

**Application by Transport for
London for an Order Granting
Development Consent for the
Silvertown Tunnel**

(Planning Inspectorate Reference:
TR010021)

**London Borough of Tower
Hamlets**

(Reference no: SILV-396)

**Further Written Representations
for Deadline 5 - March 2017**

1. GENERAL INTRODUCTION

These are further Written Representations submitted on behalf of the London Borough of Tower Hamlets (LBTH) (“the Council”) in relation to the application by Transport for London (TfL) for a Development Consent Order (DCO) for the Silvertown Tunnel (Planning Inspectorate reference TR010021).

These Representations take into account the submissions made at Deadline 4 by TfL but concentrates particularly on the new Monitoring and Mitigation Strategy (M&MS) (document 8.84), The Silvertown Bus Strategy (document 8.82) the revised Charging Policies and Procedures (document 7.11) and the consequential amendments to the DCO itself. Account is also taken of the responses by TfL to the Second Written questions issued by Examination Panel (ExA) and finally the further positive discussions that took place at a meeting held on 9th March 2017 between TfL and the three Host Boroughs.

This Written Representation comments particularly on the significant progress that has been made towards to satisfying the Council’s concerns and aspirations for the Silvertown Tunnel project as detailed below. This is demonstrated by the helpful schedule produced by TfL (appendix 1) which summaries the commitments made by TfL and in which documents those commitments can be found. In addition, a number of detailed comments have been made on the 3 documents listed above.

2. THE COUNCIL’S CURRENT CASE

In its original consideration of the Silvertown Tunnel Scheme, the Council set 4 objectives which it considered should be met by the Scheme. Taking into account the additional and updated documents issued by TfL at Deadline 4, it is considered it would be helpful to the ExA to summarise the degree to which those objectives have been met

2.1 Reduce congestion around the Blackwall Tunnel but not result in increase in delays elsewhere on the transport network

The Council’s concerns about this issue stemmed its lack of confidence in the outputs from Assessed Case model and in particular the uncertainty surrounding drivers behavioural response to user charging, and therefore whether as a result of traffic flows in the borough being higher than predicted additional delays and congestion would arise on the network.

The Council recognises that this concern is unlikely to be resolved before the close of the Hearing although we note TfL’s commitment to undertake a refreshed assessment of Scheme impacts 3 years in advance of Scheme implementation.

However, the Council expressed some concerns as to the detail of the methodology for and inputs to the refreshed assessment.

Section 2.2 of the M&MS published Deadline 4 now provides the necessary detail as to how the refreshed assessment will be carried out and in particular provides welcome assurance that:

- the Boroughs will be consulted on details of the modeling inputs and process,
- Value of Time will be updated and validated by the use of further surveys and,
- local modelling will be used to identify the need for any localised mitigation.

Figure 2.1 in section 2 and Figure 4.1 in section 4 of the M&MS then summarises the process that will be followed in assessing the need for mitigation and then developing proposals for any adverse impacts both pre and post opening of the scheme. The Council also welcomes the proposals to consult both STIG and the relevant highway authority in developing the detail of any mitigation schemes that are necessary.

2.2 Ensure that the forecast air quality improvements are fully secured and any possible adverse impacts upon air quality fully mitigated

In its Deadline 3 and 4 submissions the Council welcomed an air quality trigger similar to that adopted for the M4 Smart Motorway Scheme but recognised that no detail had been provided as to how an air quality trigger might operate or how it might be secured in the DCO. Further detail is now provided in the M&MS. First, Appendix C of the M&MS now provides confirmation that additional air quality locations requested for the borough are now included. Second, the Council is satisfied that the criterion for the location of air quality monitors is appropriate and that annual national air quality objective for NO₂ is the optimum metric although the Council considers that air quality monitoring should be carried out for 5 years after scheme opening.

In respect to the process for mitigating any adverse air quality impacts, the Council considers that the process set out in paragraph 4.4 of the M&MS is satisfactory, in particular the proposals for the involvement of an independent air quality expert, the consultation process with STIG and consultation with air quality authorities on appropriate schemes of mitigation. The Council also considers that the possible mitigation measures set out in Appendix F identify a wide range of possible mitigation measures. The Council also recognises that variation in the user charge is likely to have the most immediate impact upon dealing with air quality mitigation.

In its Deadline 4 Representations, the Council raised the issue of whether there may be a need to make changes to the User Charge much more quickly, for example in order to discourage road travel in periods of very high air pollution, and whether the

DCO would provide for such an event. This issue was raised at the meeting with TfL held on 9th March in taking into account the revised Charging Policies and Procedures (document 7.11). In response TfL advised that it could see no reason why Policy 14 set out paragraph 4.6, which deals with temporary suspensions and variations of the user charge could not provide for such an eventuality, but LBTH would want to receive a written confirmation that this is the case.

2.3 Ensure that the bus usage predicted in the traffic model is secured through actual bus services that serve LBTH

The Council's Deadline 4 submissions made clear its continuing concern that TfL had failed to give a commitment to provide bus services as prescribed in the Economic Assessment Report, the Equalities Impact Assessment and Business Case for the scheme, and as used in the Assessed case model. The Council considered that this level of service should be a requirement in the DCO because it is crucial to the Council that the economic benefits provided by these bus services is secured for low income groups particularly bearing in mind the very low level of car ownership in the borough. The bus strategy submitted at Deadline 4 is now a much more comprehensive document and therefore the commitment set out requirement 13 of the DCO is now much more meaningful.

In its Deadline 4 submission the Council recognised that it was unrealistic to expect the indicative bus network for the Scheme, which includes up to 37.5 buses per hour in each direction, could realistically be provided on Day 1 of the operation of the Scheme and that there might need to be a phased introduction of bus services for financial and practical reasons. Commitment 5 set out 3.3 of the Bus Strategy now provides a firm commitment to a base level service for year one, which based on the Assessed Case model indicates that around 20 buses per hour during the peak periods are required to meet demand. Further clarity is required regarding which routes these 20 buses would serve and the communities that would benefit from these services.

The Bus Strategy states that this provision will then be reviewed in alignment with the monitoring commitments. However the Council still requires the bus strategy to commit to the ultimate provision of 37.5 buses in line with that which has been accounted for in the Economic Case and Business Case, the EqIA and Benefits for the proposed scheme. The proposed bus network for the Scheme must mitigate against the impacts of the scheme and any flexibility in bus provision should directly relate to the results of the monitoring as set out in the M&MS.

In respect to the Mayor's commitment to provide a residents discount for a period of time after opening, in its Deadline 4 submission the Council stated that the simplest and most cost effective means of achieving this would be to offer a discount on all bus services using the tunnel. In paragraph 2.2.2 of the Bus Strategy, TfL is now

proposing £2m one off funding allocation for the provision of concessionary bus travel to residents of the Host Boroughs once the scheme is open, which is presumably to be secured by Commitment 1 in paragraph 2.2.3. It is currently unclear how this £2m would be applied and how it would specifically benefit the low income residents of the Host Boroughs and not just general bus users. 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.

Finally, in order to ensure a long term commitment to buses, the Council also reiterates its previous request that the Silvertown Tunnel bus lane provisions set out in Schedule 11 should be made permanent. This is to protect the provision of bus service reliability through the tunnel and to prevent doubling of traffic capacity through the tunnel.

2.4 Provide guarantees that the mitigation of any adverse traffic impacts that do arise will be implemented without delay

In its Deadline 4 representations, the Council supported the principles of the Monitoring and Mitigation Strategy that was then being developed by TfL. The Council welcomed the increased emphasis on undertaking monitoring of noise, air quality and socio economic impacts as well as traffic. The Council was also satisfied that sufficient time would be available in which to implement any mitigation required, and recognised TfL's commitment to fund such mitigation works on both TfL and borough roads both before after opening of the Scheme should it be necessary.

These principles have been developed further in the Deadline 4 submission (document 8.84) to take into account the relationship that this strategy document has with the Charging Policy document and the Bus Strategy which is very much welcomed. TfL have provided a helpful summary of the commitments made to developed and implement mitigation of any adverse impacts and also identified in which documents these commitment are contained (Appendix 1). On the basis of these commitments the Council is now satisfied that the mitigation of any adverse traffic impacts that do arise will be implemented without delay.

2.5 Monitoring and Mitigation Strategy - Detailed Comments

The council acknowledges that TfL has sought to resolve a number of issues that the Council has with regards to the redrafting of the Monitoring and Mitigation Strategy. The attached appendix A matrix states the areas of agreement. However, we still have four areas of disagreement currently under discussion with TfL:

- 2.3.2 – this matter is not resolved as stated in Appendix A
- 2.3.9 – this matter is not resolved as stated in Appendix A
- 2.4.6 - evidence not found, reference required

- 4.2.8/3/11/2 - the issue for the Council is that the regular references to “review” in the certified documents means that there is no certainty as to what will be a constant measure in terms of monitoring and measuring/evaluating.

2.6 Charging Policies and Procedures

The Council notes that this document has been substantially amended and now better clarifies the interaction between the M&MS, the role of STIG and the charging policies. It is also helpful that the actual charging policies are more clearly identified highlighted by the use of ‘boxes’ within the document. The Council particularly welcomes the proposed support for low income residents set out in policies 5 and 6 which help to address the Council’s concerns that residents on low incomes would suffer from disbenefits as a result of the imposition of User Charges on Tunnel users. However, it is noted that in respect to the 50% discount being offered to residents in receipt of certain benefits no information is provided as to how long this discount would apply. Further clarification on this point would be welcomed. A number of detailed points are set out below.

Para 2.3.3 and 2.3.4: it is assumed that the definition of a “limited period” for the exemption of annual registration fees of residents in the host boroughs and local businesses is 56 days as set out in ‘Policy 5’ – this should be clarified.

Para 3.4.5: The wording of User Charge Assessment Framework ‘Policy 13’ should be linked to the monitoring and mitigation strategy metrics as described in para 3.4.4 to ensure integration of the two appraisal processes. More specifically, direct reference should be made to the ‘Relevant Factors’ described in paragraphs 3.4.6 – 3.4.16

Para 4.1.8: The Council considers that the Secretary of State act as arbiter in the provision of mitigation measures where there is disagreement between STIG and TfL only

2.7 Other Issues

Sustainable Transport Fund

LBTH proposes (as well as the other host boroughs) that a Sustainable Transport Fund be set up to offset the impact of traffic not managed by variation in charge and not accommodated through localised mitigation. Payment into the fund would arise should the average daily flows through Silvertown and Blackwall Tunnel, and at other points identified by the host borough and agreed with TfL, exceed those limits stated in the Environmental Statement. TfL would pay a fixed amount per car trip for each exceedance of the Assessed Case.

These monies would 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 host boroughs. This Fund would be enacted for a period of 3 years.

2.8: Cycling

The Council notes that a commitment to the cycle bus is now proposed to be included in a legal agreement with the borough. The Council accepts that this an appropriate mechanism for securing the commitment, but is still of the view that the scheme should operate for a minimum of 5 years after Scheme opening.

3. AMENDMENTS TO THE DCO

LBTH generally welcomes the further changes that have been made to the wording of the DCO and in particular to the addition commitments made by TfL which add certainty to the successful implementation of the Scheme. However a number of detailed concerns remain.

Article 50: Classification of Roads

LBTH confirms it has no objections to the reclassification to GLA Roads of the borough roads listed in Schedule 10, Part 1, paras 16-18, and would request that responsibility for the roads listed be transferred to the GLA prior to the commencement of construction of the Scheme.

Article 58: Transfer of Benefit of Order

TfL response to the ExA question DC2.6 is noted and the welcomes the response from TfL that is not its current intention to transfer any functions contained in the DCO in respect of user charging, the Monitoring and Mitigation Strategy or the operation of STIG. However, the Council can see no reason why such a commitment should not be included in the Article which would make explicit the intentions of TfL.

Article 65: Silvertown Implementation Group

The Council is satisfied with the revised wording of Article 65 which clarifies the role of STIG and its relationship with the M&MS and Charging Policies and Procedures

Schedule 1: Part 1: Requirements

Requirement 7: Monitory and Mitigation Strategy

The Council very much supports the inclusion of this requirement which it considers provide the necessary certainty that the necessary monitoring and mitigation will be implemented. In respect to the detailed wording, it is not agreed that the Secretary of State approves the mitigation as stated in & (2) - the Secretary of State should only act as arbiter if required.

Requirement 13: Cross River Bus Services

Although the Council welcomes the commitment to 20 buses an hour on opening, the requirement needs to include the ultimate intent to provide the 37.5 per hour bus provision as set out in the economic case.

Schedule 2: Part 2: Procedure for the Discharge of Requirements

Article 16: Applications made under Requirements

The revised wording 4 deals with the Council's outstanding concerns.

Appendix A: Monitoring and Mitigation Strategy: Note of issues agreed with the host boroughs on 9 March 2017 produced by TfL

No.	Section in DL4 version	Host Boroughs' comment	Agreed position	Change to MMS for DL6?
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 reiteration of the strategic model with the proposed	<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>	ü

		local mitigation needs to be carried out and reported upon.		
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.	ü

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	ü
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	<p>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>	<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>	ü
---	---------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---

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.	ü
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	ü
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.	ü
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	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.	ü

		for agreement is not agreed.		
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
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 exceedence 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 flyover. 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.	ü
17	3.72	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.	
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	ü
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.	ü
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	

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.	ü
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 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 Dealine 6 which ones may need to be varied/reviewed.	ü

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).	ü
28	3.10.4	The use of data platforms should be included is 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.	ü
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.	ü
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.	ü
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.	ü
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.	ü
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	This table should include further details on the approach to collecting socio-economic monitoring data including indicative sample sizes and frequency of surveys. TfL to also include commitment to	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. TfL will include text making commitment to monitoring participation in Business Transition Fund	ü

		monitoring participation in Business Transition Fund		
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>	ü
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	See 33 above.	Tbc

		Sustainable Transport Fund and the Community Impact Fund.		
--	--	-----------------------------------------------------------	--	--