

Royal Borough of Greenwich

Silvertown Tunnel Development Consent Order

Deadline 5 Submission

20th March 2017

I. Introduction

This submission contains RBG's responses to the Applicant's Deadline 4 (and earlier) submissions; however discussions concerning the Monitoring and Mitigation Strategy triggers, the contents of the revised bus strategy and the financial commitments and S106 legal agreements are ongoing with TfL at the time of writing.

There are still a number of outstanding issues for RBG that have not been addressed in TfL response to Deadline 4. These are dealt with (where appropriate) in the context of responses to revised documents, however for clarity 4 of the issues are also summarised below.

- **Commitment to bus service provision of 37.5 vehicles.** RBG recognise that TfL has amended its bus strategy, and the revision proposes a post opening increase of 20 services per hour through the tunnels. The Council maintains the position that there should be a commitment of 37.5 buses as is assumed in the scheme's Assessed Case Model, Business Case and Economic Assessment and outputs in the Environmental Statement. Currently the Applicant has not evidenced the decision for the service reduction. Further comments are set out in Section 3.
- **Charging of Woolwich Ferry:** RGB requested that, as a contingency, legislation should be prepared in advance by TfL to expedite the introduction of a charge at Woolwich should it prove necessary. This potential mitigation measures remains outstanding. Inclusion of improvements to the waiting areas for the ferry have formed part of recent discussions with TfL, and RBG looks forward to sight of the revised M&MS containing this.
- **Protection of the Maritime Greenwich World Heritage Site (WHS):** RGB raised the issue of needing to protect the WHS in its Local Impact report (paragraph 157 - 161). In Section 8 of this submission (the S106 section) a preferred mitigation method is discussed in the form of a Sustainable Transport Fund. This has been agreed with the other Host Boroughs as a pragmatic approach to addressing uncertainties within the traffic model. This was shared with TfL on 16th March.
- **The use of Brewery Wharf** for the movement of materials by river. RBG registered its concern over the inclusion of Brewery Wharf as a site to be used for the movement of materials in its Local Impact Report (paragraphs 197 - 200). RBG maintains the position that this wharf is not a viable option given the potential impact of the use of this site on the World Heritage Site of Greenwich, and the length of haulage routes on borough and local roads.

The following sections of this document set out RBG's comments on the applicant's deadline 4 submission documents, as well as a commentary on S106 progress.

2. **Document 8.84 Monitoring and Mitigation Strategy.**

As stated in RBG's response to the Examining Authority's (ExamA) second round of questions (AQ2.1) there has been ongoing dialogue with TfL on this matter following TfL's discussion note concerning the development of triggers for the monitoring and mitigation strategy (2 February 2017).

RBG has reviewed document 8.84 submitted to the ExamA and notes that the submitted document has developed to take into account the relationship that this strategy document has with the Charging Policy document and the Bus Strategy. This is welcomed.

RBG has the following comments on the revised document:

RBG welcomes the development of this strategy document and the fact that TfL has taken on board the feedback from the DCO examination. RBG would however wish for the following issues to be taken into consideration by the ExamA, and incorporated into a further revised document.

RBG agree the monitoring period of three years with the potential to be extended by a further two years (para 1.2.7).

RBG would wish to be party to the development of localised traffic mitigation measures relating to the Borough as well as a consulate as a member of STIG. Para 2.1.8 should be amended to reflect this position.

The scope of the refreshed assessment should include the development of the local traffic model. This action is assumed in bullet point six of para 2.2.1, however, RBG would wish for a specific action relating to the development of the local traffic model to be included in this list.

Para 2.2.2: It is recognised that modelling tools may develop further in the next few years but RBG would wish to see the use of agreed industry standard models for junctions applied in the modelling process.

Para 2.3 Identifying the need for and form of localised mitigation: RBG would wish to see a revised approach to that which is set out in this section of the report. The suggested metrics of increases in traffic flows of more than 30% or at least 120 vehicles per hour as a method for identifying locations for mitigation appears high and could add substantial stress on areas of the network currently experiencing issues of resilience.

Para 2.3.13 RBG would wish for the Secretary of State to be an arbiter, if necessary, on mitigation rather than an approver as cited in this paragraph.

Para 2.4.2 This paragraph should acknowledge that construction traffic management mitigation will be in place prior to implementation.

Section 3: Monitoring Programme. This section should incorporate the User Charge Assessment Framework in the principles underlying the monitoring programme.

Figure 3.1 Monitoring Area is agreed. A local site plan of the air and noise monitoring points would be very helpful.

The extent and content of the proposed socio economic monitoring is agreed.

Section 4 Post Opening Mitigation: the ExamA should note that the development of the traffic triggers is ongoing.

Section 5: Indicative Mitigation Measures. This section of the Monitoring and Mitigation strategy has been updated with a revised Appendix F. RGB welcomes the inclusion of funding local led business /labour market support and the Business Transition Scheme. Further work is ongoing with TfL to clarify the mechanisms and funding allocation.

It is recognised that many of the suggested mitigation measures are included in the dDCO documents for example, the Code of Construction Practice. This includes the use of low noise surfacing, HGV bans. The potential mitigation, included in the potential mitigation measures for the introduction of user charge on adjacent crossings is not currently feasible in the case of Woolwich Ferry.

RGB has submitted the above comments to TfL. Following the discussions at the Host Borough meeting on 8 March 2017, a comments matrix was drawn up by TfL. This is shown on page 5 (and following)

It should be noted that RBG has responded to TfL with comments on this table. There are four unresolved matters at the time of writing this submission (20th March):

- Section 2.3.2 in D4 document , this is not considered resolved by RBG,
- Section 2.3.9 in D4 document this is also considered unresolved by the council,
- Section 2.4.6 in D4 document: further clarification is required as it is not clear where this case is made and
- Section 4.2.8/3.11.2 in D4 document - the council is concerned that this document could be subject to review at an early stage in the implementation, and that the inclusion of the ability to review process at this stage gives rise to uncertainty as to the provision of a baseline of triggers agreed during the DCO and contained in this document.

	Section in DL4 version	Host Boroughs' comment	Agreed position	
1	2.1 Overview of the refreshed assessment	There is agreement in principle to this production of a refreshed assessment, however, should the ExamA not accept the proposal for a refreshed assessment as the approach may lead to information that, if available, would have influenced the Exam A recommendations then the monitoring and mitigation will need to be based upon the outputs of the ES.	<p>The HB's have no in principle difficulty with the refreshed assessment. They recognise that TfL has discharged its obligation to assess the likely significant effects of the scheme in the application but that the commitment to a refreshed assessment means that specific mitigation measures can be defined more accurately with the benefit of up to date information.</p> <p>It is appropriate for the methodology for the refreshed assessment to contain a more detailed commitment to local modelling given that it is the refreshed assessment which will determine the detail of the mitigation.</p>	
2	2.2 Scope of the refreshed assessment	The updating of the strategic transport model and the development of the local traffic models will need to be carried out as stated in our submission to D4. The updated data sets and the VoT will have to be agreed with the HB including LBTH prior to use by TfL. The re-iteration of the strategic model with the proposed local mitigation needs to be carried out and reported upon.	<p>TfL to insert words into the next version of the M&MS setting out a commitment to areas of work that will be designed through meaningful engagement with STIG members and the HBs. This will include the use of updated origin and destination data and updated values of time.</p> <p>Parties are content with the reference to local modelling at 2.2.1.</p>	□

	Section in DL4 version	Host Boroughs' comment	Agreed position	
3	2.3.2	It should be noted that methodical approach advocated in apart 2.4.1 is not supported. This process was found lacking in previous reviews and the outputs not accepted. The development of local models needs to be agreed with the LHAs, including the scope of the modelling area. The production of a long list of locations should actually form the copied area of the local model which as stated previously should be agreed with the LHAs.	Matter resolved in version of M&MS submitted at Deadline 4.	
4	2.3.5	Does not provide surety due to the phrase "could be used". A definite statement on modelling packages to be used is required here.	TfL to revise 'could' to 'will'. Agreed that specific modelling packages will not be listed as these are subject to change.	<input type="checkbox"/>
5	2.3.8	Does not make any recognition to the role of STIG in this process which is expected. There is no reference to the bi lateral work between TfL and HB that has been discussed in the meeting on 23 Feb with TfL and the HBs.	This is to be read in conjunction with Requirement 7, however some discrepancy in exact wording - an amendment to the requirement is proposed to reflect consultation with <i>relevant</i> STIG members (ie those directly impacted) rather than all members	<input type="checkbox"/>

	Section in DL4 version	Host Boroughs' comment	Agreed position	
6	2.3.9	Makes no reference to the use of triggers to determine the investigation and necessity for mitigation. As it is stated at present in this paragraph TfL will unilaterally make a decision on whether a localised mitigation measure is necessary. This is not acceptable.	The version at DL4 is clear now about the joint working that will be undertaken, together with the fact that the final decision is not made by TfL - see para 2.3.14.	
7	2.3.13 to 2.3.15	This approach is not accepted. This approach appears to run contrary to the DCO process. The guidance on DCO December 2015 refers to SoS involvement when there is a non material or material change to the DCO. There does not appear any reason here to involve the SoS unless TfL is advocating at this stage that a non material change will be incurred by the provision of mitigation. This is premature in the process as the DCO has not been determined yet.	<p>It is agreed that it is legitimate to refer matters to the Secretary of State. This is done in other DCOs and it is the Secretary of State who would have approved the mitigation through the DCO if it had been proposed in the application. The Secretary of State's role here effectively completes that process with the benefit of more up to date information. This is different from any process of material or non material change and simply involves the sign-off of matters under a requirement.</p> <p>TfL wish to agree these matters with the relevant boroughs but an approval process is nevertheless necessary - for instance for boroughs who do not agree that mitigation measures may not be proposed in their borough.</p> <p>TfL to consider again whether the wording of requirement 7 may allow matters agreed with the relevant boroughs not to be unpicked by the Secretary of State, so that the SOS only mediates on matters of disagreement.</p> <p>Ideally a time limit should be imposed on the SOS to ensure mitigation can be implemented timely. TfL explained that this wasn't acceptable to the ExA in relation to a version of the dDCO that included time limits for determination of appeals. Therefore this can't be progressed.</p>	<input type="checkbox"/>
8	2.4.2	This paragraph should clarify that CTMP mitigation will also be implemented.	Commitment currently made in CTMP/CoCP, but will be reiterated in M&MS for avoidance of doubt.	<input type="checkbox"/>

	Section in DL4 version	Host Boroughs' comment	Agreed position	
9	2.4.5	“Normal procedures” should be defined and included in this paragraph.	Matter resolved in version of M&MS submitted at Deadline 4.	
10	2.4.6	This is agreed	No action for implementation by TfL	
11	2.5.1	This paragraph should refer to an agreed timetable which is then referenced in this document.	Timetable is included in version of M&MS submitted at Deadline 4. TfL to revise text to explicitly cross reference to this timetable	<input type="checkbox"/>
12	2.5.2	The finalised scope of the monitoring programme should mirror the UCAF which is included in the certified document “Charging Policy...”	TfL to make it clearer in M&MS how UCAF and M&MS dovetail during monitoring period and to check that the information collected through the M&MS is aligned also to inform the UCAF process.	<input type="checkbox"/>
13	2.5.3	This table needs to include the commissioning and validation of survey data. The monitoring plan should mirror the UCAF sites. the strategic model needs to be revised for VOT and the zonal distribution of VOT agreed. The timescales also needs to reflect the timescales for the production for updated air quality and noise models. The submission of package of mitigation to the SoS for agreement is not agreed.	TfL to review the current timeframes to ensure these deadlines are adequate for the validation etc work required. TfL to revise current text to flag that work may commence earlier if necessary to ensure tasks are completed on time.	<input type="checkbox"/>
14	3.3.1	Monitoring is to be based on the expected impacts. It is suggested that RBG (& LBN) have a different view as to what the expected impacts compared with TfL's EIA.	Comment relates to monitoring locations for AQ monitoring. The area is set out in the M&MS and cannot be reduced. Monitoring locations are based on ES, but scope to increase these if any new areas of impact are identified by STIG members, or during the refreshed assessment process. LBN and others to consider whether there are any additional locations to be added at this stage.	Tbc

	Section in DL4 version	Host Boroughs' comment	Agreed position	
15	3.4.2	Monitoring is only to be continued for three years. This is reasonable if monitoring shows that TfL's projections for traffic & pollution as set out in the EIA are correct. If TfL's forecasts are incorrect, monitoring should be continued until the end of the forecast periods set out in the EIA. There should not be an arbitrary cut-off date of 5 years.	3-5 year period (potentially longer in the case of AQ if an exceedance is recorded) agreed as suitable monitoring duration. Matter resolved in version of M&MS submitted at Deadline 4.	
16	Figure 3-1: Monitoring area	The plan shown as appendix B and the distribution is agreed. However any environmental impacts will be dependent on traffic changes. we would like to see a more precise location of the monitoring locations which is not feasible on the scale of the appendix B map. There may also be overlap with some of our monitoring locations: especially Woolwich ver. They do give eastings and northings but a local site plan of air (and noise) monitoring points would be helpful.	TfL will provide Boroughs with a clearer depiction of the exact indicative locations in Appendix B. It was agreed that the final exact locations will be decided with the hosting local authority at the time of installation.	□
17	3.7.2	RBG would want the real time station to measure PM2.5 as well as NO2. There is increasing evidence of the impact of ultra fine particles on human health.	ES shows that the impacted area has current PM2.5 levels of ~14-16 micrograms, with any Scheme related changes predicted to be 0-0.3micrograms. It was agreed that this level is so low that it would struggle to be identified by monitors. If other variables change dramatically (NO2, traffic etc), or third party monitors show dramatic PM2.5 changes nearby this will be picked up by existing local authority monitoring.	

	Section in DL4 version	Host Boroughs' comment	Agreed position	
18	3.7.8	RBG would support this statement rather than the 5 year cut off date mentioned in 3.4.2 above.	Matter resolved in version of M&MS submitted at Deadline 4	
19	4.1.2	Monitoring sites should support the UCAF process. This needs to be reflected in this paragraph.	As per #12. M&MS to reflect UCAF linkages	<input type="checkbox"/>
20	4.2.5	The frequency of reporting needs to be included in this paragraph. It should also reflect the discussions that have taken place with regards to the use of data platforms that could provide neo real time data information.	Text including agreed frequency provided in version of M&MS submitted at Deadline 4 - para 3.10.3.	
21	3.3.1	Bullet point three should state comprehensive understanding of "travel behaviour" Bullet point four - definition of "reasonable expectations" to be included.	TfL to revise text to reference the Scheme's wider potential effects, including travel behaviour. Bullet four re reasonable expectations to be removed as superfluous.	<input type="checkbox"/>
22	3.4.1	The monitoring should support the understanding of trends. it may be the case that over time it is difficult to establish the effects of the scheme from other projects but the monitoring needs to be string enough to do so because of the obligations set around triggers and mitigation.	Matter resolved in version of M&MS submitted at Deadline 4.	
23	3.4.4	Is agreed in terms of taking into account construction traffic.	No action for implementation by TfL	

	Section in DL4 version	Host Boroughs' comment	Agreed position	
24	3.5	Geographical scope of the monitoring needs to support the UCAF and sites requested through the ExamA should be incorporated. RBG note that this is left blank! It is probably not a major issue as that changes to traffic flow are unlikely to be of such a magnitude to make a significant impact on noise levels (as opposed to air quality). We ought to have something here to comment on.	Matter resolved in version of M&MS submitted at Deadline 4.	
25	3.6.4	The control sites should be agreed with STIG	TfL best placed to decide control sites, these may extend beyond STIG boroughs. Agreed that any control sites used will be presented to STIG and sent to the hosting local authority for comment/information.	<input type="checkbox"/>
26	4.2.8	The triggers should not be reviewed again prior to scheme opening as these will be in a certified document. If changes are made to this document then the SoS needs to approve which will could cause significant timescale changes to implementation.	Agreed that if a certified document allows for changes then the SoS does not need to be involved in the stipulated change process. Agreed that some triggers may need reviewing, but not all, TfL to make explicit in the M&MS at Deadline 6 which ones may need to be varied/reviewed.	<input type="checkbox"/>
27	3.10.3	The interim reports should include discuss the results of the emerging data and potential implications/ emerging trends with regards to the triggers. This should be stated in this paragraph.	Agreed. TfL to revise text to reflect the intention to provide/present some level of analysis with regard to data collated from monitoring programme (not simply provide raw data which cannot be interpreted).	<input type="checkbox"/>

	Section in DL4 version	Host Boroughs' comment	Agreed position	
28	3.10.4	The use of data platforms should be included in paragraph as a mechanism for STIG members and HB to access data sets.	TfL to consider explicit reference to the idea of future platforms/mechanisms for sharing data. TfL to remove commitment to sharing data as soon as it is available, as realtime platforms would make this onerous and unnecessary.	<input type="checkbox"/>
29	3.11.2	If these documents are to be certified then it is not clear how monitoring will be amended easily.	As per #26. Agreed that if a certified document allows for changes then the SoS does not need to be involved in the stipulated change process.	
30	4.2.1	Traffic impacts. This paragraph implies that impacts will be experienced for a year prior to any consideration for mitigation. Is this to be the case?	M&MS commits to quarterly monitoring/reporting in year one, with an annual report at end of the year, and a check back against ES predictions. It also allows for any observed impact to be raised to TfL for consideration by STIG members at any time. The dDCO allows for emergency changes to the user charge if necessary. TfL to delete the word 'annual' from 4.2.1.	<input type="checkbox"/>
31	4.2.2	This paragraph does not include reference to the use of the refreshed case model. It should do, please include.	Agreed that this is unnecessary as paragraph refers to post-opening.	
32	4.2.12	The use of the word investigated for mitigation once triggers are activated is agreed.	TfL to make sure that 'investigated' is used not 'assessed' as in some sentences in version of M&MS submitted at Deadline 4.	<input type="checkbox"/>
33	4.3	This section should include references to other types of mitigation including the Business Transition mechanism, low income discounts and the Community Impact Fund.	TfL to insert text including references to a wider range of mitigation options, including 'soft measures'. HBs to provide TfL justification for separate funds given extensive mitigation commitment in M&MS.	<input type="checkbox"/>
34	4.4.2	This methodology should include a statement of which traffic models will be used in this process.	TfL to make clear outputs from strategic and local modelling can be used.	<input type="checkbox"/>

	Section in DL4 version	Host Boroughs' comment	Agreed position	
35	4.6	This should include the reference to the bi lateral working practice to be carried out with the HB.	Now addressed in the Deadline 4 version together with requirement 7.	
36	5.2.4	This paragraph should include the variance due to worsening environmental conditions: air quality exceedences, increase in journey times and delay.	Matter resolved in version of M&MS submitted at Deadline 4	
37	Appendix D	<p>This table should include further details on the approach to collecting socio-economic monitoring data including indicative sample sizes and frequency of surveys.</p> <p>TfL to also include commitment to monitoring participation in Business Transition Fund</p>	<p>TfL will add an additional information to the table which includes further details on how the socio-economic data will be collected, including indicative sample sizes and frequency of surveys.</p> <p>TfL will include text making commitment to monitoring participation in Business Transition Fund</p>	□
38	Appendix E	Section E of this document does not reflect the Trigger discussion paper of 2 February 2017 from TfL and therefore our comments submitted to D4 on this matter still stand.	<p>Matter resolved in version of M&MS submitted at Deadline 4, subject to the following:</p> <p>TfL to make clearer the preferred approach to reflecting variability and growth in the triggers.</p> <p>TfL to make clearer the basis of the queue-based trigger for the Woolwich Ferry (methodology outlined in separate note circulated on 27/02/17).</p> <p>HBs to provide comments on potential options for a VCR based trigger (options outlined in separate note circulated on 09/03/17).</p> <p>HBs also to provide any further comments on the trigger levels set out in Appendix E.</p>	□

	Section in DL4 version	Host Boroughs' comment	Agreed position	
39	Appendix F	The table at the end of the document which references the Discount for low income users and the Business Transition Fund should also reference the Sustainable Transport Fund and the Community Impact Fund.	See 33 above.	Tbc

3. **Document 8.82 Bus Strategy**

The Bus Strategy has undergone a considerable set of revisions since D3. RBG recognises that Requirement 13 in Schedule 12 of the dDCO now states that TfL must provide a bus strategy. The acknowledgement of the Convergence Agenda, and recognising the part the increased bus connectivity serves to aid it, is welcomed.

The clear Commitments are also a useful addition to understanding the strategy's aims and objectives.

Commitment 1 in the strategy relates to concessionary bus travel, while this is welcome TfL is currently proposing £2m one off funding allocation for the provision of concessionary bus travel to residents of the Host Boroughs once the scheme is open. It is currently unclear how this £2m would be applied and in particular benefit the low income residents of the Host Boroughs. The details of the fund and its operation will need to be developed in conjunction with TfL, preferably prior to the closure of the DCO Hearing.

Commitment 4 contains the EC regulation relating to emissions for the vehicles, for clarity reference to Euro 6 (or better) would be helpful

Commitment 5 is a provision of not less than 20 services per hour on opening. A primary concern remains for RBG in that current drafting of the bus strategy does not commit to the provision of 37.5 buses in the peak hour. TfL propose this provision will then be reviewed in alignment with the monitoring commitments.

RBG still wish for the bus strategy to commit to the provision of 37.5 buses in line with that which has been accounted for in the Economic Case and Business Case and Benefits for the proposed scheme, and which has been assumed for the Assessed Case and informed the Environmental Statement. The proposed bus network for the scheme must mitigate against the impacts of the scheme and any flexibility has to relate to the monitoring outcomes of the scheme.

No detail has been provided by TfL to support their proposal of a reduction of almost half; clarity is required regarding the evidence base supporting this.

Commitment 11: RBG would wish to see a revision to this in that TfL will commit to socio economic monitoring and information in assessing bus services rather than this being 'a consideration' as currently stated.

4. **Document 7.11 Charging Policies and Procedures**

Para 2.3.3: Clarity is still required over understanding the definition of a “limited period” for the exemption of annual registration fees of residents in the host boroughs. In principle should it be the same time period as the waiving of local business registration fees for one year (para 2.3.4)?

It is noted that a 50% discount is also being offered to residents in receipt of certain benefits. Discussions are ongoing with TfL how this could be implemented and administered and which thresholds should be applied. Facilitating low waged, car reliant, workers are a particular concern for RBG. Further clarification on this point would be welcomed.

Para 3.4 The User Charge Assessment Framework policy 13 should be linked to the monitoring and mitigation strategy metrics to enable integration of the two appraisal processes.

The environmental factors outlined in para 3.4.10 and 3.4.11 should reflect the environmental factors in the Monitoring and Mitigation Strategy.

Para 3.4.13 does not currently offer a commitment to the evaluation of the impact on the local economy, the ability of residents to access employment opportunities and the delivery of new housing. RBG would wish to see a commitment to this evaluation in line with the monitoring and mitigation strategy.

Para 4.1.6 RBG would wish to see the Secretary of State act as arbiter in the provision of non-agreed mitigation measures.

5. Doc 6.10 Code of Construction Practice (March 2017)

RBG raised comments on the draft of the submitted document 6.10 (March 2017). We have reviewed this document in light of the comments raised and found previously raised concerns to still be relevant. For completeness these comments are re iterated below:

Para 1.4.2 - The obligation for the contractor to produce the CEMP remains in the document. This is contrary to the ExamA request and the wishes of the LPA. RBG, as a minimum, would wish to see a framework CEMP agreed as part of the DCO.

Para 1.4.9 - The process of assessment that the contractor will deploy has not been fully defined. The LHA will need to understand and agree the metrics to be used in the assessment and how it is to be comparable to the ES.

Table 1.1 item 4 The CTMP is to be approved by the LPA. This will also include the lorry routes, traffic incident management and the Contractor WTP. This needs to reference Para 3.1.7 where the agreed principle lorry routes are defined.

Para 2.3.4 The changes confirm that a considerable number of work streams, including HGV movements, could be exempt from RBGs agreed working hours (shown in Para 2.3.1) and that working will effectively be 24/7. The full impact and quantum needs to be defined and safeguards agreed.

Para 2.4.7 This should state '24hr Helpline...'

Para 2.5.1 Although detailed in Section 11, for completeness the advanced works should include noise surveys.

Para 2.6.2 The temporary replacement parking for the 02 should be agreed with the LHA/LPA. This was agreed as part of the developments permissions and forms part of the monitored Travel Plan. Any replacement parking should not exceed the permitted quantum.

Para 3.1.1 Only the principle routes have been agreed (3.1.7), the full access routes to the worksites will need to be agreed with the LHA/LPA. This needs to be included in this paragraph.

Para 3.1.7 Principal HGV routes are defined here, however RBG would wish to see safeguards for the north south routes which run parallel to the A102 between (and including) Maze Hill and Charlton Lane (including Westcombe Hill) specifically excluded from route options in this paragraph.

Para 3.2.4 Point 2 It is proposed materials re used on site are counted as deemed to have been transported by river. RBG has concern that this could considerably reduce the use river and instead would wish to see a clause which requires 55% of all (suitable) materials entering or leaving the worksites to be transported by river.

Para 3.2.4 Point 3 (1) Because of the meander of the Thames at this point RBG does not agree a 4km radius is appropriate and would wish Brewery Wharf (which requires a considerable transfer of materials along residential roads) to be excluded. The wharf should be within an agreed road haulage distance.

Para 4.1.4 The inclusion of a central complaints system is welcome.

Para 5.4.2 The baseline air quality monitoring results should be shared with the LPA

Section 7 Para 7.1.2 has reference to pre-construction surveys being undertaken has been removed, please clarify why.

Para 10.2.2 The defect surveys that will be undertaken by TfL do not include any consultation or agreement of outcomes with the LPA. RBG would wish to be party to this process.

Section 11 – Para 11.2.1 there is no reference to consultation and agreement of the NVMP with the LPA. RBG would wish to be party to this process.

Para 12.2.1 The LMP - it was agreed that this should be agreed with the LPA, currently the LPA is only a consultee.

Para 13.2.1 We note that the reference to having a logistics hub has been removed. Can this be explained please?

Para 14.3.1 The document now states that the proposed mitigation has to be deemed necessary by the contractor in consultation with the LPA and the CTMP. RBG requires a level of surety that the mitigation measures will be implemented when required and not left to the discretion of the contractor.

6. Document 3.1 dDCO Revision 4 March 2017.

Part Five: User Charging

Article 52: The Charging policy: There is no reference to the use of the User Charge Assessment Framework. RGB would wish the use of UCAF in (2) of this article.

Article 56: Application by TfL of charges levied: (a) should be revised to include reference to the implementation of necessary mitigation in line with the Monitoring and Mitigation Strategy procedures.

Article 58 Transfer of Benefits of order etc.: We note that no change has been made to this article following the request by the authorities.

Article 65: Silvertown Implementation Group: The contents of this article are largely agreed by RGB. Section 9 of this article is however considered very open and the Council would ask if this actually aids STIG in its operation.

Schedule 2

Requirement 3: RGB notes they has been amended to 'accord with' the General Arrangement drawings

Requirement 5: Code of construction practice and related plans and strategies: The plans set out in (2) should be agreed with the LPA.

Requirement 6: The Landscaping Plan referenced is now submitted

Requirement 7: Monitoring and Mitigation Strategy. For ease of understanding RGB would wish to see the headings of the sections of the Monitoring and Mitigation Strategy used as the sub sections in this requirement.

Reference to the Charging Policy and its procedures should be included in this article.

Note there is no reference to pre opening mitigation.

7(1) should include reference to the provision of bus services. It is not agreed that the Secretary of State approves the mitigation as stated in (2). The Secretary of State should act as arbiter if required.

6(c) thresholds should be amended to triggers for consistency with the monitoring and Mitigation Strategy contents.

10 - "reasonably practicable" should be defined.

Requirement 13 Cross -river bus services It should be noted that section (1) of this requirement is not agreed. Section 3 the reference to the EC regulation can be simplified to refer to Euro 6 or better.

7. Emerging S106 Agreement

RBG and TfL are currently in the process of agreeing a Section 106 agreement relating to the proposed Silvertown Tunnel. This agreement covers provision for the following, the detail of which is still under discussion:

- Employment and Skills - support for the promotion of opportunities for labour and businesses in the area.
- Provision of Siebert Road Noise Barriers
- Biodiversity offsetting off £41,036 to provide bio diversity net gain and £[xxx] for the implementation of the contribution
- Fees for the discharge of requirements
- Road Safety- funds for a road safety education scheme [during the period of construction for schools on the alignment of the construction traffic routes] and for the provision of a school crossing patrols on the alignment of the construction traffic routes [£xxx]
- Provision of a cycle shuttle bus service [for a period of x years].
- Business Transitional Support Package: Commitment to a £1 million package, including waiving the registration fee and travel planning advice.

Other financial contributions being proposed and details discussed with TfL include:

- RBG is seeking to secure discounts on the Emirates Air Line to support cycle trips for commuting and complement the Cycle Shuttle Bus service, however at a meeting on 16th March with officers TfL indicated that no change in the current charging policy for EAL would be brought forward under the DCO for the Scheme. RBG is of the view that if a (free) cycle shuttle bus trial was requested by the Mayor as part of the Scheme, then to the promotion and support of a further link for cyclist by a reduction the costs for use of the Cable Car is logical and should be pursued.
- Registration waiver scheme : for a period of not less than 56 days prior to Scheme opening (and for an agreed period post opening), eligible residents and small businesses in the host boroughs will be able to register online for a payment account without paying the annual registration fee for the initial year.
- Low-income discount in host boroughs: a concession on the user charges will be available for eligible residents of host boroughs on a low income who register for an online account with TfL.
- Bus travel concessions in host boroughs: TfL will provide funding for concessionary bus travel to residents of the London Boroughs of Newham and Tower Hamlets and the Royal Borough of Greenwich for a period in accordance with the Bus Strategy after the Silvertown Tunnel opens for public use. TfL will provide £2m in funding for concessionary bus travel to residents of the host boroughs once the Scheme is open. The detail of how this will work is still under discussion.

RBG (in conjunction with the other HBs) is also seeking a Sustainable Transport Fund which will be payable should the flows through Silvertown and Blackwall Tunnel, and at other points identified by HBs, and agreed with TfL, exceed those limits stated in the Environmental Statement. TfL will pay £xx per car trip for each vehicle which exceeds the Assessed Case figures.

These monies will be held in a Sustainable Transport Fund administered by the HBs for the implementation of schemes to promote and deliver sustainable and active travel and air quality improvements in the Boroughs. This Fund will be enacted for a period of 3 years.

The following list represents the likely areas of investment:

- Pedestrian Improvements
- Cycling Improvements
- Congestion Management
- Air Quality Management
- Public Transport Improvements/ Facilities/ Support
- Park and Ride Improvements
- Controlled Parking Zones
- Parking Management
- Public Realm Improvements
- Signing Improvements