

## Silvertown Tunnel Development Consent Order

### London Borough of Southwark

# Update and comments on the draft Development Consent Order

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<b>PINS Reference</b>		
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## 1. INTRODUCTION

1.1 The Examination into the Silvertown Tunnel draft Development Consent Order (DCO) began in October 2016 and is on-going. The London Borough of Southwark (“LB Southwark”), as a “neighbouring borough” for the purposes of the scheme, has serious concerns with the DCO and is participating in the examination.

1.2 LB Southwark has already set out written submissions on the DCO and has attended a number of the Issue Specific Hearings to make oral representations. In particular, the following documents set out LB Southwark’s concerns with the wording of the dDCO and should be read alongside this submission.

- LB Southwark’s Written Representation (document reference: REP1-008)
- LB Southwark’s Comments on the draft DCO Revision 1 (document reference REP2-13)
- LB Southwark’s Comments on the draft DCO Revision 2 (document reference REP3-036).

1.3 Whilst TfL provided an updated draft DCO at Deadline 3 (document reference REP3-003) and has also provided a working draft of its proposed Deadline 4 version of the draft DCO, the amendments proposed do not adequately address all of LB Southwark’s concerns. LB Southwark’s concerns, as set out in LB Southwark’s previous submission documents and at the ISHs therefore remain.

- 1.4 This document provides an update to the ExA on;
- LB Southwark’s discussions with TfL post the January 2017 hearings.
  - LB Southwark’s comments provided to TfL on the updated draft documents shared by TfL between Deadlines 3 and 4.
  - LB Southwark’s remaining key concerns with the wording of the dDCO.
- 1.5 This document is being submitted alongside LB Southwark’s response to the ExA’s SWQ (LB Southwark reference number: LBS 09).

## **2. DISCUSSIONS WITH TfL**

- 2.1 LB Southwark has met with TfL since attending the hearings in January; twice in relation to traffic, monitoring and mitigation (along with their consultant, GVA), and once at an air quality meeting alongside the London Boroughs of Lewisham and Hackney (along with their air quality consultant, Phlorum).
- 2.2 Whilst it has been useful to discuss the scheme with officers, the commitments that LB Southwark is hoping will be secured through the DCO are still not agreed by TfL. There also remain concerns with aspects of the modelling, mitigation and monitoring.
- 2.3 The outstanding issues, discussed at these meetings, and still not adequately addressed by TfL are as follows.

### **2.4 Benefits of the scheme**

- One of TfL’s proposed key benefits of the scheme is enhanced public transport provision, particularly bus services. LB Southwark is concerned that there is no guarantee within the DCO that LB Southwark’s roads/residents/businesses will benefit from public transport improvements. The lack of certain benefit to Southwark and the fact that

there will be increased journey times within the borough is of serious concern.

## **2.5 AADT/AAWT discussion**

2.6 TfL provided a note describing the different factors used within different parts of the assessment using AADT/AAWT, giving figures for the daily increases in traffic predicted. Although there are slight differences in the numbers they are all around 1,000 vehicles per day and very close to the DMRB value triggering air quality assessment. This note does not change the view of LB Southwark which still requires this to be robustly assessed and then monitored, as previously raised throughout the process.

## **2.7 Modelling and the Old Kent Road**

- LB Southwark remains concerned that Old Kent Road, to the south of the A200 corridor has still not been considered adequately within TfL's transport and traffic modelling.
- The London wide assessment that TfL use to inform the Silvertown Tunnel modelling is based on GLA information that envisages only minimal growth at Old Kent Road as at the time of the initial early development of the Silvertown Tunnel proposal only minimal growth was expected at Old Kent Road. However, as set out in LB Southwark's post hearing submissions (document reference: REP2-013) Old Kent Road is now designated as both a Housing Zone and an Opportunity Area by the Mayor, signalling that high levels of growth are expected. LB Southwark in conjunction with the Mayor is preparing an Area Action Plan for the Old Kent Road and around 20,000 new homes are expected to be delivered, which is significantly above the baseline growth that TfL have incorporated into the modelling for the Silvertown Tunnel. The Old Kent Road Opportunity Area and Housing Zone is in close proximity to the areas of Southwark expected to be impacted by the tunnel. Combined, these two factors of significant growth and the Opportunity Area's proximity to impact areas, highlight the importance of taking this growth into account. LB Southwark believe that TfL should carry out further work

and assessment to fully understand and the consider the implications of the growth at Old Kent Road on this part of the road network approaching Southwark's existing river crossings.

## **2.8 Monitoring and triggers**

2.9 LB Southwark welcomes a simplified merged document but the draft supplied by TfL on 28 February 2017 was still overly lengthy. Southwark have provided initial comments to TfL on the draft document as described in section 3 below and look forward to reviewing the updated document to be submitted by TfL at Deadline 4.

2.10 Paragraph 3.11.2 of the draft document sets out how any STIG members can request changes to the monitoring to enable the impacts of the scheme to be fully captured. Throughout the consultation, LB Southwark has identified areas that require monitoring but these have not made it in to the current draft as set out below. This lack of commitment from TfL at this stage gives no confidence for future changes to the monitoring as suggested in the latest draft.

2.11 As stated in previous representations and at the recent TfL meetings, LB Southwark requires monitoring (of both traffic flow and air quality) on key corridors in the borough. In summary these are;

- Tower Bridge and Rotherhithe Tunnel
- A 200 Lower Road
- Old Kent Road and
- New Kent Road.

2.12 Draft proposals for trigger points have been circulated by TfL for comment but are yet to be agreed by LB Southwark and there is concern that they may become watered down. There is some lack of clarity around the triggers but TfL advised that the Deadline 4 Submission will describe how triggers have been developed. LB Southwark looks forward to reviewing this and commenting further.

2.13 The draft document states that the triggers will cover the 'Area of Influence' (AOI) but does not include a figure to define the area. It was previously highlighted by the borough that the AOI had changed between recent documents so it is unclear what geographical area this version of the AOI actually covers. Concern remains that the monitoring does not extend far enough away from the scheme to consider the key routes within Southwark which the borough reasonably considers are likely to be affected by the operation of the scheme.

2.14 LB Southwark have previously raised the need for additional triggers and reiterate here that monitoring needs to consider peak and peak compression effects and that triggers are needed for the following;

- Journey time reliability on local roads
- journey time reliability for buses and general traffic should be assessed separately
- Road safety on all roads.

2.15 LB Southwark has pointed out to TfL that the pre-opening assessment modelling should use the most up to date and relevant information available at the time and there should be a commitment to this, for example there is modelling work being undertaken by TfL for the Canada Water area to assess the impacts of Cycle Superhighway 4.

## **2.16 STIG**

- Please see comments under section 3 and 4 of this document.

## **2.17 Air quality**

2.18 LB Southwark is concerned that TfL has so far failed to satisfactorily address the borough's valid air quality concerns. The following are those issues where LB Southwark is not yet satisfied with TfL's responses.

- The use of DMRB and IAN screening and significance criteria is not a robust or reasonable approach to the air quality assessment and

indicates that TfL believes that this scheme's impacts can be assessed less rigorously than any other traffic-generating development in a busy, central London location.

- The issue of uncertainty with traffic data and its compounding within air pollution modelling results was discussed with TfL but it was indicated that they do not intend to provide further assessment of this in answer to the ExA's 2<sup>nd</sup> Written Questions on this issue. This therefore remains a fundamental concern of LB Southwark, and is an issue which has the potential to undermine the entire air quality assessment.
- LB Southwark is pleased that TfL appears to have included in their draft Monitoring and Mitigation Strategy (which was circulated on 28<sup>th</sup> February), two air quality monitoring locations in Southwark along the A200. However, LB Southwark requests that NO<sub>2</sub> monitoring should be collocated with all traffic monitoring on the key road corridors previously stated (i.e. A200, Old Kent Road and New Kent road). As the proposed monitoring is by diffusion tubes, which are cheap to operate, LB Southwark feels that this is not an unreasonable request.
- It is appreciated that in their draft Monitoring and Mitigation Strategy, TfL has considered some of the R26 requirements from the M4 DCO, as was requested by the ExA. However, LB Southwark is concerned that significant weight is placed on the appointment of an expert consultant to annually review air quality monitoring and, potentially, modelling data, in order to advise them on potential mitigation measures. LB Southwark is extremely concerned that any appointment should be rigorously transparent and completely impartial; particularly as TfL's and LB Southwark's current experts have so far agreed on few points.
- Within the Monitoring and Mitigation Strategy, TfL has tabled a number of mitigation measures that it considers could be applied if adverse air quality effects are triggered. However, LB Southwark is concerned that other than the charging scheme, which TfL has placed significant weight on, the measures are too broad to deliver the necessary effects where they are needed. The measures include signalling and road geometry changes, which LB Southwark considers might not be possible in the air

quality hotspots within the borough that are of greatest concern. LB Southwark requests that a feasibility assessment of the practicality of such measures is carried out at those locations where mitigation might be needed most.

- The neighbouring boroughs have raised the issue that impacts from the scheme should not be worse than those predicted in the ES (which presupposes that a robust assessment has been carried out, which, due to significant uncertainty and lack of transparency with data inputs, LB Southwark does not believe has been done). LB Southwark is therefore concerned that TfL has indicated that they intend to rely on the principal of “*Not Materially Worse Than*” with regard to actual impacts compared to those that have been predicted. LB Southwark therefore requests that TfL makes it clear how this principle relates to and is different from “*Not Environmentally Worse Than*” and an explanation of the assessment of materiality in this context. If the ES is robust, it should be a precautionary and worst-case assessment. Therefore, any worsening of effect beyond those identified in the ES should be taken very seriously. To import a further judgement call as to materiality is to water down the commitment to implementing the scheme in line with the ES.

### **3. COMMENTS PROVIDED TO TFL ON THE DRAFT VERSIONS OF THE DCO, MONITORING AND MITIGATION STRATEGY, AND THE BUS STRATEGY**

- 3.1 TfL provided LB Southwark and the other neighbouring boroughs with their current draft versions of three key documents on Tuesday 28 February 2017, requesting comments no later than Thursday 2 March 2017. Current drafts of the following were shared with Southwark;
- Draft combined Monitoring and Mitigation Strategy.
  - Draft Deadline 4 DCO.
  - Draft Bus Strategy.
- 3.2 It is understood that these documents are all still subject to change prior to Deadline 4, with the final versions of each document to be submitted by TfL at Deadline 4 on 6 March 2017.
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3.43.3 LB Southwark has carried out an initial review of these draft documents to see if their concerns are now addressed, and provided TfL with initial comments on 2 March 2017. These are set out in Appendix A to this submission.

3.53.4 Additionally TfL circulated a revised plan of monitoring locations on Thursday 2 March 2017 (contained at Appendix B of this response), Though this indicates some additional monitoring there are still key routes which appear not to be included in the monitoring. As there was no associated detail in this email LB Southwark will review the version submitted by TfL at Deadline 4.

3.63.5 As can be seen from LB Southwark's comments, many of LB Southwark's concerns are not addressed through these revised documents.

#### **4. FURTHER COMMENTS ON THE UPDATED DRAFT DEVELOPMENT CONSENT ORDER**

4.1 It is understood from the discussions and emails with TfL and from the Applicant's Update Note (REP3-014) that TfL will be updating/preparing the following for Deadline 4;

- The final combined Monitoring and Mitigation Strategy.
- The final revised Bus Strategy which will also provide for the consultation arrangements with STIG and the London boroughs.
- A revised Charging Policies and Procedures document.
- An updated Article 65: STIG.

4.2 As set out in section 3, LB Southwark has had sight of and provided comments on TfL's working drafts of three of these documents. The revised Charging Policies and Procedures document has not been circulated to LB Southwark.

- 4.3 LB Southwark reserves the right and looks forward to commenting on TfL's documents once they are all formally submitted to the Examination at Deadline 4.
- 4.4 Notwithstanding the forthcoming updated documents, LB Southwark wishes to re-emphasise its existing key concerns on the wording of the dDCO which have not yet been adequately addressed by TfL. These concerns have already been set out in detail and summarised in LB Southwark's;
- Written Representation (document reference: REP1-008)
  - Comments on the draft DCO Revision 1 (document reference REP2-13)
  - Comments on the draft DCO Revision 2 (document reference REP3-036).
- 4.5 These documents should be read alongside this submission and also LB Southwark's responses to the SWQ (LB Southwark document reference: LBS 09).
- 4.6 The below sections sets out LB Southwark's further concerns on the dDCO with reference to TfL's updated draft DCO.

### Comments on the updated dDCO

#### **Definitions**

*"the monitoring and mitigation strategy" means the document of that description set out in Schedule 14 certified by the Secretary of State as the monitoring and mitigation strategy for the purpose of this Order and which in particular contains commitments in respect of:-*

- (a) traffic monitoring;*
- (b) air quality;*
- (c) noise monitoring; ~~and~~*
- (d) socio-economic monitoring; and*
- (e) the implementation of mitigation.*

- The council supports the combination of the monitoring and mitigations strategy.
- It is not clear what is meant by ‘the implementation’ of mitigation. Should (e) not just read mitigation as reference to ‘implementation’ appears to limit the extent to which mitigation will be applied. The commitment on TfL should be to successfully mitigate and not just to implement mitigation.

## **Articles**

### **Article 43 (Closing the tunnels)**

*(1) TfL may, whenever in its opinion it is necessary to do so, close either or both of the tunnels, whether wholly or partially.*

*(2) where TfL proposes to close either or both of the tunnels, it must except in an emergency-*

*(a) give not less than 7 days notice in such manner as TfL considers appropriate; and*

*(b) throughout the period of such closure display signs at convenient situations on the roads communicating with the tunnels giving warning of the closure.*

*(3) In this article “emergency” includes any circumstance which TfL considers presents an immediate and serious threat –*

*(a) to the safety or any person in or using the tunnels; or*

*(b) to the environment*

- Reference to ‘as such manner as TfL considers appropriate’ is vague. As a minimum TfL should provide local authorities (or the members of STIG) with at least 1 week notice where it plans to close 1 tunnel and 4 weeks where it plans to close both tunnels. This does not need to apply in emergency situations as defined.
- Article 43 (2) (b) is not clear and should be amended to read:- *Prior to and throughout the period of such closure display signs at appropriate convenient*

*situations on the roads network ~~communicating with the tunnels~~ giving warning of the closure.*

- TfL should be under an obligation to assess the impact of the proposed closure and to formulate and implement a suitable mitigation strategy.
- The definition of “emergency” is of little value because it contains the word ‘include’, which just means the example given is one of a number of potential emergency situations.

**Article 52 (The charging policy)**

*(1) TfL must exercise its functions under this Part in accordance with the policies and procedures set out in the charging policy-*

*(2) TfL may revise the charging policy but only after it has-*

*(a) consulted in relation to the proposed changes to the charging policy*

*(i) organisations it considers representative of regular users of the tunnels; and*

*(ii) STIG*

*(b) ~~considered~~ had due regard to the responses to the consultation carried out under sub-paragraph (a); and*

*(c) submitted the proposed revised charging policy to the Mayor of London for approval.*

*(3) Any revised charging policy proposed by TfL will only have effect if it is approved by the Mayor of London, who may approve it with or without modifications.*

*(4) If the Mayor of London intends to approve a revised charging policy with material modifications, the Mayor of London must consult-*

*(a) organisations the Mayor considers representative of regular users of the tunnels; and*

*(b) STIG,*

*on the proposed modifications and must ~~considered~~ have due regard to any responses to the consultation received when deciding whether to approve a revised charging policy.*

- This article only applies where TfL intent to ‘revise’ their charging policy and

should be amended to apply to when the charging policy 'is first set' and subsequently 'revised.'

- The requirement to consult STIG is unclear. How will this work in practice? Will TfL write to STIG as an organisation or to each individual STIG member? LB Southwark strongly believes TfL must write to each member of STIG individually and this should be reflected in the wording, as should the time period for any such response to be made. Without these amendments, the procedure is unclear.
- TfL must be under an obligation to have 'due regard' to any consultation response. Reference to just 'regard' is insufficient because this just means TfL need to lightly consider the response. Instead, TfL must be able to demonstrate that they have properly engaged with and taken into account the representation that has been made.

**Article 53 (Power to charge for use of the tunnels)**

*(1) Subject to and in accordance with the provisions of this Part, from the date when the Silvertown Tunnel is first opened for use by the public, TfL may levy charges in respect of motor vehicles using either of the tunnels.*

- This article should acknowledge the levy must be determined in accordance with the charging policy. The article could, for example, be amended to read:-

(1) Subject to and in accordance with the provisions of this Part, from the date when the Silvertown Tunnel is first opened for use by the public, TfL may levy charges, [determined in accordance with article 52](#), in respect of motor vehicles using either of the tunnels.

**Article 60 (Traffic regulation measures)**

*(8) Before exercising the powers conferred by paragraphs (1) or (3) TfL must consult such persons as TfL considers necessary and appropriate and ~~must take into consideration any~~ [have due regard to the](#) representations made to TfL by any such*

*person.*

- This article, as with article 52 (user charging), should specifically require TfL to consult each member of STIG individually. Reference to '*such persons as TfL considers necessary and appropriate*' is unsuitable. Again, the provision should set out the timeframe for any consultation response to be made and impose an obligation on TfL to have 'due regard' to any such response.

#### **Article 65 (Silvertown Tunnel Implementation Group)**

- LB Southwark welcomes the requirement for TfL to '*consult the other members of STIG on the following matters relating to the authorised development...*'
- This article does not flow very well and should be rewritten to acknowledge that TfL must consult each member of STIG individually and the ability for the group to meet is secondary to this. At the moment it is not clear how each member will be consulted and the time period for a response to be made.
- TfL should consult on the extent, nature, duration and methodology to be implemented in accordance with the monitoring and mitigation strategy.
- Article 65 (5) (c) and (d) should be swapped around and an additional subcategory covering the implementation and amendment of any bylaw should be added.
- TfL, as above, must have 'due regard' and not just 'regard' to any consultation response.
- TfL should consult the members of STIG on proposals for cross bus services and the Bus Strategy. The proposed TfL amended wording deletes the wording which previously required TfL to consult STIG in relation to buses (Article 65 (5) (e) is proposed for deletion). This is contrary to the draft Bus Strategy.

LB Southwark reserves the right to comment further once it has seen TfL's dDCO for Deadline 4. It also intends to make oral submissions during the dDCO hearing scheduled for March 2017.



## APPENDICES

### APPENDIX A: LB SOUTHWARK INITIAL COMMENTS TO TFL

The initial comments provided by LB Southwark to TfL on 2 March 2017 are set out below. These are in response to the draft versions of the DCO, Combined Monitoring and Mitigation Strategy, and Bus Strategy, as provided to LB Southwark 28 February 2017.

#### **London Borough of Southwark initial comments on TfL documents circulated 28 February 2017**

These are LB Southwark's initial comments on the three documents circulated to the boroughs on 28 February 2017. LB Southwark reserves the right to comment further once it has seen TfL's dDCO and other documents for Deadline 4. It also intends to make oral submissions during the dDCO hearing scheduled for March 2017.

#### **1. Combined Monitoring and Mitigation Strategy**

##### ***Monitoring locations***

Paragraph 3.11.2 sets out how any STIG members can request changes to the monitoring to enable the impacts of the scheme to be fully captured. Throughout the consultation LB Southwark have identified areas that require monitoring but these have not made it in to the current draft as set out below. This lack of willingness from TfL at this stage give no confidence for future changes to the monitoring in future as suggested in the latest draft. The traffic and air quality monitoring proposed within the borough does not include key links identified by the Borough throughout the process, at the January ISH's and the oral submission. These are the key links to the free crossings at Tower Bridge and Rotherhithe tunnel; A201 New Kent Road and A2 Old Kent Road

##### ***Air Quality***

- Appointment of any air quality expert to review and advise on mitigation measures must be transparent and impartial.
- There is little faith that the mitigation measures proposed by TfL will be effectively deliverable.
- It is not clear what difference there is between TfL's use of "*Not Materially Worse Than*" compared to "*Not Environmentally Worse Than*" with regard to actual impacts compared to those that have been predicted in the ES.

##### ***Mitigation Triggers***

It is stated that the triggers will cover the 'Area of Influence' (AOI) but does not include a figure to illustrate this area. It was previously highlighted by the boroughs that the AOI had changed between recent documents so it is unclear what the current AOI covers. The coverage of the AOI was also contested as not extending far enough to the north and south. Concern remains that the monitoring does not extend far enough away from the scheme.

As previously suggested to TfL and raised at the ISH in January;

- road safety needs to be monitored on all routes not just the tunnels
- journey time reliability needed on local roads
- journey time reliability for buses and general traffic should be assessed separately
- impacts need to be assessed for peak hours and compressed peak effects

## **2. Bus Strategy**

There is general concern that the commitments in the strategy are not effective or binding and there is no commitment to a level of service or benefits that will match those presented elsewhere in other examination materials. The borough has made specific representation on these points and TfL has not adequately addressed these within the latest document and as such it cannot be agreed by the Borough. It is disappointing that the proposed Bus Strategy emphasises the importance of bus services and the great opportunities that this scheme proposes to bus provision, but yet these benefits do not appear to be delivered.

Commitment 1 – residential concession. There is no detail as to who will be eligible and for how long this will be available for. There is concern that non host borough residents will not be eligible.

Commitment 2 – work with STIG to deliver change in cross river bus services. There is no detail of the routes or level of service, despite this being specifically requested by the boroughs throughout the process. A commitment to the level of bus services as within the Assessed Case is required as a minimum. This is what has been assessed with the ES and against which the benefits of the scheme have been assessed.

The proposed updated DCO Article 65 removes cross river bus services from one of the matters that STIG may consider. Therefore, it is unclear as to how STIG will actually be involved in the agreement of bus services where there appears to be no provision for their involvement within the DCO.

Commitment 6 – services for Growth Boroughs to access employment. The importance of the Growth Boroughs is understood but this excludes LB Southwark which is more directly affected by the proposals than some of the Growth Boroughs. As previously highlighted, LB Southwark contain very deprived wards, Commitment 6 needs to therefore include these boroughs specifically if it is to meet TfL’s aspiration to ...”improve access in areas of deprivation.” The definition would perhaps be better as STIG boroughs rather than Growth Boroughs.

Commitment 11 – consulting STIG on bus proposals. See comments in relation to commitment 2.

## **3. Draft Development Consent Order Comments**

### **Definitions**

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(b) air quality;  
(c) noise monitoring; ~~and~~  
(d) socio-economic monitoring; and  
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- The council supports the combination of the monitoring and mitigations strategy.
- It is not clear what is meant by ‘the implementation’ of mitigation. Should (e) not just read mitigation as reference to ‘implementation’ appears to limit the extent to which mitigation will be applied. The commitment on TfL should be to successfully mitigate and not just to implement mitigation.

## **Articles**

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- This article only applies where TfL intent to 'revise' their charging policy and should be amended to apply to when the charging policy 'is first set' and subsequently 'revised.'
- The requirement to consulted STIG is unclear. How will this work in practice? Will TfL write to STIG as an organisation or to each individual STIG member? LB Southwark strongly believes TfL must write to each member of STIG individually and this should be reflected in the wording, as should the time period for any such response to be made. Without these amendments, the procedure is unclear.
- TfL must be under an obligation to have 'due regard' to any consultation response. Reference to just 'regard' is insufficient because this just means TfL need to lightly consider the response. Instead, TfL must be able to demonstrate that they have properly engaged with and taken into account the representation that has been made.

***Article 53 (Power to charge for use of the tunnels)***

*(1) Subject to and in accordance with the provisions of this Part, from the date when the Silvertown Tunnel is first opened for use by the public, TfL may levy charges in respect of motor vehicles using either of the tunnels.*

- This article should acknowledge the levy must be determined in accordance with the charging policy. The article could, for example, be amended to read:-

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<b>Strategy.</b>
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LB Southwark reserves the right to comment further once it has seen TfL's dDCO for Deadline 4. It also intends to make oral submissions during the dDCO hearing scheduled for March 2017.

**APPENDIX B: EMAIL FROM TFL WITH REVISED MONITORING SITES PLAN  
DATED 2 MARCH 2017**

## Squires, Alison (GVA)

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**From:** Alder Chris <ChrisAlder@tfl.gov.uk>  
**Sent:** 02 March 2017 18:11  
**To:** Squires, Alison (GVA)  
**Subject:** Most up to date monitoring locations

**Categories:** Silvertown tunnel

Hi Alison,

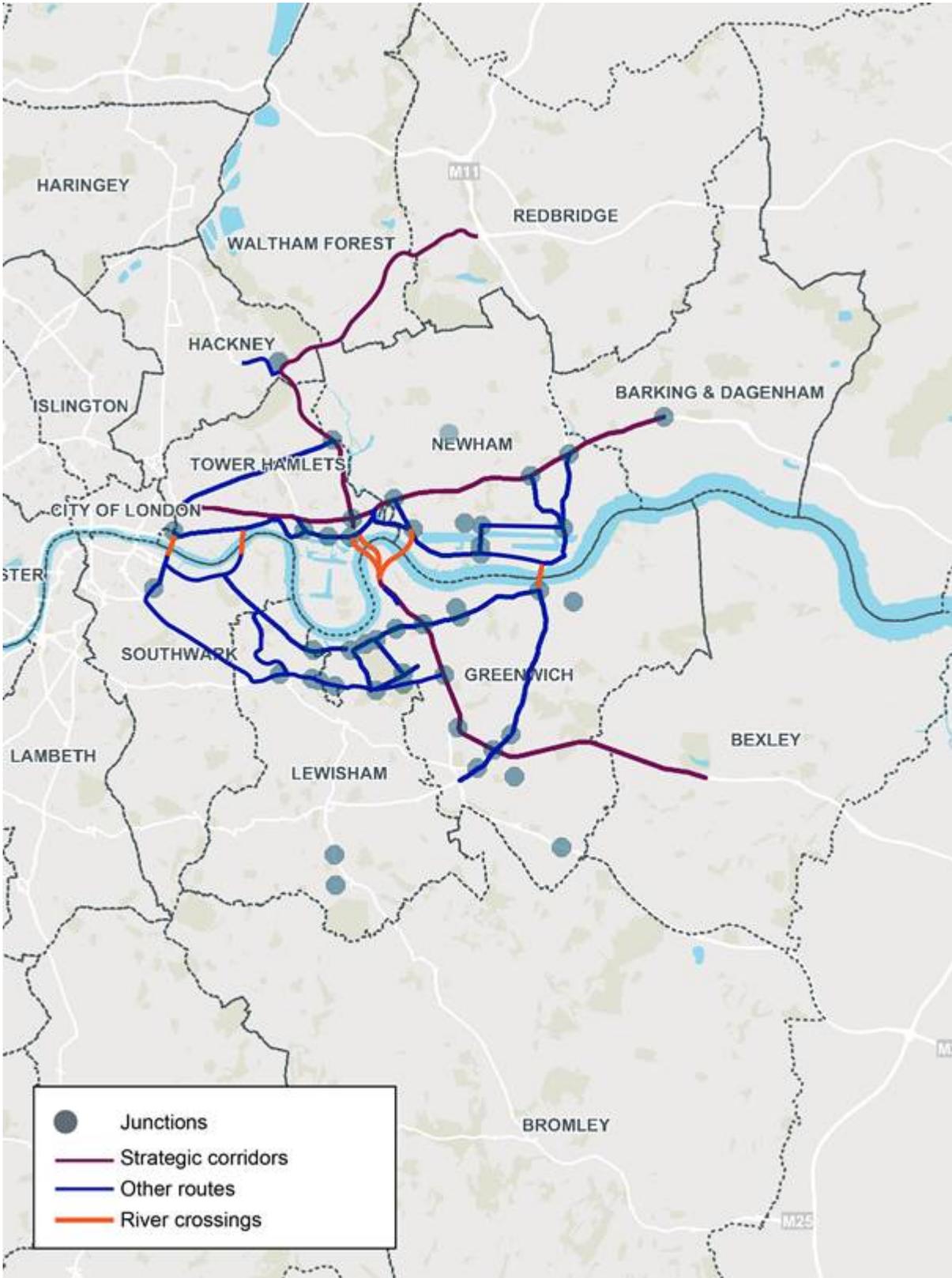
Thanks in advance for providing Southwark's comments this evening. Hopefully you will have sign-off for Hackney and Lewisham's tomorrow also

Following our conversation a moment ago I sought out the most up to date monitoring locations, as I know these have been reviewed again today.

Below is the current version of the traffic map below, which you will note show additional monitoring locations in Southwark, Lewisham and Hackney to that in the version circulated on Tuesday. The initial traffic monitoring plan table will also be updated to reflect these locations.

In addition we are also now proposing to undertake annual traffic counts at the four locations requested in Hackney (Cassland Road, Wick Road, Victoria Park Road and Kenworthy Road) as part of the monitoring programme

Hopefully this information is both welcome and helpful, and can be considered/'understood' as you finalise your D4 responses for submission to PINS.



Kind regards

Chris

**Chris Alder**  
 Consultation & Engagement Specialist | Silvertown Tunnel