

SILVERTOWN TUNNEL

Volume 8

8.108 Explanatory Note on Updated Certified Documents

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Silvertown Tunnel

8.108 Explanatory Note on Updated Certified Documents

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The Infrastructure Planning (Applications: Prescribed Forms and Procedure)
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0	05/04/2017	David Rowe (TfL Lead Sponsor)		For Deadline 6

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1. Introduction

1.1.1 This explanatory note provides a commentary on the updated versions of key certified documents submitted at Deadline 6. These documents have been the subject of ongoing discussions with interested parties since the previous versions were submitted at Deadline 4. The note also explains where the Applicant does not propose to make amendments that have been requested by an interested party, setting out the justification for the approach. The certified documents addressed in this report are:

- Bus Strategy
- Charging Policies and Procedures (CPAP)
- Monitoring and Mitigation Strategy (MMS)
- Code of Construction Practice (CoCP)
- Design Principles

1.1.2 In broad terms, where changes have been made to these documents they have been made for the following reasons:

- changes arising from continued discussions with the host and neighbouring boroughs, statutory bodies and other interested parties
- changes arising from discussions at the hearings on the 28 and 29 March 2017 (Issue Specific, Compulsory Acquisition and Open Floor Hearings)
- other points which the Applicant has identified as requiring amendment.

2. Bus Strategy

2.1.1 The Bus Strategy was submitted at Deadline 4. This was done in response to requests by the host boroughs, other interested parties and the Examining Authority to secure the provision of cross-river bus services and was supported by amendments to Requirement 13 of the dDCO. An updated version of the Bus Strategy has been submitted at Deadline 6 to reflect discussions since Deadline 4 and should be read in conjunction with the Deadline 6 version of the dDCO.

Interested party	Summary of interested party comment	Applicant's response
Host boroughs (made at meeting with TfL on 4/4/17)	The Host Boroughs would like to have a role in determining how the discounted bus concession is defined	Text has been added at paragraph 2.2.2 of the Bus Strategy submitted at DL6 to explain that TfL will work with the boroughs on the provision of concessionary travel. The commitment for TfL to provide £2m of funding for this concession has been added as 'Commitment 1' of the Bus Strategy and is expressly secured by Requirement 13(2) of the dDCO.
LB Hackney (REP4-014), Lewisham (REP4-021), Newham (REP4-012), Tower	TfL must commit to the 37.5 buses per hour as set out in the Assessed Case	Item 5 of the Written Summary for DCO ISH on 29 March sets out the Applicant's justification for why a commitment to 37.5 buses per hour is not appropriate. A commitment to a minimum service level of not less than 20 buses per hour has been included in Requirement 13 of Schedule 2 to the dDCO. In the revised Bus Strategy, express references to

<p>Hamlets (REP4-016), RB Greenwich (REP4-014), LB Southwark (REP4-018)</p>		<p>the minimum number of buses have been replaced with references to the minimum service level ‘as specified in the relevant requirement of Schedule 2 to the DCO’. This amendment has been made to ensure that the certified Bus Strategy would not be rendered inconsistent with the DCO in the event that the Secretary of State deemed it necessary to impose a higher level of bus service in Requirement 13 of the DCO.</p> <p>Commitment 5 of the Bus Strategy refers to this minimum requirement and clarifies that it applies for the duration of the monitoring period and not just for the opening year. Clarification on this point has also been added to Requirement 13(1) of the dDCO.</p> <p>To demonstrate that TfL is committed to delivering the public transport benefits that resulted from the bus network assumed in the Assessed Case, a number of amendments have been made to section 3.5 of the Bus Strategy. A new subheading ‘public transport user benefits’ has been added and explanatory text has been added at 3.5.3. In addition, a new objective – ‘Objective1’ has been added to expressly provide that TfL will seek to deliver the benefits of the bus network in the Assessed Case when developing the bus services.</p> <p>Further to this, and to demonstrate more clearly how the bus network will be developed over time, the commitments in section 3.5 have been re-framed as objectives which TfL will seek to deliver when developing and planning the bus services. Requirement 13 of the dDCO also now includes an express reference to TfL developing bus services in accordance with the objectives of the Bus Strategy.</p>
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<p>LB Hackney (REP4-014) LB Southwark (REP4-018)</p>	<p>Requires guaranteed bus service in the borough; wary of residential concession</p>	<p>It is not proposed to amend the Bus Strategy in response to this issue. The rationale for not committing to routes 6 years in advance has been set out in the Bus Strategy and under Item 5 of the Written Summary of the ISH on the draft DCO on 29 March</p>
<p>LB Hackney, LB Lewisham,</p>	<p>References to Growth Boroughs should be amended to include these boroughs</p>	<p>The term ‘Growth Boroughs’ was designated in the context of the London 2012 Games and the development of the Convergence Agenda. The host boroughs have indicated that a particular commitment should be made to the Convergence Agenda and the Bus Strategy states that TfL will seek to support the Convergence Agenda when planning criss river and advance bus services (see ‘Objective 3’ in section 3.5). Although the Strategy does not contain express reference to the ‘Growth Boroughs’ those Boroughs are member of STIG and will therefore play a role as consultees in the development of bus services in accordance with the Bus Strategy (see ‘Commitment 7’ and article 65(5) of the dDCO).</p>
<p>LB Tower Hamlets (REP4-016)</p>	<p>Bus lane must continue in perpetuity</p>	<p>Item 5 (Article 60 of DCO) of the Applicant’s Written Summary of the DCO ISH on 29 March provides TfL’s rationale for not committing to maintain the bus lane in perpetuity. Given the anticipated operational life of the tunnel (120 years) it is not considered appropriate to commit to the retention of the bus lane in perpetuity.</p>

		<p>Updated 'Commitment 3' and paragraph 2.2.6 in the Bus Strategy provide that TfL will maintain a bus lane in the tunnel for the duration of the monitoring period. The additional text at paragraph 2.2.7 explains that TfL expects this to be long-term measure and notes the statutory consultation requirements that would apply in the future in the event that TfL wished to change the designation of the bus lane.</p>
<p>Host boroughs and other STIG members (at ISH 29 March)</p>	<p>STIG must be consulted on the bus network (in relation to changes to Article 65)</p>	<p>The Bus Strategy includes a new Commitment – Commitment 7 – setting out that STIG will be consulted on the proposals for the opening bus network. Article 65(5) of the dDCO submitted at DL6 has been amended accordingly and the obligation to consult STIG members on the development of the opening bus services has been reinstated.</p>
		<p>A number of minor amendments have also been made for clarity and consistency:</p> <p>References in the text to the number of a specific DCO Requirement have been replaced with references to Schedule 2, in recognition that the numbering of the DCO requirements could change in the version of the order made by the Secretary of State. Figure 1-2 has also been updated to take account of this.</p> <p>Some of the Commitments have been renumbered to to reflect</p>

		<p>the introduction of Objectives into the the Bus Strategy.</p> <p>In paragraph 3.1.4 text has been added to note that data from the M&MS will be used when reviewing and developing the bus network after opening.</p> <p>of the wording of Commitment 4 (Euro 6) has been amended to reflect the updated wording in the latest version of Requirement 13(3) in the dDCO.</p>
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3. Charging Policies and Procedures (CPAP)

3.1.1 The Charging Policy (7.11, APP-107) was part of the DCO application, and has subsequently been revised at Deadline 1 (when it was re-named ‘Charging Policies and Procedures’ and the User Charging Assessment Framework added) and at Deadline 4.

Interested party	Summary of interested party comment	Applicant's response
Host boroughs (at meeting of 4/4/17)	The wording around the availability of the resident concession is not clear	An amendment has been made to paragraph 2.3.3 to use the same text for the residents’ concession as is used for the business concession.
Host boroughs (at meeting of 4/4/17)	Low income discount should be described as minimum 50% with potential for further targeted benefits for specific users subject to not undermining scheme objectives	Changes have been made to paragraph 2.3.7 and ‘Policy 6’ to provide that the discount will be a minimum 50%. This amendment has been made to provide the flexibility to introduce more targeted discounts as suggested by the Boroughs. Explanatory text has been added to explain that TfL will work with the host boroughs closer to Scheme opening on the details of the discount. Additionally, the commitment has been clarified to explain that the discount will available for at least the duration of the monitoring period. After this period, the provision of the discount will be reviewed by TfL.
RB Greenwich (REP4-016)	The User Charge Assessment Framework policy 13 should be linked	It would not be appropriate to include all of the M&MS metrics as there are over 100 of them. Furthermore, paragraph 3.4.2 of

	<p>to the monitoring and mitigation strategy metrics to enable integration of the two appraisal processes.</p> <p>RBG also puts forward additional metrics - 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.</p>	<p>theCPAP states that the metrics shown in the UCAF are indicative. Instead, at paragraph 3.4.4 a cross-reference has been added to the relevant section of the M&MS to emphasise the use of monitored data in the application of the UCAF.</p>
RB Greenwich	<p>RBG would wish to see the Secretary of State act as arbiter in the provision of non-agreed mitigation measures [only]</p>	<p>No change made as per response set out in relation to M&MS below.</p>
	<p>As per item 8 of ISH DCO 29 March</p>	<p>Policy 10 and paragraph 3.2.5 have been updated with new wording as used in other documents regarding the initial charge-setting.</p>
		<p>Addition of text at paragraph 4.19 in relation to noise mitigation to provide a cross-reference to the relevant DCO requirement.</p>
		<p>A number of minor amendments have also been made for clarity and consistency:</p>

		<p>References in the text and in Fig 4-2 to the number a specific DCO Requirement have been replaced with references to Schedule 2, in recognition that numbering of requirements could change in the final version of the DCO. Figure 1-2 has also been updated to take account of this</p>
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4. Monitoring and Mitigation Strategy (M&MS)

- 4.1.1 Two separate documents were submitted as part of the DCO application – the Monitoring Strategy and the Traffic Impacts Mitigation Strategy (TIMS).
- 4.1.2 In response to discussions at the hearings in late January 2017 and SWQ DC2.7 a combined Monitoring and Mitigation Strategy (M&MS) was submitted at Deadline 4. This document has replaced the two previous documents and more clearly explains:
- The Applicant’s commitment to undertaking a refreshed assessment of impacts prior to Scheme opening and to implementing any resulting mitigation measures before the Scheme opens for public use (Chapter 2);
 - The scope of the traffic, air quality and carbon, noise and socio-economic monitoring that is planned to commence not less than three years prior to Scheme opening and continue for not less than three years following opening (Chapter 3);
 - The process by which mitigation measures will be identified and implemented after the Scheme opens for public use, based on review of the monitoring data and mitigation triggers (Chapter 4); and
 - The range of potential mitigation measures available (Chapter 5).
- 4.1.3 Various revisions have been made throughout the examination, largely in response to engagement with host and neighbouring boroughs on the documents. The main comments received on the version of the M&MS submitted at Deadline 4, including comments made at the hearings in March, are set out below.

Interested party	Summary of interested party comment	Applicant's response
<p>RB Greenwich, LB Newham, LB Tower Hamlets</p>	<p>Various requests for changes to the document submitted at Deadline 4.</p> <p>All three host boroughs submitted comments relating to the M&MS in their Deadline 5 submissions, namely:</p> <ul style="list-style-type: none"> • Greenwich – REP5-011 • Newham – REP5-010 • Tower Hamlets – REP5-012 <p>The key comments related to the scope of the refreshed assessment, the thresholds for identifying potential locations for mitigation, links between the M&MS and the User Charging Assessment Framework, indicative mitigation measures, review of the mitigation triggers and the socio-economic monitoring and mitigation.</p>	<p>Engagement has been undertaken with the host boroughs on the M&MS at various points throughout the examination, most recently at meetings on 03/04/17 and 09/03/17.</p> <p>A combined comments tracker was produced following the meeting on 09/03/17 and this was included as Appendix A to the Applicant's Update Note for Deadline 5 [REP5-004]. The Applicant has made the agreed changes to the document in line with the comments tracker and further changes following subsequent discussion on 03/04/17. The key changes can be summarised as follows:</p> <ul style="list-style-type: none"> • The scope of the refreshed assessment has been widened to include assessment of the demand for bus services (para 2.2.1) • Text added to explain that TfL will engage with STIG members on the approach to completing the refreshed assessment (para 2.2.2) • Threshold for identifying locations for considering pre-opening mitigation changed from links that see a 15% increase in flows and 120 vph to 30% and 60 vph (para 2.3.3) • Reference to User Charging Assessment Framework included (para 3.1.2)

		<ul style="list-style-type: none">• Text added to confirm that borough monitoring data will be taken into account (para 3.3.2)• Text on assessing noise impacts post-opening amended as agreed (paras 4.5.1 to 4.5.5)• Text added to explain that user charging at adjacent crossings could represent a potential mitigation (paras 5.2.5 and 5.2.6)• Text added to explain that support could be provided for sustainable transport measures to address residual impacts (para 5.2.7 and 5.2.8)• Additional traffic monitoring locations added in LBN (Appendix A)• Further detail provided on scope of socio-economic monitoring (Appendix D)• Further clarification provided on traffic-related mitigation triggers and circumstances in which they may be reviewed (Appendix E)• Further potential mitigation measures added (Appendix F) <p>The Applicant's understanding is that subject to confirmation of the changes made to the document for Deadline 6, the host boroughs are content with the M&MS including the monitoring locations planned within the host boroughs' boundaries.</p>
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<p>RB Greenwich</p>	<p>RBG would wish to see the Secretary of State act as arbiter in the provision of non-agreed mitigation measures only {REP4-016}.</p>	<p>The Applicant does not consider that such a requirement could be drafted in a way that was clear and enforceable. In particular, an obligation to agree the measures with the relevant local authority could result in disputes as to whether and at what point a mitigation measure as agreed or not agreed and therefore needed to be submitted to the Secretary of State as the arbiter. This matter has been discussed and agreed with RBG.</p>
<p>LB Hackney, LB Lewisham, LB Southwark</p>	<p>Requests for specific locations for inclusion within the traffic / air quality monitoring plan (e.g. REP-019, REP-021 and REP-017).</p>	<p>The Assessed Case indicates that the Scheme would have very small changes in traffic flows on these roads.</p> <p>In all cases the changes would be 1% or less – with the exception of the A12 and Tower Bridge (2%). The roads are some distance from the site of the Scheme (4.8 km to 9.6km, by road) and the effects on traffic and air quality will be minimal.</p> <p>Monitoring of traffic flows is planned at some of these locations in response to stakeholder requests and these have been added to the M&MS, namely:</p> <ul style="list-style-type: none"> • Lower Road, Old Kent Road and Tower Bridge (LB Southwark) • Evelyn Street, Burnt Ash Road, Lee Road, Lewisham Road and the A205 (LB Lewisham) • Wick Road, Kenworthy Road, Cassland Road, Victoria Park Road and the A12 (LB Hackney).

		<p>No further monitoring is planned at additionally requested sites, as forecast changes are so small and in the event of any impacts being experienced on the remaining locations they would also be picked up elsewhere at other monitoring sites located more proximate to the Scheme.</p> <p>The proposed monitoring covers the main routes which will be sufficient to determine the scheme performance; it is not necessary to undertake monitoring on all roads on the network to determine whether the scheme is operating as expected.</p>
<p>LB Hackney, LB Lewisham, LB Southwark</p>	<p>Expansion of air quality monitoring to cover same area as traffic monitoring (e.g. REP-019, REP-021 and REP-017).</p>	<p>The proposed monitoring covers the main routes which will be sufficient to determine the scheme performance; it is not necessary to undertake monitoring on all roads on the network to determine whether the scheme is operating as expected.</p> <p>Notwithstanding this, the monitoring locations identified in the M&MS are not fixed; if the refreshed assessment showed that there was an impact in the locations mentioned by the boroughs these locations would be added to the monitoring programme.</p> <p>Further monitoring on the A200 has been included in Appendix B of the M&MS in the form of additional diffusion tube sites, as this represents a key route to the Rotherhithe Tunnel. The Applicant is continuing to engage with LB Southwark on the location of the monitors in this borough and minor changes to the locations in this borough may be made for Deadline 7.</p> <p>A more detailed explanation of the Applicant's position on the</p>

		expansion of air quality monitoring is set out in Section 5.2 of the Applicant's Written Summary of submissions to the ISH on 28 March.
LB Hackney	LBH requested in meetings that confirmation is required that any monitoring undertaken by local authorities will be taken into account	The Applicant has confirmed that this is the case and has added text to the M&MS submitted at DL6 to reflect this (para 3.3.2). Also references at para 3.7.1 and 4.4.2.
LB Hackney, LB Lewisham, LB Southwark	Traffic monitoring needs to cover all times of the day to ensure 'peak compression' effects can be identified, not just on a 24 hour or peak period basis (e.g. REP4-019)	Traffic flows will be monitored by hour, and reported in this format in the monitoring reports, meaning that 'peak compression' impacts can be identified. Appendix A of the M&MS submitted at DL6 has been amended to make this clearer.
London City Airport	Independent oversight/control is needed for post-opening mitigation measures – for example Secretary of State approval (REP5-027).	The Applicant does not consider there is any need for independent oversight in the post-opening monitoring and mitigation, given the non-specialist subject matter and the Applicant's expertise in traffic management, together with the role of STIG members and the local highway authority in developing the monitoring and mitigation required. It should be noted that the Secretary of State is required to approve the pre-opening mitigation.

5. Code of Construction Practice (CoCP)

5.1.1 The CoCP was submitted as part of the DCO application. This document has been updated prior to the Preliminary Meeting and at Deadlines 1, 2 and 4 in response to discussions with Host Boroughs and other interested parties, including the Port of London Authority and the Environment Agency.

Interested party	Summary of interested party comment	Applicant's response
Port of London Authority (PLA)	In response to SWQ DC2.9 the PLA commented at Deadline (DL) 4 (REP4-069) that whilst the CoCP has been updated to provide for the consultation with the PLA on the CEMP, the CSRS and the Lighting Management Plan, Requirement 5(2) omits the requirement to consult the PLA in relation to these plans.	The Applicant notes that this was an omission from the DL4 version of the dDCO. This was included in the pre-hearing version of the dDCO, and in the version submitted at Deadline 6.
PLA	In response to SWQ DC2.9 the PLA commented at DL4 (REP4-069) that in relation to sections 1.4.8 – 1.4.10 of the CoCP “not materially worse” is not the correct test. It should read “not materially different”. This was also discussed at the Issue	Sections 1.4.8 – 1.4.10 amended at DL6 provides for a “not materially new or materially different” test as the PLA had suggested. Further commentary on this point is provided in the Applicant’s written summary for the outstanding issues including environmental matters issue specific hearing (ref: 8.109).

	Specific Hearings on 28 and 29 March.	
PLA, LBN	<p>In response to SWQ DC2.9 the PLA commented that the CoCP provides the Applicant with the ability to approve 'Additional Derogations' to the river transport commitment (REP-069).</p> <p>The Applicant has also undergone a number of discussions with LBN regarding the Construction Transportation chapter of the CoCP.</p>	<p>TfL provided revised wording to the PLA prior to Deadline 6 providing for approval of the derogations to the river transport commitment by the relevant planning authority in consultation with the PLA. It is understood that the PLA agree to this amendment.</p> <p>As a consequence, Section 3.2 of the CoCP submitted at DL6 has been amended to reflect this change. This revised section also includes a requirement that monthly monitoring reports will be provided by the Contractor and submitted to the LPAs, TfL and the PLA demonstrating how the river transport commitment is being met or what remedial action is proposed; and that should any derogation be necessary, approval by the LPA, in consultation with the PLA, would be required.</p>
LBN	The Applicant has undergone a number of discussions with LBN regarding the Construction Transportation chapter of the CoCP.	The Applicant has removed Royal Docks Road from the principal routes (section 3.1.7).
LBN, RBG, EA	At the Environmental Issue Specific Hearing (28 March 2017) LBN, RBG and the EA all made oral representations that they would prefer that remediation was dealt with as a	Further to ongoing discussions with the Boroughs and the EA, the Applicant has agreed that provision in relation to these matters can be incorporated into the DCO and has presented its preferred version of the wording for this requirement at Deadline 6.

	requirement in the DCO rather than in the CoCP	This continues to be discussed with the Boroughs and the EA, and it is anticipated that the wording can be presented as an agreed position at Deadline 7..
LBN	The Applicant has undergone a number of offline discussions with LBN regarding the Noise and Vibration chapter of the CoCP.	The Applicant has altered the chronology of Noise and Vibration chapter (section 11) following consultation with LBN and this has been submitted at DL6
LBN	The Applicant has undergone a number of discussions with LBN regarding the Noise and Vibration Mitigation Scheme (Appendix G).	The Applicant has altered the Noise and Vibration Mitigation Scheme (Appendix G) following consultation with LBN and this has been submitted at DL6.
RBG	In response to SWQ CL2.6 RBG commented at DL4 (REP4-014) that they have concerns that materials re used on site are counted as deemed to have been transported by river. RBG are concerned this could considerably reduce the use river and instead would wish to see a clause which requires 55% of all (suitable) materials entering of leaving the	<p>The Applicant considers that it is necessary to include materials re-used on site as forming part of the river transport commitments. This is because unless re-use on site is counted as river transport, the Contractor will be incentivised to remove spoil from site rather than re-use it if the opportunity arises, which would go against the hierarchy introduced by the Waste Framework Directive</p> <p>The river transport commitments are worded such because the potential opportunity to re-use large volumes of soil on site only</p>

	<p>worksites to be transported by river.</p>	<p>came to light after the river transport commitments were developed.,</p> <p>This is technically possible as the type of material that we have modelled to be suitable to be taken out of site by river is the same material that will be able to be re-used on site (i.e. excavated spoil).</p> <p>Therefore if opportunity arose to re-use, say, 10% of total material on site, unless this is contained within the river transport commitments, the Contractor would be incentivised by the commitment to take the spoil out by river rather than take up the option to re-use on site.</p> <p>This is because, if he re-uses the material on site he needs to identify a further 10% of materials that were not envisaged as being able to be taken by river to now be taken by river. Our modelling indicates that this is not likely to be feasible, so the Contractor will have to ignore the opportunity to re-use on site (the best environmental option) in order to meet the 55% commitment.</p> <p>The Applicant therefore does not propose to amend the CoCP in this regard.</p>
<p>RBG</p>	<p>In their Local Impact Report (REP1-002) submitted at DL1 RBG commented that they have concerns that they would wish that TfL are required through the DCO to commit to a quantum of movement by river from each worksite</p>	<p>The Applicant does not consider that the optimal scheme-wide environmental effects would be achieved by committing to specific percentages of materials to be transported by river for each worksite.</p> <p>It is also important to remember that, upon completion of the first bore, the sites are completely connected, and become 'one site'</p>

		<p>straddling two boroughs.</p> <p>The commitment has been modelled using the envisaged construction methodology detailed in the Construction Method Statement and the Reference Design and has been demonstrated to be achievable. However, this model makes a number of assumptions such as the following;</p> <ul style="list-style-type: none">• The total volume of materials to be removed and imported (i.e. currently based on the Reference Design, could alter significantly upon completion of Detailed Design);• The origin of materials to be transported to site;• The nature of waste arisings; and• That all bored tunnel arisings are currently modelled to be removed through the Newham site <p>Due to the latter assumptions, the model is heavily weighted towards optimising river transport on the Newham worksite due to the presence of an existing wharf, the proposal to construct a temporary jetty on the north, and having sufficient space to stockpile material.</p> <p>The Applicant believes that stipulating borough-specific targets for river transport would stifle flexibility, constrain construction methodology, potentially create monopoly situations and may lead to counter-productive behaviours (i.e. double handling) in order to achieve them.</p> <p>The Applicant considers that the combination of the river transport commitments, the Contractor's compliance with the Receptor Site</p>
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		<p>Assessment, and borough approval of the Construction Traffic Management Plan will lead to the overall scheme benefits of reducing construction traffic and maximising use of the River Thames, and that no further benefit would be achieved by committing to borough specific targets.</p> <p>Further to this, the Applicant considers that there would be two options for implementing a borough specific commitment, but that neither option would be suitable;</p> <ul style="list-style-type: none"> a) Point of arrival/departure – a commitment based upon the borough that materials left/arrived from/at the site. If Greenwich were to achieve a meaningful commitment, the effect on construction logistics would be to force more of the road transport to Newham – which already has the greatest burden of materials in/out. b) Origin/destination – a commitment based upon the borough that materials ended up in or were removed from. Greenwich could make up a lot of their commitment simply by the fact that the bored materials move in and out of Newham. This would also be almost impossible to audit with any accuracy.
<p>RBG</p>	<p>RBG has commented on a number of occasions, including in response to SWQ CL2.6 submitted at DL4 (REP4-014) that they do not agree a 4km radius is appropriate and would wish Brewery Wharf to be excluded from</p>	<p>The Applicant has assessed the use of Brewery Wharf as a worst case scenario in ES and there are no adverse impacts reported.</p> <p>Without Brewery Wharf, there is only 1 other wharf in Greenwich capable of exporting material by river. Therefore, without Brewery Wharf, the Applicant’s options for transporting material by river</p>

	<p>possible wharves.</p>	<p>are significantly reduced.</p> <p>As the proposed worksite on the Greenwich Peninsula does not have direct access to the riverfront, utilisation of a local wharf and associated short-haul construction vehicle movements (including HGVs) would be required to transport materials to and/or from the worksite via river. A number of possible local wharves that could be used for this purpose exist within 4km of the Greenwich worksite, including Brewery Wharf.</p> <p>For the purpose of presenting a ‘worst case’ assessment, Brewery Wharf was assessed in the Transport Assessment (section 6.7) (APP-086) as this was the furthest local wharf considered to be a viable option. Brewery Wharf is an existing wharf which is located within Greenwich on Deptford Creek, capable of importing material, which currently generates a number of HGV trips in the local area. The wharf is located within 3km of the proposed worksite as the crow flies, and less than 8km by road (avoiding the A206).</p> <p>Ultimately, the construction vehicle routes will be set out within Construction Traffic Management Plans (CTMPs). As stated in Section 3.1.4 of the Code of Construction Practice (CoCP) (REP1-119), “Detailed construction and delivery traffic routes will be specified and agreed by the relevant planning authority in consultation with the relevant highway authority, with local roads only to be used for immediate access to the worksites or local businesses (including wharves).”</p> <p>Ultimate control of the routes that vehicles will take will therefore lie with the Royal Borough of Greenwich.</p>
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<p>RBG</p>	<p>In response to SWQ CL2.6 RBG commented at DL4 (REP4-014) that they would wish to see a framework CEMP agreed as part of the DCO.</p>	<p>The Applicant has explained in their response to SWQ DC2.9 (REP4-052) submitted at DL4 that this is not necessary. The CoCP is being used to secure the environmental mitigations for the Scheme and is the ‘framework’ document for the purposes of this project. As explained in the response to DC2.9, this is merely a difference in terminology from framework CEMPs that are utilised on other projects.. Where it is not possible to define these at this stage, subsidiary plans are to be produced for approval. The CEMP for this project performs a specific contractual and management role (as it did on Thames Tideway Tunnel), and will simply reflect the processes and procedures to meet the methodologies and commitments in the subsidiary plans that the LPAs will approve.</p>
<p>PLA</p>	<p>In response to SWQ DC2.9 the PLA commented at DL4 (REP4-069) that they would wish to see a specific section in the CoCP that ensured that the risk of spillage of materials into the river would be minimised.</p>	<p>The Applicant has had further discussions with the PLA regarding what controls will be in place to minimise the risk of spillage of materials while being loaded onto, or unloaded from, barges or other vessels.</p> <p>The Applicant considers that this risk will be addressed through the Marine Pollution Contingency Plan which will be submitted to the Marine Management Organisation (MMO) for approval under the Deemed Marine Licence, in consultation with the Environment Agency and Port of London Authority.</p> <p>However, notwithstanding this risk being addressed through the Marine Pollution Contingency Plan, the Applicant has updated the CoCP at Deadline 6 to explicitly state in Section 15.1.3 that the</p>

		Contractor will employ measures to minimise the risk of spillage of materials while being loaded onto, or unloaded from, barges or other vessels.
Natural England	Following Deadline 4, Natural England requested an amendment to the Outline Ecological Management Plan to include reference to brownfield habitats.	The Applicant agreed to make this amendment in the Applicant's Update Report (REP5-004). Section 4.1 of the OEMP (Appendix H of the CoCP) has therefore now been amended to reflect the wording agreed with NE and submitted at Deadline 6.
RBG	In response to SWQ CL2.6 RBG commented at DL 4 (REP4-014) that they 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.	The Applicant considers that no further safeguards are necessary given that RBG have a right of approval over the Construction Traffic Management Plan (CTMP) and can enforce these safeguards, if necessary, when approving the CTMP.

6. Design Principles

6.1.1 The Design Principles document was submitted as part of the DCO application. This document has been updated at Deadlines 2 and 4 in response to discussions with Host Boroughs and other interested parties, including landowners.

Interested party	Summary of interested party comment	Applicant's response
Knight Dragon	On going discussions leading to a request for Knight Dragon and/or GLA to have a place on the Design Review Panel.	The Applicant does not propose to make the requested change as this would remove the independence of the Design Review Panel. Knight Dragon and the GLA already have a place on the Stakeholder Design Consultation Group, which the Applicant considers is the correct forum to capture Knight Dragons views.
U+I	Representations at DL4 & 5 requesting a southbound bus stop on Tunnel Avenue and more clarity on the width of the shared foot and cycle way.	<ul style="list-style-type: none"> • Added a design principle to the Boord Street bridge principles • Added an additional point and illustrative sections to the design guidance for Tunnel Avenue in Appendix C of the design principles
Host boroughs	In host borough meetings a request was made for the boroughs be given a full role in the Stakeholder Design Consultation Group.	The Terms of Reference have been changed to clarify that the boroughs will be able to provide a summary of expectations and concerns regarding the agenda items at the beginning of each session. However, the Applicant considers that the host boroughs

		principle role is through the approval of design details.
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