to identify the Silvertown Tunnel as its preferred Scheme. This included consideration of a comprehensive package of public transport investment plus the application of user charges. This assessment found that no alternative could meet the Project Objectives as effectively as the preferred Scheme.</p>
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		<p>distance freight to rail and manage on-road delivery times</p> <ul style="list-style-type: none"> • exploring a wider approach to demand management including road user charging / congestion charging not exclusively at new crossings. 	
<p>Principle issues part 9, page 6</p>	<p>WR.CBT.2 1</p>	<p>We welcome the recent announcements focusing on extending the DLR and the London Overground rather than developing additional road crossings at Gallions and Belvedere. Providing new light-rail links across the river, with the option of parallel walking and cycling routes, would provide real regeneration benefits through direct connections from emerging neighbourhoods to London’s employment centres that would be available to all. We do not believe this approach has been fully explored at Silvertown.</p>	<p>As demonstrated in the Case for the Scheme [APP-093] at paragraphs 3.3.16 – 3.3.39 and Appendix A, the Applicant did explore a number of sustainable mode only options to address the issues at the Blackwall Tunnel. This work demonstrates that although many of the public transport, walk and cycle schemes may have some merits, they are not sufficient in themselves to fully address the problems at the Blackwall Tunnel. For example, due to a fixed public transport crossing e.g. in form of a DLR or rail connection only serving small proportion of trips, the potential to generate sufficient mode shift to alleviate the problem of congestion at the Blackwall Tunnel is limited. Furthermore, public transport and walk and cycle links do not provide a viable alternative diversion route in case of incidents or closures and</p>

			therefore does not provide short- or long term resilience.
Principle issues part 9, page 6	WR.CBT.2 2	There is a great missed opportunity to provide more and better cycling capacity. The proposal for a bus shuttle service for cyclists and their bicycles is a thin gloss on what is effectively a new trunk road. The precedents are not happy. The similar shuttle service at Dartford is poorly publicised, poorly served and poorly used.	<p>The reasons for not providing a pedestrian and cycle link through the Silvertown Tunnel are clearly set out in paragraphs 3.3.19, 3.3.22 and 5.7.9 and summarised in the table on page 192 in the Case for the Scheme [APP-093]. The provision of a cycle (and pedestrian) link through the Silvertown Tunnel would be expensive and would be likely to be an unattractive environment for users, particularly in relation to traffic noise.</p> <p>As discussed in response to FWQ PN.6 [REP1-178], the Applicant will be undertaking further investigations into the potential shuttle service, including potential demand and how the service could operate, with consideration given to other relevant cycle shuttle services.</p>
Principle issues part 9, page 6	WR.CBT.2 3	We are not satisfied that full consideration has been given to maximising use of the Emirates cable car. This existing infrastructure has potential to meet many of	The Emirates Air Line provides an important cross-river link, following a similar alignment to the Silvertown Tunnel, however, given that it would have very little impact on demand for

		<p>the needs for local transport of people and light goods better than a new road tunnel. This would make better use of the significant capital investment already made in what is currently a woefully underused piece of infrastructure on a parallel route to the proposed Silvertown Tunnel. It also has potential to offer cyclists a route across the river that is at least as attractive as the bus shuttle proposed for the Silvertown Tunnel.</p>	<p>the Blackwall Tunnel nor provide any resilience in the event of closures, it is not a viable alternative to the Scheme. This is set out on Page 182 of the Case for the Scheme [APP-093].</p>
<p>Principle issues part 9, page 6</p>	<p>WR.CBT.2 4</p>	<p>We are not satisfied that full consideration has been given to either a bus-only tunnel or to improved provision of bus routes through the existing Blackwall Tunnel, which can easily accommodate single decker buses. The recent introduction of a new Hopper bus fare (allowing TfL bus passengers to switch buses to complete their journey for a single fare rather than being charged separately for each bus used) allows dramatic reconfiguration of bus routes, for example with a dedicated shuttle through the Blackwall Tunnel, which would not have been an option at the time the Silvertown Planning application was submitted. The</p>	<p>See the Case for the Scheme section 2.10 (pages 67-72) for a description of how the problems of the Blackwall Tunnel adversely affect the 108 and other bus routes in the area. While the Scheme will improve journey times in the Blackwall Tunnel, it will not allow for the introduction of double-decker buses within the Blackwall Tunnel, which therefore acts as a constraint on capacity. A bus-only tunnel would not meet the needs of users with other types of vehicle, for example freight cannot be shifted to buses. While the introduction of the Hopper fare will provide a further encouragement for people to travel by bus, the key concerns around the provision of</p>

		recent growth in bus usage resulting also changes the assumptions on both the demand for such bus routes and the consequent reduction in car travel as buses become a more attractive option.	additional services through the Blackwall Tunnel are around the practicality of operating services in highly congested and unreliable conditions.
Principle issues part 9, page 6	WR.CBT.2 5	There is also great potential to reduce demand for road capacity through extending the MiniHolland approach to the boroughs to be served by the tunnel. In Waltham Forest, traffic levels in 12 key roads in the “village” area of Walthamstow fell by 56 per cent, or 10,000 fewer vehicles a day, following the introduction of strategic road closures, combined with improved walking and cycling provision. If such an approach were implemented in neighbourhoods around north and east Greenwich, north Woolwich, Silvertown and Canning Town, assuming similar impacts, this would significantly reduce demand for new capacity at the Silvertown Tunnel crossing point.	The Applicant does not consider that there is substantial scope to reduce demand for travel at the Blackwall Tunnel through encouragement of walking and cycling. As set out in the Transport Assessment [APP-086], trips through the Blackwall Tunnel are generally relatively long and unlikely to be able to transfer to active modes in this way.
Principle issues	WR.CBT.2 6	We also believe that there is potential to explore the introduction of a Workplace	The Applicant has set out a comprehensive process of option assessment in the Case for

<p>part 9, page 6-7</p>		<p>parking levy. This approach has already been implemented successfully by the city of Nottingham using powers under the 2000 Transport Act, and has shown a range of benefits including reduced traffic levels, investment in public transport, and early achievement of the city’s carbon reduction targets, combined with growth in homes and jobs. Piloting such a scheme in the Canary Wharf/Isle of Dogs central business district for example, could help manage demand on existing road-based river crossings while providing additional benefits in terms of air pollution, carbon reduction and better use of valuable employment land.</p>	<p>the Scheme [APP-093]. This demonstrates that demand management measures alone would not be capable of addressing the project objectives because they would not increase the resilience of the road network which is a key objective of the Scheme.</p>
<p>Principle issues part 10, page 7</p>	<p>WR.CBT.2 7</p>	<p>The issue of user charging is a key test for the viability of this project and the extent to which it can deliver its promises. It is notable that organisations that support the principle of the Tunnel, including London Borough of Newham and the Federation of Small Businesses, are opposed to a user charge being levied. Yet the applicant asserts – and we agree – that a charge is essential both to fund the project and to manage demand. It</p>	<p>The Scheme will result in significant benefits for businesses. Although under the Assessed Case charging schedule businesses would be required to pay a charge to use the Blackwall and Silvertown crossings, the monetary value of the time savings they get back in return are much larger. 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</p>

		<p>is unclear whether in practice the added operational costs imposed by such a user charge on local businesses would compensate for the proposed gain in travel time from congestion relief. Given the experience of other schemes – notable Dartford – where any congestion relief is temporary but the user charges are permanent; this would seem to be an insuperable problem for the applicants to overcome.</p>	<p>charging costs have been taken into account, including reliability benefits.</p>
<p>Principle issues part 10, page 7</p>	<p>WR.CBT.2 8</p>	<p>We believe that further work needs to be done, as part of any further modelling required in response to the concerns raised by us and by others on the current modelling, on the appropriate level of user charge in tandem with the proposed ULEZ and supplementary congestion charge (t-charge) for the most polluting vehicles; with any proposed fiscal changes around fuel prices and/or Vehicle Excise Duty in the light of the ClientEarth court case; and the implications for demand from other new policy initiatives, including changes to other proposed river crossings announced by</p>	<p>For ULEZ and 't-charge', see Report 'Comments on Borough LIRs and WRs' response to Emissions-based charges.</p> <p>As set out in Charging Policies and Procedures [REP1-123] paragraph 4.1.2, TfL will re-run the strategic traffic model prior to setting the initial user charges. Any relevant changes would be included at that stage. It is not appropriate to model unconfirmed or possible changes at this stage.</p>

		<p>Transport for London at the start of this Inquiry.</p>	
<p>Principle issues part 10, page 7</p>	<p>WR.CBT.30</p>	<p>We understand the calls from local communities to offer concessions for local users. The proposal to have tolls on the crossings – which we agree would be essential for demand management as well as funding – would increase the tendency for these to be primarily through routes for commercial traffic, with little or no local benefit. However we believe there is an overwhelming environmental case – and a policy case to meet legal requirements on carbon reduction and air quality – to apply the user charge equally to all vehicles within a use class, with local and distance traffic treated the same. Any exemptions should be on the basis of vehicle fuel type and emissions, in line with the current congestion charge and emerging ULEZ charging regimes, with overall user charges set at a level that manages down demand in an area which already has more than its fair share of traffic, noise and pollution.</p>	<p>See ‘Comments on Borough LIRs and WRs’ Report (sub theme “Resident discount”)</p>

<p>Comment in regard ExA written question GA2, page 7</p>	<p>WR.CBT.3 1</p>	<p>We believe that this application should be considered in the context of the London Plan and NPPF, rather than the National Networks NPS. The application site falls fully within the London Plan area, and is being promoted by Transport for London and the Mayor of London under the same devolved powers. It would be inappropriate to consider this out of the London context by reference to the NNPNS.</p>	<p>See also: Response FWQ.GA.2 and Planning Policy Compliance Statement Section 3</p> <p>The applicant considers that, as a matter of law, the application must be decided in accordance with the National Networks NPS (NPSNN) under s. 104 of the PA 2008 unless the Secretary of State is satisfied that any of the exceptions in subsections (4) to (8) apply.</p> <p>Paragraph 1.3 of the NPSNN provides that applications which are the subject of a section 35 Planning Act 2008 direction need to be considered in accordance with the policy guidance in the NPSNN, although the relevant development plan is also likely to be an important and relevant matter for the purposes of Section 104 of the Planning Act 2008, especially in establishing the need for the development.</p> <p>This is explained at paragraph 3.27 of the NPS, which states:</p> <p><i>“Where tolls or road user charges are</i></p>
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			<p><i>proposed as part of a highways project that is the subject of a direction given under Section 35 of the Planning Act 2008, the Government will expect the applicant to demonstrate that the proposals are consistent with this NPS, the relevant development plan and relevant statutory transport strategies and plans.”</i></p> <p>The relevant development plan documents in this case directly and strongly support the Scheme. In particular:</p> <ul style="list-style-type: none"> • the Scheme is directly supported by name in the London Plan as part of a strategy for additional road-based river crossings in East London; • the Scheme is directly supported and safeguarded in up to date statutory development plans for each of the London Boroughs of Greenwich, Tower Hamlets and Newham; and • the Scheme is directly supported in supplementary planning documents including, particularly, the opportunity Area Planning Framework for the Lower Lea Valley and the emerging planning frameworks for the City in the East.
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			<p>Not only do these documents identify and support the Scheme, they explain their support by reference to the critical need to increase capacity and to support growth and regeneration.</p>
<p>Comments in regard ExA written questions AQ1, AQ2, AQ9, AQ16</p>	<p>WR.CBT.3 2</p>	<p>We believe that the 2021 baseline is not sufficient given that 2023 is the operational start of the scheme and that the applicant must aim to ensure that the scheme is air-quality neutral in line with both the London Plan and the wider requirements for significant intervention to meet legally binding air quality requirements, currently breached in London. We are not satisfied that the current proposals are appropriately assessed nor appropriately mitigated as a) we have an uncertain baseline given the real world driving emissions compared to lab tests and b) the proposed increase in overall traffic levels, leading to an inevitable increase in roadside emissions.</p>	<p>The applicant has provided a full response regarding the use of 2021 as a baseline year in its response to the First Written Question AQ.1 [REP1-151]. In summary, the applicant considers that use of 2021 as a proxy for 2023 is conservative as the air quality modelling tools and guidance indicate that use of 2021 will result in higher modelled pollutant concentrations (than 2023). The applicant therefore believes that the use of 2021 is a conservative and robust approach.</p> <p>In relation to the air quality neutral policy, a full response regarding this matter is given in the Applicant’s response to First Written Question AQ.2 [REP1-151]. The Applicant has not provided an Air Quality Neutral assessment because the guidance makes clear that it is not appropriate to apply such an assessment to a road scheme. This is clear in paragraph 2.9 (page 5) of Air Quality</p>

			<p>Neutral Planning Support Update: GLA 80371 April 2014, which states that:</p> <p><i>‘Major transport infrastructure development, such as that proposed by TfL, is assessed using the Transport Advisory Guidance (TAG) methodology, which estimates changes to NOx and PM emissions, and then applies an economic valuation. It is therefore suggested that it would be inappropriate to apply the air quality neutral policy to these types of development.’</i></p> <p>As previously stated, the Silvertown Tunnel Scheme results in beneficial air quality impacts, particularly at locations with the highest concentrations (above the AQS Objectives/EU Limit Values). This is based on the more pessimistic assessment than being solely reliant on the Defra emission factors which accounts for the uncertainty in real world emissions and has concluded that the Scheme impacts are not Significant.</p>
<p>Comment in</p>	<p>WR.CBT.3</p>	<p>We note the apparent contradiction between</p>	<p>There is no contradiction between levying a</p>

<p>regard ExA written question SE3</p>	<p>3</p>	<p>levying a user charge and stimulating economic growth. We support a user charge on the basis of managing demand for environmental reasons as part of a wider sustainable transport policy, not only to cover construction and maintenance costs. However we agree with the Inspector that it is unclear whether in practice the added operational costs imposed by such a user charge on local businesses would compensate for the proposed (and probably temporary) gain in travel time from congestion relief. We urge against approving a Tunnel without a user charge given the likely knock on effects on congestion and air pollution from provision without demand management, which would be inherently unsustainable.</p>	<p>user charge and stimulating economic growth if the user benefits are greater than the cost of the user charges for businesses, which is the case for this Scheme. 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 taken into account, including reliability benefits. These benefits will be available to businesses to reinvest, stimulating economic growth.</p>
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3 ASSOCIATION OF BRITISH DRIVERS

3.1 Comments on Written Representation

Table 2 - Key issues identified from Written Representation by Association of British Drivers with TfL’s commentary

Location in Representation	TfL Reference	Interested Party’s Comment	TfL Comment
Toll Charges, page 2	WR.ABT.1	Note that we oppose the use of tolls on cross-river crossings as a means to manage traffic flows. Tolls are socially divisive because they affect poorer sections of the community more than others. In London it is also perverse to have some river crossings tolled and not others. The imposition of high tolls might also negatively affect the residents and commercial businesses north and south of the river close to the crossing point - and might for example prejudice the claimed "business	See ‘Comments on Borough LIRs and WRs’ Report (sub theme “In favour of business discount”)

		regeneration" aspects of the proposals.	
Toll Charges, page 2	WR.ABT.2	However, as it seems likely that the funds to develop this project would not be forthcoming without finance from tolls being provided, we would support some tolls - for example at low charge levels and for a limited period of years until the development costs have been paid for.	As set out in the Charging Policies and Procedures [REP1-123], section 2.2, a user charge is essential to achieve the Project Objectives over the long-term through demand management. It is not proposed to discontinue the charges once the Scheme construction costs have been met.
Supporting infrastructure, page 2	WR.ABT.3	One slight concern we have with this project is that the proposals for access routes to the new Silvertown Tunnel and the adjacent Blackwall Tunnel appear to be inadequate in relation to the likely traffic flows. It would seem that the lack of development of those routes may be an attempt to manage the traffic flows through the tunnels, but this may have a negative impact in those areas north and south of the crossing in terms of additional traffic congestion over a wider area. We would prefer to see an improved supporting road network infrastructure as part of this project. But if that is not	As set out in the Case for the Scheme [APP-093], the Silvertown Tunnel Scheme is intended to address the severe issues of congestion, closures and a lack of network resilience at the Blackwall Tunnel, one of London's most strategically important highway river crossings. As part of the Road Modernisation Plan, TfL is investing more than £4bn to improve London's roads, including hundreds of projects to transform junctions, bridges, tunnels and public spaces.

		achievable we would still support the proposals for development of this project.	
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4 MOTORCYCLE ACTION GROUP

4.1 Comments on Written Representation

Table 3 - Key issues identified from Written Representation by Motorcycle Action Group with TfL’s commentary

Location in Representation	TfL Reference	Interested Party’s Comment	TfL Comment
Page 1	WR.MAG.1	MAG proposes that Powered Two Wheelers (PTWs) - specifically, motorcycles and scooters - are exempt from user charging in the Silvertown tunnel scheme, as are other modes that help reduce emissions and congestion-related problems. Specifically, we suggest this is done by applying a 100% discount for powered two wheelers, as with other vehicles which are being allowed uncharged usage of the tunnel	The principal objective of the user charge is to manage demand for the Scheme and to help to pay for the Scheme. Motorcyclists will benefit from the increased resilience and the journey time improvements brought about by the Scheme and so it is fair that they like other users should pay for these. In the Assessed Case, Powered Two Wheelers (PTWs) are charged at a lower rate than other vehicles, reflecting their relatively smaller contribution to congestion, road wear and tear and emissions. Nevertheless, motorcycles do contribute to all these areas and it is

			therefore appropriate that the user charges reflect this.
Paragraph 2, page 1	WR.MAG.3	<p>If new charges for powered two wheeler use are introduced, especially on such a key route as a river crossing, a proportion of individuals who would have used small, efficient and cheap motorcycles and scooters for reasons of financial economy are likely to add new demands on the already overloaded public transport alternatives.</p> <p>Exemption from charges for these vehicles duly reflects their role as a more sustainable mode of commuting transport than cars or vans. This is especially important for those with lower than average disposable income. It is also attractive because it enables more modal shift from cars and vans to powered two wheelers, which helps to reduce pressure on oversubscribed parts of the transport network</p>	<p>A key reason to charge vehicles for use of the tunnel is to manage demand, and if a consequence of the charge is to encourage motorcyclists to use more sustainable modes of transport (e.g. public transport) as the Motorcycle Action Group contends then the Applicant considers this a broadly positive outcome. There is also a need to avoid encouraging those currently walking, cycling, or using public transport to switch to motorcycling. With the Scheme enabling the provision of a number of new cross-river bus routes, the opening of the Elizabeth line (Crossrail) in 2018 plus the other substantial investment made in cross-river public transport provision over recent years it means there are a number of options for motorcyclists to switch to more sustainable modes.</p>

<p>Paragraph 3, pages 1-2</p>	<p>WR.MAG.4</p>	<p>Motorcycles and scooters fulfil the same criteria as other vehicles which are to be allowed free use of the tunnel. Every single one of these points also applies to motorcycles and scooters, which play an important role in sustainable transport. Bikes and scooters are a net reducer of congestion, pollution, fuel consumption and journey times. They are on average far cheaper than rail or private car use and require no subsidies. They can also contribute to a further fall in car mode share. They improve journey times and journey time reliability, with riders experiencing significantly reduced travel duration, without contributing to the burden on the road network. If the discount policy is to be applied to ‘compliment this approach’ then it is clear that powered two wheelers should be included in the discount category.</p>	<p>While the Motorcycle Action Group asserts benefits of PTWs (e.g., that they are a “net reducer of congestion, pollution, fuel consumption and journey times”) several times in its response, and the Applicant has considered the case it puts forward, the Applicant nonetheless notes that the <i>lower</i> impacts on congestion and emissions (both in use and life-cycle) described are relative to the use of private motor cars, and not relative to the substantially more sustainable options such as using public transport (which as described above, the Scheme directly facilitates). The Applicant notes that despite their smaller size and reduced impact on queue lengths, PTW vehicles still take up road space – at junctions when other vehicles must naturally give them safe berth, and when moving at general road speed. Finally, it is important to recognise that the maximum occupancy of a typical motorcycle is two passengers – compared to four or five for a standard car.</p> <p>Meanwhile, riders of these vehicles will also</p>
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			<p>benefit from the Scheme in the same ways as others. The Applicant therefore considers that it is appropriate that motorcycle riders should pay a charge like other users of the road – albeit at a lower level than other vehicles reflecting their somewhat lower contribution to congestion. It is also worth noting note that the cleanest of the PTWs will be entitled to a discount to encourage the use of the most environmentally friendly vehicles.</p>
<p>Paragraph 3, page 2</p>	<p>WR.MAG.5</p>	<p>Note also the relevance of the point regarding ‘an important social function.’ The charges will act as a regressive tax for those who have chosen powered two wheelers as a result of being relatively low earners. Such a regressive tax is entirely counter to the stated social agenda of the current Mayor of London – who himself has made commitments in writing in support of powered two wheelers as a vital element in the modal mix of vehicles.</p>	<p>See WR.MAG.4. The Applicant notes that no evidence has been presented to support the statement regarding vehicle choice, but also notes that in any case there are highly cost effective alternatives available for many journeys in the form of public transport (which the Scheme will directly facilitate) – indeed the Scheme as proposed would deliver substantial benefits to those on lower incomes for this reason.</p>

<p>Paragraph 4, page 3</p>	<p>WR.MAG.7</p>	<p>Evidence from TfL's Study: Evaluation of Journey Times and Emissions of PTWs in Bus Lanes (January 2011) (4) clearly shows that powered two wheelers are, on average, far preferable to four wheelers in terms of impact on the environment, fuel consumption and journey times – and as such are evidently low emissions vehicles. A modal shift towards powered two wheelers from all types of twin tracked vehicles such as cars and vans will improve air quality in London, and that is an immensely attractive benefit.</p>	<p>See WR.MAG.4</p>
<p>Paragraph 4, page 3</p>	<p>WR.MAG.8</p>	<p>In addition, they demonstrably reduce congestion as opposed to contributing to it. By contrast, even electric cars contribute to congestion, and therefore are a contributory cause of emissions generated by others which are stationary in the same congestion. It is therefore inconsistent to charge motorcycles which don't cause traffic problems (and in fact reduce them), while not charging other vehicles which add to the congestion, regardless of their</p>	<p>See WR.MAG.1 and WR.MAG.4</p>

		power source.	
Page 4	WR.MAG.9	<p>One further observation should be made at this point: when a ‘cradle to grave’ analysis is conducted, motorcycles further demonstrate savings. This is due to the comparatively modest environmental footprint of a motorcycle production process compared to that of cars or vans and including electric cars. It has been suggested that the footprint of a car is greater in terms of its production and disposal than it is in terms of its emissions when operating as a functioning vehicle. As a rough guide, motorcycles weigh approximately one sixth to one tenth of a typical commuter car. Reports conclude that they have one sixth or less of the production footprint of a car. MAG is happy to supply detailed analysis of these claims on request.</p>	<p>Irrespective of the life-cycle benefits that may come from PTWs, as these vehicles still contribute to congestion, road wear and tear and emissions and will benefit from the reduced congestion and improved reliability delivered by the Scheme, the Applicant therefore considers it appropriate that drivers of these vehicles should pay a charge.</p>
Page 4	WR.MAG.10	<p>Motorbikes also have a longer life expectancy than most twin tracked</p>	<p>The suggestion that motorcycles should be compared with the environmental</p>

		<p>vehicles, further reducing their life time footprint. If the project is solely concerned with the local emissions agenda, then it may choose to ignore this strategic point. However, it is self-evident that only a proper cradle to grave analysis and approach will adequately address the interests of the country and the world in environmental terms. MAG therefore suggests that this point should be regarded as salient in the overall assessment of user charging in the context of motorcycles and scooters</p>	<p>performance for cars or other four wheeled vehicles ignores the important consideration of their performance in comparison with public transport.</p> <p>See also response to WR.MAG.9.</p>
<p>Page 4</p>	<p>WR.MAG.11</p>	<p>Once again, powered two wheelers are more effective at achieving the goal of reduced congestion than any other powered device. This is the case for conventionally powered bikes as well as electric motorcycles and scooters. In terms of emissions, Transport for London's own research (Emissions Study, 2011) proves this is true for PTWs versus, for example, cars.</p> <p>This research was conducted with police motorcycles which have a much larger</p>	<p>See WR.MAG.1 and WR.MAG.4</p>

		<p>physical presence than the average commuter powered two wheeler. Thus, again, from TfL's own research and findings, the stated Project Objectives are supported by motorcycles and scooters, to the point that the more of these there are, the more the traffic problem is reduced. To charge motorcycles and scooters for use of the tunnel is thus actually counterproductive. Indeed, MAG believes that such charging may be legally challenged as discrimination.</p>	
<p>Page 5</p>	<p>WR.MAG.12</p>	<p>Regardless of the future of ULEZ, it makes no sense to introduce charging on one crossing, when the precedents have been clearly and consistently set NOT to charge powered two wheelers on all the other crossings and in the Congestion Charging zone. To do otherwise would be to ignore the sound reasons for that policy and arrangements that have been successfully operated for many years. The proposers of charging would need to show why motorbikes should be charged at</p>	<p>While motorcycles are not currently required to pay the central London congestion charge or a charge at Dartford, there are other examples where they do pay – such as the M6 toll (which the Motorcycle Action Group acknowledge later in its response) as well as numerous international examples.</p> <p>Irrespective of the approach to the charging PTWs taken by other schemes, it is worth noting that each charging scheme will be designed to meet the particular scheme</p>

		Silvertown despite all previous precedents.	objectives and to suit the operation of the specific scheme. The Applicant therefore considers that the notion of precedents is not the only consideration to be taken into account.
Page 5	WR.MAG.14	The proposers of the charging scheme raised the example of user charging on the M6 Toll. MAG has investigated this example. It is true that motorcycles pay a charge to use this toll road while the existing M6 is free to motorcycles (as it is for all normal traffic). Powered two wheelers represent close to 0% of traffic on the M6 toll at any time of day or night. The M6 Toll example therefore strongly support the claims by MAG about the likely displacement of virtually all powered two wheeler traffic to nearby alternative routes if any sort of charge is introduced for motorcycles and scooters. Such displacement serves no useful purpose from any perspective in terms of the Project Objectives – and especially given that one key objective is to reduce traffic flows in the Blackwall Tunnel. The M6	It is not clear from the evidence presented that the current proportion of traffic on the M6 toll road which is made up by motorcycles reflects the impact of charging on these vehicles. See WR.MAG.12.

		experience shows that motorcyclists are unlikely to use the Silvertown crossing if charged to do so, thereby contradicting this goal.	
Page 5	WR.MAG.15	Transport for London’s own research and findings clearly show that thanks to the efficiency with which powered two wheeler users are able to move through congested traffic, including the use of bus lanes on all TfL Controlled routes since 2009, the emissions of all categories of pollutants are significantly lower than for cars and vans.	See WR.MAG.4
Page 6	WR.MAG.17	There could be other adverse consequences – such as forcing the authorities to charge electric vehicles as they create as much congestion as fossil fuelled vehicles.	The Applicant is not clear what is precisely meant by this statement however, as stated earlier, each scheme’s charging policies will be designed to meet the objectives of the individual scheme. Furthermore, the Applicant does not consider that there is a risk that it’s proposed approach to charging would lead to a precedent of being forced to apply a charge to electric vehicles.

5 BAZALGETTE TUNNEL LIMITED

5.1 Comments on Written Representation

Table 4 - Key issues identified from Written Representation by Bazalgette Tunnel Limited with TfL’s commentary

Location in Representation	TfL Reference	Interested Party’s Comment	TfL Comment
Page 1 of the letter	WR.BT.1	<p>The Tideway project commenced construction in 2016 and construction works will take place up to 2022. Whilst not in the immediate vicinity of the Tideway project, construction of the Silvertown Tunnel has the potential to impact on Tideway’s logistics, and therefore the safe and timely delivery of the Thames Tideway Tunnel.</p> <p>The delivery of the Tideway project is reliant on river transport and is using the river past the Silvertown Tunnel scheme. The River Transport Strategy, (document, APP 207.02) for the Thames Tideway Tunnel</p>	<p>The Applicant is aware of the proposed use of the River Thames at planning stage by the TTT project, and during delivery by Bazalgette Ltd, for transportation of construction materials and excavated materials.</p> <p>In a similar manner to the Tideway project, the Applicant also wishes to use the River Thames as a transport route in order to reduce the quantity of materials generated or required for construction of the Silvertown Scheme, to be transported on the local road</p>

	<p>scheme summarises the key commitments by the Undertaker to the transport of materials by river. In addition to these commitments the project is intending to transport more construction materials by river to further reduce the impacts from construction vehicles in central London. The Tideway river use programme overlaps with the indicative programmes for the Silvertown project including the jetty construction and potential dredging. This is the subject of the Planning Inspectorate First Written Question DN 2.</p> <p>As a key river user, Tideway wish to ensure that: the river works and transport requirements for the Silvertown Tunnel scheme do not to interfere with the existing river navigations, short term restrictions are minimised, and appropriate controls on works approval by the Port of London Authority are maintained. It is vital that Transport for London takes the existing and planned river transport into account when looking at cumulative effects on navigation, particularly any impacts that could cause the loss of the use of the river for transporting</p>	<p>network.</p> <p>The use of the river (including use by marine equipment for construction of both the Tideway and Silvertown projects) is controlled by the PLA. In TfL’s extensive engagement with the PLA, the need for a Navigational Interest Risk Assessment has been identified as a mechanism by which PLA can ensure risks of marine use on the river arising from this Scheme, in light of the plans of the Tideway Tunnel are adequately controlled.</p> <p>Whilst usually prepared and submitted to PLA closer to commencing river use, TfL have prepared a draft of this document, known as the 'Navigation Issues and Preliminary Risk Assessment ('NIPRA') [APP-054] and submitted this with the DCO application to reflect the preliminary design stage, having discussed its contents with the PLA.</p> <p>Together the NIPRA, the dDCO and specifically the Protective Provisions for the benefit of PLA, address the need to maintain operation of all navigable interests in the</p>
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		materials for the Tideway project.	<p>Thames.</p> <p>The Applicant confirms that a Passage Plan, which will include an updated navigational risk assessment, itself used to manage navigational risk matters, including the way in which river users transport materials, will be prepared by the Contractor and approved by the PLA, pursuant to the CoCP. The Passage Plan will establish cycle times for loading, unloading and journeys for vessels. This will be agreed with the PLA to ensure that all river users can be accommodated and co-ordinated.</p>
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6 BRITISH LAND (KING & WOOD)

6.1 Comments on Written Representation

Table 5 - Key issues identified from Written Representation by British Land (King & Wood) with TfL’s commentary

Location in Representation	TfL Reference	Interested Party’s Comment	TfL Comment
Page 2, paragraphs 4.2 to 4.6	WR.BL.1	<p>The principles of the Monitoring Strategy (Document Reference 7.7) and the establishment of the Silvertown Tunnel Implementation Group (STIG) are, in our view, sensible and broadly acceptable.</p> <p>4.6. However, bearing in mind the uncertainties around actual outcomes, BL CW Holdings Limited is keen to ensure that the monitoring and mitigation strategy proposed by the Applicant is clear and robust; that it adequately addresses the need to mitigate</p>	See ‘Comments on Borough LIRs and WRs’ Report (sub themes “Monitoring” and “Mitigation”)

		any adverse impacts arising in the Rotherhithe area; that it provides for effective engagement with all key stakeholders in both the public and private sectors; and that funding for mitigation is fully secured through the DCO.	
Page 3, paragraphs 6.4 to 6.6	WR.BL.2	<p>Network performance at the Rotherhithe Tunnel roundabout and on Jamaica Road is a key influence on conditions in the Rotherhithe area. BL CW Holdings Limited is concerned to ensure that the whole of this corridor is subject to a similar level of rigour within the monitoring regime. In any case, it seems logical that the whole of the corridor between Tower Bridge, the Rotherhithe Tunnel and Greenwich should be monitored on a consistent basis.</p> <p>6.5. BL CW Holdings Limited therefore seeks amendments to the Monitoring Strategy such that the Rotherhithe Tunnel roundabout and Jamaica Road are explicitly</p>	See 'Comments on Borough LIRs and WRs' Report (sub themes "Approach to monitoring is inadequate" and "Suggestions for additions to the Monitoring Plan")

		<p>identified as “other strategic and local routes” on Figure 3.1. Figure A.1 and the tables in Appendix A.1 of the Monitoring Strategy should also be updated to reflect this.</p> <p>6.6 The Applicant has indicated that it intends to update the Monitoring Strategy accordingly and we await confirmation that this includes the changes we are seeking.</p>	
<p>Page 4, paragraphs 7.5</p>	<p>WR.BL.3</p>	<p>BL CW Holdings Limited seeks revision to the Monitoring Strategy, or other appropriate documents, to make clear:</p> <p>a) whether this phase of work prior to Scheme opening would include producing updated models, and for which scenarios; and, if so</p> <p>b) whether the updated modelling work would be presented to the STIG at that time and the extent to which the STIG and its sub-groups or local interest groups would be able to discuss and agree outcomes from that</p>	<p>See ‘Comments on Borough LIRs and WRs’ Report (sub theme “Charge-setting process”)</p>

		work.	
Page 5, paragraphs 8.3 to 8.8	WR.BL.4	<p>However, we are concerned that the ‘Buses’ section of Appendix A.1 of the Monitoring Strategy lacks definition and has insufficient geographical coverage.</p> <p>8.4. The Monitoring Strategy does not define what is meant by “key approaches” to the two tunnels, nor how “relevant sections” of bus routes will be determined. As a minimum, this needs further clarification. Additionally, given that Figure 3.1 of the Monitoring Strategy defines specific “strategic corridors” and “other strategic and local routes” which are clearly of importance, it would seem appropriate that the performance of the bus network on these routes should also be monitored.</p> <p>8.5. BL CW Holdings Limited is particularly concerned to ensure that specific monitoring is undertaken for all bus routes that use the</p>	See ‘Comments on Borough LIRs and WRs’ Report (sub themes “Approach to monitoring is inadequate” and “Suggestions for additions to the Monitoring Plan”)

		<p>Lower Road and Jamaica Road corridors. As noted earlier, we have requested that Jamaica Road is included as an “other strategic and local route”.</p> <p>8.6. Existing conditions in these corridors are poor. Congestion and lack of journey time reliability can result in bus services being delayed or curtailed, affecting bus users within the surrounding communities. We do not wish to see these conditions deteriorate further as a result of the Scheme.</p> <p>8.7. We also anticipate that developers in the Canada Water Opportunity Area will include enhancements to the bus route network and infrastructure in these corridors, to improve bus accessibility to the area. The early phases of delivering an enhanced network will be concurrent with implementation of the Scheme and we do not wish to see these benefits eroded by adverse impacts related to the Scheme.</p>	
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		<p>8.8. We therefore consider that the section on ‘Buses’ in Appendix A.1 should be amended to make specific reference to bus routes on the Lower Road and Jamaica Road corridors, as a minimum.</p>	
<p>Page 6, paragraphs 9.3 and 9.5</p>	<p>WR.BL.5</p>	<p>9.3 The principle of prioritising locations in this way is supported, given that a large amount of data is likely to be collected as part of the monitoring work. However, BL CW Holdings Limited is concerned that the TIMS does not provide any detail of the quantitative criteria (the ‘triggers’) for the RAG classification. Furthermore, it is not clear from the TIMS whether the setting of these triggers would be done solely by the Applicant or would be done in consultation with, and agreed by, the STIG and its sub-groups.</p> <p>9.5 We therefore consider that the TIMS should be updated to provide:</p> <p>a) an initial set of RAG triggers for each of the different metrics identified in the Traffic Monitoring Plan (Appendix A.1 of the Monitoring Strategy), which comprise total</p>	<p>See ‘Comments on Borough LIRs and WRs’ Report (sub theme “Triggers for mitigation”)</p>

		<p>traffic flows, traffic flow composition, volume:capacity ratios, delays at river crossings, vehicle journey times, journey time reliability, junction delay, junction degree of saturation, bus journey time, bus speeds, excess wait time, bus patronage, accidents, pedestrian and cyclist indicators including flows and crossing wait times and changes in travel behaviour;</p> <p>b) the basis on which those triggers have been determined;</p> <p>c) clarification of the basis on which triggers may be reviewed and/or adjusted whether prior to or after Scheme opening; and</p> <p>d) clarification of the responsibilities for setting and reviewing RAG triggers and the degree to which the STIG and its sub-groups will be able to influence and approve any changes proposed.</p>	
<p>Pages 6-7, paragraphs 10.3 to 10.5</p>	<p>WR.BL.6</p>	<p>The monitoring locations indicated in Appendices A.2 and A.3 of the Monitoring Strategy are all located in the area close to the Blackwall and Silvertown Tunnels. Clearly if the Scheme causes changes in traffic flows or vehicle composition in other</p>	<p>The Applicant acknowledges that changes in traffic flow may lead to changes in air quality and noise and agrees that it is important to monitor all of these aspects of the Scheme. The Monitoring Strategy [REP1-121] encompasses air quality and noise monitoring</p>

		<p>areas which warrant further investigation or mitigation, those changes could also affect air quality and noise in those areas.</p> <p>10.4. We therefore believe that the Monitoring Strategy should provide a link between the outcomes of the traffic monitoring at other locations in the “Area of Influence” shown on Figure 3.1 and a consequent need to review air quality and noise conditions at those locations.</p> <p>10.5. This would mean that changes in traffic flow or vehicle composition in the wider area would, if sufficient to be of concern on traffic grounds, require any consequent effects on air quality or noise conditions to be investigated. This approach would effectively ensure that air quality and noise conditions in the wider area are monitored in line with traffic impacts.</p>	<p>and indicative sites are set out in the Monitoring Plan at Appendix A of that document. It should be noted in this context that STIG can recommend changes to this monitoring plan including asking for additional data collection and analysis. As explained in paragraph 7.1.5, the annual monitoring reports will contain triggers to aid STIG's consideration of whether mitigations or additional monitoring are required. Rather than have an automatic link, it is considered more appropriate for STIG to have the opportunity to consider the impacts in the broader context, because this provides for flexibility and an appropriate response in the long term.</p>
<p>Page 7, paragraphs 11.6</p>	<p>WR.BL.7</p>	<p>Firstly, BL CW Holdings Limited is concerned that the constitution, role and responsibilities of the STIG and of TfL in</p>	<p>See ‘Comments on Borough LIRs and WRs’ Report (sub theme “STIG”)</p>

		<p>relation to monitoring and mitigation are not clearly articulated in the application documents. In particular, the documents are not clear about:</p> <ul style="list-style-type: none"> a) whether TfL is required to produce annual monitoring reports prior to Scheme opening, or some other form of consolidated report to the STIG. The implication of the drafting in Section 7 of the Monitoring Report is that such reports would only be produced following Scheme opening; b) the role of the STIG during the period prior to Scheme opening and the degree to which the STIG could consider and comment on any reports produced by TfL; c) the final responsibility for decisions on Scheme mitigation or changes to the Monitoring Plan. It appears that TfL has final decision-making powers, and must “have regard” to the recommendations of the STIG but is not bound to accept those recommendations; d) how any disputed position between the STIG and TfL would be resolved. 	
<p>Page 8,</p>	<p>WR.BL.8</p>	<p>Secondly, BL CW Holdings Limited as a</p>	<p>See ‘Comments on Borough LIRs and WRs’</p>

<p>paragraphs 11.7 to 11.11</p>		<p>major landowner in the Rotherhithe area is keen to have sight of and be engaged with the work of the STIG and the outcomes and mitigation that may arise from the monitoring process. This is particularly important in the context of BL CW Holdings Limited bringing forward proposals for, and delivery of, new development at Canada Water.</p> <p>11.8. The number or nature of non-Borough stakeholders that may be invited to form part of the STIG is not clear. The Monitoring Strategy and TIMS refer to “other key stakeholders”; Article 65 of the draft DCO allows for “any other person or body TfL considers appropriate” to be a member of the STIG.</p> <p>11.9. We note that para 9 of Article 65 of the draft DCO allows for sub-groups to be formed, including “persons other than those representatives appointed in accordance with paragraph (3) [of Article 65].” It is not clear whether this means that other organisations could be involved in such sub-</p>	<p>Report (sub theme “STIG”)</p>
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	<p>groups, or whether the meaning is intended simply to include other persons from the STIG member organisations referred to in para 3 of Article 65.</p> <p>11.10. BL CW Holdings Limited has raised this in discussion with the Applicant. The Applicant has indicated that it will consider and provide further proposals on how and when non- Borough stakeholders could be involved in the STIG process, whether as members of the STIG or through the establishment of sub-groups. We await the Applicant's proposals in this regard.</p> <p>11.11. We believe it would assist all parties if the Applicant could produce a single document that clearly explains the responsibilities of the STIG and of TfL in relation to the STIG process, the decision-making powers, the way in which non-Borough stakeholders would be selected as members of the STIG or otherwise engaged in the STIG's work, its ability to influence TfL's actions and mitigations and the</p>	
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		arrangements for dealing with any disputed issues.	
Page 8-9, paragraphs 12.1 to 12.3	WR.BL.9	<p>The Monitoring Strategy and the TIMS are clearly aimed at identifying mitigation for any adverse impacts arising from the Scheme. In discussions with BL CW Holdings Limited, the Applicant has indicated that it is committed to funding any necessary and appropriate mitigation that is identified.</p> <p>12.2. BL CW Holdings Limited is concerned that no firm commitment to funding such mitigation is evident in the application documents nor does it appear to be secured through the DCO. Funding for mitigation is not mentioned in the Monitoring Strategy; the TIMS only references funding in para 2.3.3 where it says “The final sign off on funding will be the responsibility of TfL”. There appears to be no specific provision securing funding in the draft DCO.</p>	See ‘Comments on Borough LIRs and WRs’ Report (sub theme ‘Mitigation’)

		<p>12.3. BL CW Holdings Limited believes that the draft DCO should be amended so that it explicitly secures the funding by the Applicant of all necessary mitigation related to the Scheme and for a defined period post full opening of the scheme and post-scheme impact reviews.</p>	
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7 ExCeL LONDON

7.1 Comments on Written Representation

Table 6 - Key issues identified from Written Representation by ExCeL London with TfL’s commentary

Location in Representation	TfL Reference	Interested Party’s Comment	TfL Comment
Appendix 1, paragraph 4.2	WR.EX.1	<p>ExCeL’s concerns relate to the potential impacts of the proposed tunnel on local traffic congestion across the wider highway network, and whether the impacts have been considered in sufficient depth to determine whether ExCeL will be detrimentally affected. No formal agreement has been made with ExCeL to provide comfort as to how the tunnel’s construction will ensure ‘business as usual’, either during construction or post-completion. ExCeL therefore instructed Peter Brett to review TfL’s Transport Assessment. The Transport Assessment (TA), Document Reference 6.5, provides information on the</p>	<p>The Applicant has engaged with ExCeL regarding the Scheme and notes that the transport improvements that would be delivered by the Scheme are welcomed . The Applicant's assessment of the Scheme's impact on the transport network, both during its construction and operation, is set out in the Transport Assessment [APP-087]. The Applicant does not consider that the Scheme's construction will have a notable adverse impact on ExCeL; the number of construction vehicles generated is small relative to the capacity of the highway network and no road closures are envisaged to be required to roads providing direct</p>

	<p>forecast operation of the scheme and the transport impacts on the travel networks in the vicinity of the scheme. In general the predicted outcomes indicate that the proposed scheme is likely to achieve the stated objectives and ExCel welcomes transport improvements which support and enhance the resilience of east London's road network, particularly in relation to the Blackwall Tunnel. ExCel are however concerned that the continued operation of the exhibition centre particularly during the construction phase has not been considered in the development of the proposals. ExCel is concerned about potential transport impacts, and whether these have been considered in sufficient detail in order to determine whether ExCel will be detrimentally affected.</p> <p>In order to understand the operation of the network, specific junction assessments to show queues and delays are required on the following local junctions:</p> <ul style="list-style-type: none"> · Victoria Dock / Prince Regent Lane A112; · Silvertown Way / Tidal Basin Road; · Dock Road / North Woolwich Road / A1020 Connaught Bridge; 	<p>access to ExCeL. Similarly during the operation the Scheme is not expected to have a significant adverse impact on the operation of the highway network in the vicinity of ExCeL. The Applicant will seek to continue working with ExCeL to provide the assurances requested and to indicate where the information being sought is available.</p>
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		<ul style="list-style-type: none"> · Connaught Bridge / A112 Connaught Road; · Connaught Roundabout. <p>The assessment will provide an indication of the performance of the junctions with the reassigned traffic and provide an indication of whether there is likely to be a detrimental effect on ExCel's core business, and if journey times are likely to become less reliable.</p>	
<p>Appendix 1 paragraph, 4.3</p>	<p>WR.EX.2</p>	<p>The assessment process will significantly benefit from local junction assessments at the above locations and additionally with the specific sensitivity testing scenarios below:</p> <ul style="list-style-type: none"> · Inclusion of an ExCel event; · Incorporation of and ExCel event and one at the O2; · Simulation of closure / incident; · Interaction with London City Airport flows and effect of the airport expansion. 	<p>The Applicant has undertaken a wide range of sensitivity tests and these are reported in the Traffic Forecasting Report [APP-105]. Information on the wider impacts of a closure of the Blackwall Tunnel, with and without the Silvertown Tunnel, can be found in Appendix D of the Transport Assessment [APP-086]. This shows that the Silvertown Tunnel would have a notably positive impact on the performance of the road network in the event of a closure of the Blackwall Tunnel. Additional sensitivity tests to cover the scenarios requested are not planned because:</p> <ul style="list-style-type: none"> - the Silvertown Tunnel would be expected to

			<p>have a positive impact on the performance of the road network in the vicinity of the ExCeL and O2 compared to the reference case (without Scheme) scenario;</p> <ul style="list-style-type: none"> - the strategic highway modelling is based on the worst case (i.e. busiest periods, these being the AM and PM weekday peak hours) and major events at the ExCeL and the O2 and typically fall outside of these periods; and - traffic within the Royal Docks (including to/from the London City Airport) is included in the strategic highway modelling and future growth is accounted for in the model - the Applicant works closely with organizers and local authorities to safely and efficiently manage traffic and transport for major events, and will continue to do so.
<p>Appendix 1, paragraph 4.5</p>	<p>WR.EX.3</p>	<p>It is unclear why the HGV movements are the same for all periods assessed. Given the height restrictions in the Blackwall Tunnel, this may not be significant for the baseline, however, given that the proposed Silvertown Tunnel will be able to accommodate large vehicles (even double-deck buses) this may have a small detrimental effect on the local</p>	<p>Our strategy for managing HGV movements is set out in a separate Technical Note submitted as part of our answer to FWQ AQ10 [REP1-151]. The Applicant does not consider that any additional HGVs resulting from the provision of a full-height clearance crossing in this location would have a significant impact on highway performance</p>

		<p>network as the composition of flows changes accordingly. This may mean that the impact on the local network is underestimated by the transport assessment.</p>	<p>around the tunnel.</p>
<p>Appendix 1, paragraphs 4.6-4.8</p>	<p>WR.EX.4</p>	<p>In terms of the construction impacts, two broad areas are envisaged: (a) the tunnel itself and (b) the revised gyratory at the Tidal Basin junction where the northern end of the tunnel will meet the road network. Both aspects will require traffic management. Details are not available at this stage but they are likely to cause congestion as traffic is temporarily reassigned / delayed. It is unclear how the measures implemented will affect the local highway network and how this will, in turn, impact on journey times to/from ExCel. The design of the elongated Tidal Basin roundabout will rationalise various movements in the area. The associated bridge will also be redesigned and realigned. It is likely that traffic management will increase congestion on local roads but this has not been investigated in detail. Non-</p>	<p>The construction traffic impacts have been assessed within Section 6 of the Transport Assessment [APP-087], and are based on a likely envisaged construction methodology. Based on these assessments which include cumulative construction traffic (from other known development sites in the area), the impacts are expected to be minimal.</p> <p>The traffic increase due to construction traffic along Lower Lea Crossing have been quantified within the Transport Assessment. The primary site access point for the Silvertown worksite is via Tidal Basin Roundabout (TBR) and traffic management measures will be taken during various construction phases to ensure access is maintained throughout the construction period for general traffic and construction related traffic.</p>

		<p>motorised road users will be diverted, resulting in longer journey times and the possible temptation to join main carriageway routes which would appear to be more direct than following the diversion, or dissuade them altogether from these modes. This could lead to a safety issue for all road users but will also have an effect on modal choice for people going to/from ExCel. Traffic management associated with the construction of the tunnel will put pressure on the Connaught Roundabout and Connaught Bridge (both already recommended for local in-depth assessment). The effect of temporary road closures has not been studied locally and thus there is no indication of how these will affect journey times to and from ExCel or on event management.</p>	<p>Ultimately, the Code of Construction Practice (CoCP) [APP-092)] requires that Construction Traffic Management Plans (CTMPs) are prepared for each worksite. These plans will identify and include details on construction vehicle routes, volumes and potential impacts and any necessary mitigation.</p>
<p>Appendix 1, paragraph 4.9</p>	<p>WR.EX.5</p>	<p>Current timing suggests that construction is envisaged after the completion of the Thames Tide Tunnel (Beckton). There is no evidence of a contingency if both schemes overlap. Should this occur then planned HGV routes may become congested. This</p>	<p>As per the above, the cumulative construction traffic impacts have been assessed within Section 6.9 of the Transport Assessment [APP-086]. Relevant development sites within 2km of order limits were considered, with the list of those considered detailed within the</p>

		<p>eventuality should be considered in the CTMP.</p>	<p>Environmental Statement [APP-031], noting that sites excluded in cases where construction is expected to be completed before 2019. The Transport Assessment notes that the expected peak in <i>river</i> traffic movements could coincide with construction of the Thames Tideway Tunnel, however this is not expected to impact on the road network surrounding ExCeL. Committed developments within the Royal Docks and Canning Town Area were included within the cumulative construction traffic impact assessment.</p> <p>Closer to the time of construction, part of the role of developing CTMPs is to identify the most appropriate construction vehicle routes and subsequently address any potential conflicts (e.g. such as other construction projects) that may have an impact on the local area.</p>
<p>Appendix 1, paragraph 4.10</p>	<p>WR.EX.6</p>	<p>The TA suggests that construction traffic routes will not utilise Seagull or Sandstone Road. Should congestion occur on the HGV routes then there is a possibility that other</p>	<p>The construction traffic impacts have been assessed within Section 6 of the Transport Assessment [APP-086], and are based on a likely envisaged construction methodology.</p>

		<p>traffic, not controlled by the CCTMP may use Seagull Lane and Sandstone Lane as an alternative route and this may in turn have a negative impact on the operation of ExCel</p>	<p>Based on these assessments which include cumulative construction traffic (from other known development sites in the area), the impacts are expected to be minimal.</p> <p>Ultimately, the Code of Construction Practice (CoCP)[REP1-119] requires that Construction Traffic Management Plans (CTMPs) are prepared for each worksite and approved by the relevant planning authority. These plans will include details on construction vehicle routes, volumes and potential impacts and any necessary mitigation. Construction vehicles will not be permitted to travel on roads outside these areas and will not be permitted to use local roads other than for immediate access to worksites (see paragraph 3.1.4 of the CoCP [REP1-119]).</p>
<p>Appendix 1, paragraph 5.2</p>	<p>WR.EX.7</p>	<p>It is recommended that further analysis is undertaken earlier than envisaged in the Construction Code of Practice, to determine a) how the implementation of the scheme will affect the local highway network in the vicinity of the venue b) whether it is likely to have a detrimental impact on journey times</p>	<p>See WR.EX.6</p>

		to/from the venue and c) so that appropriate mitigation measures can be designed if necessary. This is particularly important in the scenarios detailed above	
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