

## Silvertown Tunnel Development Consent Order

### London Borough of Southwark

# Post-hearings submissions and further comments

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<b>Authors</b>	LB Southwark, Project Centre, Phlorum, GVA	
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## 1. INTRODUCTION

- 1.1 Transport for London (“TfL”) submitted the application for the Silvertown Tunnel Development Consent Order (“DCO”) in April 2016. The DCO Examination began in October 2016 and closes on 11 April 2017.
- 1.2 The London Borough Southwark (“LB Southwark”) has been involved throughout the examination, submitting documents at each deadline and attending and making oral submissions at the Issue Specific Hearings (“ISH”).
- 1.3 For ease of reference LB Southwark’s documents already submitted to the examination (plus the relevant representation) are set out below;
  - Relevant representation (RR-190).
  - Written representation (REP1-008).
  - Local Impact Report (REP1-009).
  - Response to ExA’s First Written Questions (REP1-010).
  - Response to Rule 17 letter (REP1-011).
  - Post-hearing submissions including written submissions of oral case in relation to the Issue Specific Hearing on Traffic and Transport Modelling (REP2-013).
  - Responses to TfL’s responses to the ExA’s First Written Questions (REP2-013).
  - Comments on the draft Development Consent Order Revision 1 (REP2-013).
  - Adjacent River Crossings report (REP2-013).
  - Post-hearing submissions on traffic modelling, forecasting, user charging and economic issues (REP3-036).
  - Post-hearing submissions on air quality, noise and other environmental issues (REP3-036).
  - Comments on the draft Development Consent Order Revision 2 (REP3-036).

- Response to ExA's Second Written Questions (REP4-017).
- Update and comments on the updated draft Development Consent Order (REP4-018).
- Comments on TfL's Responses to Examining Authority's Second Written Questions and Deadline 4 Submissions (REP5-009).

1.4 LB Southwark has reviewed TfL's Deadline 5 submissions, and attended and made oral representations at the ISH on any other outstanding issues including Environmental Matters (28 March 2017) and the ISH on the dDCO and other matters of legal drafting (29 March 2017). As set out at these ISHs, LB Southwark has a number of outstanding issues with the proposed scheme, dDCO and certified documents.

1.5 This document summarises LB Southwark's most up-to-date position on the Silvertown Tunnel application and dDCO, and should be read alongside the documents and comments already submitted to the examination. All these points have been made consistently throughout the examination process but are now combined into one document for ease of reference and to update the examination on LB Southwark's current position.

1.6 It is understood from the ISHs that TfL will be updating the dDCO and certified documents at Deadline 6 to take into account Interested Parties' comments. TfL is already aware of all of Southwark's comments. The Council welcomes TfL's continued assurances that concerns will be addressed with Interested Parties and awaits with interest to see how Southwark's remaining concerns are now addressed. It is understood from further correspondence with TfL post the March ISHs that TfL are not proposing to make some of the changes that LB Southwark has requested. Southwark and TfL hold different opinions on some of these issues and points. LB Southwark has thus set out its position clearly in this document where it disagrees with TfL. In addition it is worth noting that LB

Southwark and TfL entered into a draft Statement of Common Ground at Deadline 1 (REP1-137). LB Southwark had understood that this was to be updated with TfL throughout the examination as discussions progressed. LB Southwark has not been approached by TfL at subsequent meetings or through email correspondence to agree an updated Statement of Common Ground.

## **2. BENEFITS OF THE SCHEME/BUS STRATEGY**

- 2.1 One of TfL's proposed key benefits of the scheme is enhanced public transport provision, particularly bus services. LB Southwark welcomes TfL's commitment to provide not less than 20 bus per hour service in the updated Bus Strategy (document reference: REP4-044) and requirement 13 of TfL's Deadline 4 dDCO (document reference: REP4-025). However, the borough is concerned that by failing to secure the full 37.5bph as is assessed in the Assessed Case, the current dDCO fails to ensure that LB Southwark's roads/residents/businesses will benefit from public transport improvements as assessed in the ES or at all. Furthermore, if the benefits of the scheme stated in the ES are based on the Assessed Case, then the provision of services at a lower level can only result in a failure of the proposed development to effectively mitigate its impacts. Without the delivery of the required mitigation, then the impacts of the Assessed Case will be greater.
- 2.2 At the ISH on 28 March, the applicant stated that the bus service benefits could be achieved through providing a 20bph service rather than the modelled 37.5bph. In reviewing the technical note supplied by TfL "Silvertown Tunnel – Public Transport Benefits in Southwark" dated 27th February 2017, the note explains that the public transport benefits in the borough are "marginal" and will be brought about mainly by reducing demand on rail services to London Bridge. It is understood that this document has not been submitted to the examination by TfL, and so to

ensure that the ExA and SoS are aware of LB Southwark's position on this, the technical note is provided at Appendix A to this report. Given the applicant's view that through a different mechanism the same benefits can be achieved, the borough further questions the role the Silvertown Tunnel will have in relieving rail congestion to derive a positive benefit for the borough.

- 2.3 It is clear that economic benefits are significantly reduced without the full commitment to the bus services, as assessed in the Assessed Case. LB Southwark is concerned that the Bus Strategy and the DCO does not contain sufficient commitment to the level of service nor any proposed routes and that the borough is not to be consulted as part of the route development. LB Southwark has expressed concerns that TfL has amended Article 65: Silvertown Implementation Group, to remove the requirement to consult all of STIG members on proposals for cross river bus services. Further comments on this point are set out in our comments on the dDCO in section 9 of this submission. The cross river bus services provide an indirect benefit to Southwark in providing congestion relief on existing services in the borough. However, these existing services are potentially facing increased journey times within the borough as a result of increasing traffic flow and the lack of the engagement with the borough in providing a strategic approach to bus services and consultation is of serious concern.

### **3. PACKAGE OF RIVER CROSSINGS**

- 3.1 The ExA's SWQ GA2.7 asked the applicant about its proposed package of river crossings which Silvertown Tunnel is part of. The question is of interest to LB Southwark, particularly as Southwark is supportive of the proposed Rotherhithe to Canary Wharf pedestrian and cycle bridge. The proposed bridge will provide a pedestrian and cycle link between the London Boroughs of Southwark and Tower Hamlets.

- 3.2 As the ExA has picked up in this question, there is no actual commitment or funding by TfL for the proposed bridge. As set out in LB Southwark's responses to TfL's responses to FWQ PN2 (document reference: REP2-013), TfL notes within their response to the FWQ that there is no funding for the bridge. As set out already in LB Southwark's response, there is also no commitment to the proposed bridge within the DCO or elsewhere and thus LB Southwark remains unconvinced that the Silvertown Tunnel will contribute to improving walking and cycling.
- 3.3 TfL's response to the SWQ (document reference: REP4-055) confirms Mayoral commitment to these schemes and states that budget for the pedestrian and cycle crossing between Rotherhithe and Canary Wharf has been allocated in TfL's latest Business Plan under the Healthy Streets portfolio. The response goes on to advise that work to procure a delivery team is underway and that construction is expected to start in 2020. Whilst this intention is welcomed by LB Southwark, it does not address the borough's concerns and falls short of being a meaningful, enforceable commitment. The crossing must be secured or committed in a meaningful way through the DCO.

#### **4. MODELLING AND THE OLD KENT ROAD**

- 4.1 LB Southwark remains concerned that Old Kent Road, to the south of the A200 corridor has still not been considered adequately within TfL's transport and traffic modelling.
- 4.2 The London wide assessment that TfL use to inform the Silvertown Tunnel modelling is based on GLA information that envisages only minimal growth at Old Kent Road as at the time of the initial early development of the Silvertown Tunnel proposal only minimal growth was expected at Old Kent Road. However, as set out in LB Southwark's post hearing submissions (document reference: REP2-013) Old Kent Road is now designated as both a Housing Zone and an Opportunity Area by the Mayor, and as an

Action Area by LB Southwark, which means that a significant level of growth is projected to occur within the relevant timeframe for the scheme. LB Southwark, in conjunction with the Mayor, is preparing an Area Action Plan for the Old Kent Road and around 20,000 new homes are expected to be delivered, which is significantly above the baseline growth that TfL have incorporated into the modelling for the Silvertown Tunnel. The Old Kent Road Opportunity Area/Action Area and Housing Zone is in close proximity to the areas of Southwark expected to be impacted by the tunnel. Given the planning designations introduced by the Mayor and the forthcoming area action plan/opportunity area planning framework to be adopted by both Southwark and the Mayor as a joint area action plan/opportunity area planning framework, the growth is sufficiently certain and ought to be taken into account in the assessment of this application. LB Southwark has already begun preparation of the area action plan/opportunity area planning framework, and the Council consulted on a draft plan in 2016. To assist the Examination, Appendix B of this submission sets three pages of the plan to illustrate the extent of the commitment to delivering at least 20,000 new homes and the fact that this is a joint plan between the Council and the GLA. Both the vision and policy AAP2 clearly set out that at least 20,000 new homes are expected. Combined, the two factors of significant growth and the Opportunity Area/action area's proximity to impact areas, highlight the importance of taking this growth into account.

- 4.3 LB Southwark believe that TfL should carry out further work and assessment to fully understand and consider the implications of the growth at Old Kent Road on this part of the road network approaching Southwark's existing river crossings. However, given this assessment has not been undertaken a pragmatic solution is for the Applicant to commit to including this assessment within any refreshed assessment of the scheme prior to opening. Any such refreshed assessment should commit to taking this growth into account and must be based on the most appropriate and accurate modelling package for the area (as opposed to an East London

focussed modelling package) to best understand the relationship between the growth area and the Silvertown Tunnel project.

## **5. AIR QUALITY ASSESSMENT**

- 5.1 LB Southwark is concerned that TfL has so far failed to satisfactorily address the borough's valid air quality concerns. The following are those issues where LB Southwark is not yet satisfied with TfL's responses.
- 5.2 The use of DMRB and IAN screening and significance criteria is not a robust or reasonable approach to the air quality assessment and indicates that TfL believes that this scheme's impacts can be assessed less rigorously than any other traffic-generating development in a busy, central London location.
- 5.3 TfL has provided some explanation of traffic model uncertainty. However, no discussion or testing of how this uncertainty might increase the inaccuracy of air dispersion modelling outputs in the air quality assessment has been provided. This has the potential to undermine the entire air quality assessment.

## **6. CHARGING POLICIES AND PROCEDURES**

- 6.1 The Charging Policies and Procedures certified document will be the mechanism through which a low income resident's discount will be applied. The council is interested in how this has been tested in traffic modelling terms and the likely impact on usage of Rotherhithe tunnel (as the nearest free crossing).

## **7. MONITORING AND MITIGATION STRATEGY**

- 7.1 TfL have submitted a note to LB Southwark addressing some of the key issues the borough has with the Monitoring and Mitigation Strategy

document. This is attached at Appendix C to this submission and referred to as MMS Note below where relevant.

- 7.2 LB Southwark has pointed out to TfL that the pre-opening assessment modelling should use the most up to date and relevant information available at the time and there should be a commitment to this, for example there is modelling work being undertaken by TfL for the Canada Water area to assess the impacts of Cycle Superhighway 4.
- 7.3 Section 2.2 of the revised Monitoring and Mitigation Strategy (M&MS) (document reference REP4-046) sets out the scope of the refreshed assessment. If TfL address LB Southwark's issues with the monitoring programme then the Council would be satisfied in respect of the monitoring programme within the monitoring and mitigation strategy. In para 2.2.2, TfL state they will use the most appropriate tool, which we would support, especially the use of a more specific modelling package (such as the transport study currently being prepared for the Canada Water Opportunity Area).
- 7.4 Para 2.3.3 discusses the establishment of a 'long list' of locations for consideration of localised impacts. The first criterion "*all links where one-way traffic flows are forecast to increase by more than 30% and by at least 120 vehicles per hour*" is considered to be excessively high and there is no known reference or basis for these figures. Certainly no justification was provided by the Applicant and the borough's transport expert knows of no proper basis for the use of these figures. The MMS Note proposes lower thresholds and these are welcomed if they are included in the final certified Monitoring and Mitigation Strategy document.
- 7.5 The second criterion "*all junctions that are forecast to experience an increase in aggregated delay of greater than 10 passenger car unit (PCU) hours*" is somewhat ambiguous as this will be influenced by the traffic levels and delays experienced by each vehicle. The figure may be reached

at locations with high flows experiencing short delays per vehicle or at locations with low flows experiencing longer delay per vehicle.

- 7.6 The third criterion “*Areas where local highway authorities have flagged a potential concern that are included in the initial traffic monitoring plan*” is unclear and perhaps indicates an opportunity for roads within Southwark to be added to the list. The document must be re-worded to be specific and capable of being readily understood. At present, it is unclear whether local authorities have scope to flag additional concerns or whether the criterion is limited only to those routes which have already been assessed and are already included within Appendix A. LB Southwark has flagged concern over particular routes in their borough and as such consider these should be included within the pre-scheme assessment, regardless of meeting any other criteria.
- 7.7 At the ISH on 28 March, the applicant said that the above thresholds applied to the scheme identified 60 locations for traffic monitoring and this number was considered by TfL to be reasonable. LB Southwark does not feel that this is an appropriate method of setting thresholds. Sites should be included based on their sensitivity / scheme effect rather than a cap on the number of sites.
- 7.8 LB Southwark have raised specific issues relating to the Monitoring and Mitigation Strategy throughout the process, these are set out below for clarity where issues / concerns remain following TfL’s MMS Note (contained in Appendix C) these primarily relate to Appendix A of the Monitoring and Mitigation Strategy document;
- LB Southwark has consistently requested routes/locations to be monitored as part of the traffic/transport monitoring by TfL. These have been set out in written submissions and orally at ISHs throughout the examination. The full list requested is set out in the table at the bottom of the TfL MMS Note at Appendix C of this submission.

- Road Safety needs to be monitored on all routes not just the tunnels. LBS consider that the scheme could alter traffic composition and that road safety could be affected by more than purely vehicle numbers. This is especially important on the A200 corridor where the Cycle Super Highway 4 is proposed to run.
- Journey time reliability on local roads. LB Southwark considers this must be monitored; the fact local roads may be outside LCAP areas is unreasonable justification for not monitoring.
- Journey time reliability for buses. TfL need to develop a mechanism to enable this monitoring and provide a commitment to undertake this.
- Impacts for peak and inter peak hours need to be assessed. LBS understand from the MMS Note that data will be available for each hour. This is welcomed and LB Southwark expects to see this in the final version of the document together with a commitment to set trigger points relating to peak hours.
- There is no commitment to monitor queue lengths, LB Southwark require this.
- The trigger points have been based on professional opinion but have not been related to any appropriate guidance. The Examining Authority must scrutinise these.
- Performance of bus routes travelling through the A2 corridor to be included in performance monitoring. LB Southwark understand that bus routes may change but do not envisage that the routes below will become less crucial, therefore they should be included as a minimum, these are;
  - 47 Newquay Road Liverpool Street Station
  - 188 North Greenwich Station Russell Square
  - 199 Canada Water Bus Station Catford Garage
  - 381 Peckham Bus Station County Hall

7.9 The issue of proportionality is still not taken into consideration nor is any detail provided on how this will be assessed. This is document wide comment and should be within both Chapter 2 (Pre scheme monitoring) and Chapter 4 (post scheme monitoring (section 4.6)). As stated at the

ISH, the document fails to consider how in-combination effects will be addressed. Within LB Southwark the anticipated growth of at least 20,000 new homes within the Old Kent Road opportunity area/action area will have a significant effect on traffic conditions. Currently this is not assessed and there is no provision for apportioning mitigation measures between schemes. In order for a plan or project to have an effect on LB Southwark of the scale proposed by the Silvertown Tunnel scheme, any second scheme such as the Old Kent Road development would not itself need to have the same overall scale of effect of the Tunnel in order to have a similar in combination effect in LB Southwark.

- 7.10 Para E3.3 – ‘TfL would then take appropriate steps to ensure the impacts of the scheme were not materially worse than those assessed in the Environmental Statement, for example through adjustments to user charging and the implementation of localised mitigation.’ However we feel that that ES does not reflect the usage of Rotherhithe tunnel and associated impacts therefore shouldn’t be used solely as a reference case.
- 7.11 The potential traffic/AQ mitigations included at D3, including the variability of the user charge, have not been proven to be feasible options for this scheme. For example, the user charge may be subject to political/socio-economic influences, and traffic signalling etc may not work on roads in the Boroughs, or in an effective or timely fashion. The list needs to be ‘bolder and proven feasible’ and effective.

## **AIR QUALITY**

- 7.12 The revised M&MS (document reference REP4-0460) rejects absolute air quality trigger metrics and places reliance on the opinions of an expert appointed by TfL, in consultation with STIG members. LB Southwark is extremely concerned that any appointment should be rigorously transparent and completely impartial.

- 7.13 In any case, LB Southwark is concerned that reliance on a single expert's opinion is not prescriptive enough. It leaves too much uncertainty with regards to what might be considered an impact that could be significantly different to that assessed in the ES and for which mitigation might need to be applied. There is also no indication of how the expert's opinion could be scrutinised and, if need be, challenged by STIG members.
- 7.14 TfL also states in the M&MS that mitigation measures will only be proposed if there is shown by the expert to be a "material worsening in air quality as a result of the scheme". Any proposed mitigation would then need to be approved by the Mayor. LB Southwark is concerned that TfL has not defined what a material worsening of air quality means and how this would be determined from the results of the assessed case.
- 7.15 The monitoring locations so far proposed by TfL do not cover all of those road corridors where LB Southwark has repeatedly requested air quality monitoring. While LB Southwark still considers the monitoring they have requested would be valuable, and as TfL has moved little in acknowledging this, the Council would be satisfied if additional monitoring was simply focused on the main area of concern to them. This is within the A200 one-way gyratory around Lower Road and Rotherhithe Old Road, which is an air quality focus area. The borough's position is that an air quality monitoring station should be located within this air quality focus area, in addition to the station on the A200 approaching the Rotherhithe Tunnel roundabout junction with the A101 and Jamaica Road, which was proposed by TfL in their recently revised M&MS.
- 7.16 LB Southwark would therefore be satisfied in respect of air quality monitoring if additional air quality monitoring was undertaken at the two locations within the A200 gyratory system shown on the map in Appendix D.
- 7.17 Appendix F – links to Ex-AQ5.4 - Usefulness of mitigation - In the document, TfL has tabled a number of mitigation measures that it

considerations could be applied if adverse air quality effects are triggered. However, LB Southwark is concerned that other than the charging scheme, which TfL has placed significant weight on, the measures are too broad to deliver the necessary effects where they are needed. The measures include signalling and road geometry changes, which LB Southwark considers might not be possible in the air quality hotspots within the borough that are of greatest concern. The council has requested that a feasibility assessment of the practicality of such measures is carried out at those locations where mitigation might be needed most.

7.18 With reference to Table A -1: Initial Mitigation triggers, there are concerns about the proposed triggers, in that some previously requested triggers are not included; and the values of the included triggers are not justified. There is also the overall concern that peak and compressed peak conditions are not considered, these are of primary concern to LB Southwark, they need to be monitored and assessed.

7.19 It is not clear how the percentage increases have been arrived at to determine an amber or red alert. We were expecting justification of these values at last deadline but none has been provided.

## **8. DRAFT DEVELOPMENT CONSENT ORDER (REVISION 4, EXA'S PROPOSED DCO AND REVISION 5.5)**

8.1 LB Southwark submitted detailed comments on the dDCO at Deadline 4 (section 4, document reference: REP4-018) and updated comments at Deadline 5 (section 3, document reference: REP5-009). These comments remain LB Southwark's views on the dDCO and request that these be read alongside this submission.

8.2 Oral submissions were made at the ISH on 29 March 2017 on some of the more significant of these points. TfL at the ISH explained that they were proposing to update the DCO for Deadline 6 and thus LB Southwark await

review of the updated DCO and reserve the right to provide final comments at Deadline 7.

Silvertown Tunnel Development Consent Order  
London Borough of Southwark: Post hearings submissions and further comments

## **Appendix A**

### **TfL Technical Note: Silvertown Tunnel – Public Transport Benefits in Southwark**

Dated 27 January 2017.




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<b>Author</b>	Hermann Maier	<b>Date</b>	27/02/2017
<b>Reviewer</b>	Elena Golovenko	<b>Version</b>	3
<b>Task</b>	<b>Silvertown Tunnel – Public Transport Benefits in Southwark</b>		

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**Question:**

*TfL to arrange for a more detailed explanation of the derivation of the Public Transport benefits set out for the London Borough of Southwark.*

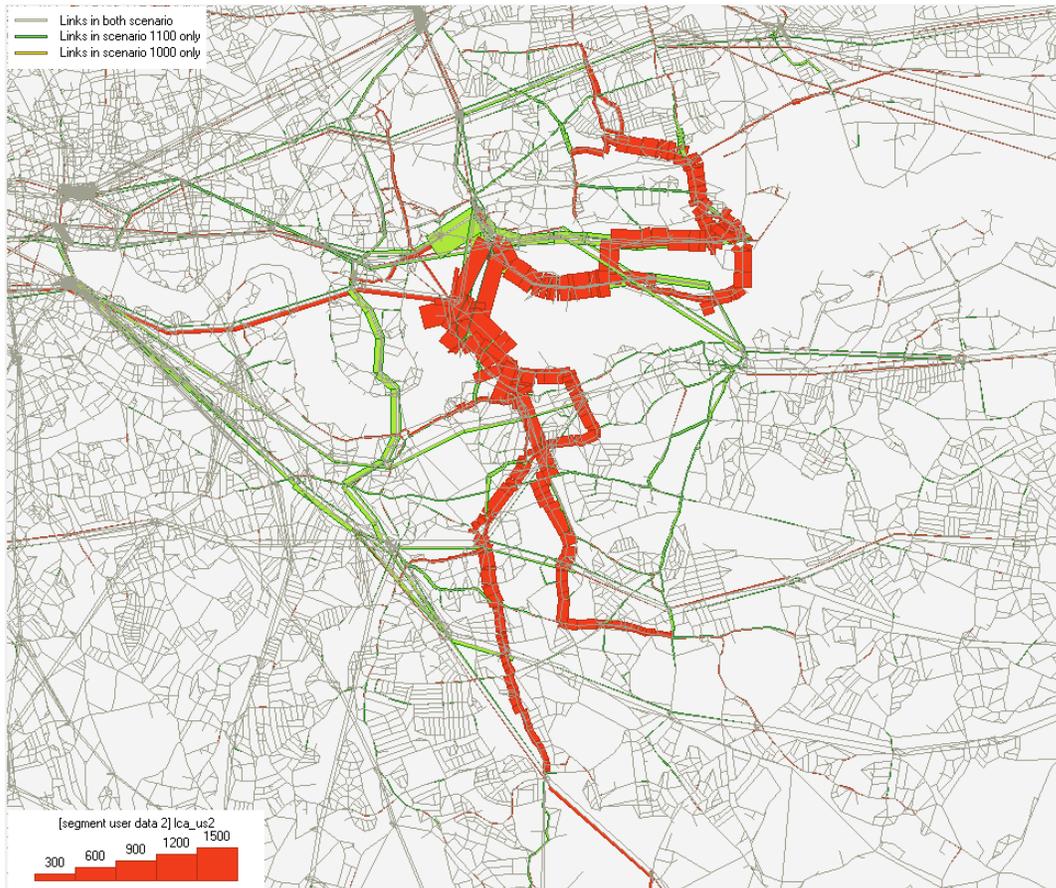
**Response:**

Table 3-1 of the Distribution of User Benefits Note (REP2-042) states that non-business public transport journeys starting in LB Southwark will receive £13.6m of time saving benefits as a result of the Scheme.

Compared to other Boroughs in East London, these benefits are relatively marginal. This conclusion is in line with expectations because the direct journey time benefits from the indicative network of new and enhanced bus routes would be very small for Southwark.

The majority of the benefit would come from an overall reduction in crowding relief, because the buses modelled enable some trips to be routed more directly across the river, reducing onward demand on rail services to London Bridge or on the Jubilee Line. Although this will be relatively minor for individual movements, the changes to the overall travel will form a comparatively large proportion of benefits in the borough.

The diagram below shows changes in PT flows in the morning peak, with green lines representing reductions in demand, and gives some indication of how these crowding benefits might arise for users of rail lines into/out of London Bridge.



### Appendix A - Methodology

The overall public transport generalised cost benefit is calculated using the standard WebTAG variable matrix appraisal formula:

$$\frac{1}{2} \times (T0 + T1) \times (P0 - P1)$$

Where:

- T0 represents the Do Minimum trips;
- T1 represents the Do Something trips;
- P0 represents the Do Minimum generalised cost;
- P1 represents the Do Something generalised cost;

and all these values are held, and calculations are undertaken, using an origin-destination matrix format.

The variable matrix benefits calculation can be disaggregated into benefits for existing users and new users, where the “rule-of-half” calculation applies to new users as follows:

- Existing users:  $T0 \times (P0 - P1)$
- New users:  $\frac{1}{2} \times (P0 - P1) \times (T1 - T0)$



The definition of generalised cost differs between in-work-time (IWT) and out-of-work time and is defined as follows:

- IWT: Uncrowded in-vehicle-time + walk time + wait time
- OWT: Crowded in-vehicle-time + walk time x 2 + wait time x 2.5 + boarding penalty

## **Appendix B**

### **Extracts from the draft Old Kent Road area action plan/opportunity area planning framework.**

These extracts of LB Southwark's draft Old Kent Road area action plan/opportunity area planning framework illustrate the commitment that LB Southwark and the GLA have made to the delivering both the plan and the minimum of 20,000 new homes.

# OLD KENT ROAD

LONDON BOROUGH OF SOUTHWARK

## Draft Area Action Plan / Opportunity Area Planning Framework

June 2016



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Join our  
**COMMUNITY**  
CONVERSATION

**Fairer future** ✓  
Reinvigorated neighbourhoods

*Southwark*  
Council

# 1.1 What is the Old Kent Road Area Action Plan/ Opportunity Area Planning Framework

- 1.1.1 The Old Kent Road Area Action Plan (AAP) is a plan to regenerate the Old Kent Road and surrounding area. It sets out a vision for how the area will change over the period leading up to 2036. This is supported by a strategy with policies we will put in place to achieve this vision, the reasons we have chosen the policies, and the delivery plan for implementing the vision.
- 1.1.2 The AAP will be part of our framework of planning documents. It will be a material planning consideration in deciding planning applications in the opportunity area. It will help ensure that we make decisions transparently, providing clarity for members of the public and giving more confidence to developers to invest in the area. It will also be an opportunity area planning framework (OAPF) and will be endorsed by the Mayor of London.
- 1.1.3 The document is structured as follows:
- Section 1 of the document introduces the document and the opportunity area.
  - Section sets out the vision and key diagram.
  - Section 3 outlines the area-wide strategy and policies which apply across for the opportunity area.
  - Section 4 applies the area-wide strategies to three smaller character areas as well as proposals sites.
  - Section 5 describes how the plan will be implemented.
  - The appendices provide further information on the policy context, the character and challenges facing the area, the implementation of the plan and the monitoring framework.

## 2.1 Vision

2.1.1 The regeneration of the Old Kent Road will be guided by our vision for the opportunity area.

Over the next 20 years the opportunity area will be transformed, becoming increasingly part of central London, providing at least 20,000 new homes and 5,000 new jobs. The making of a new piece of the city will be driven by the expansion of London's central activities zone and the construction of the Bakerloo line extension.

The Old Kent Road is at the core of the vision. It will be revitalised and restored as a thriving high street with shops, business space, leisure, civic, cultural and community uses on either side. Out-of-centre style retail parks and superstores will be replaced by development that provides strong, well-defined street frontages, making a better connected high street linking into neighbourhoods on either side. There will be new stations with excellent interchange with other modes of transport. The Old Kent Road itself will be transformed into a modern boulevard. Improved public realm for pedestrians, protection for cyclists and improved bus infrastructure along its entire length will help accommodate growth prior to the Bakerloo Line extension opening.

Behind the Old Kent Road there will be a transition from single use industrial and warehousing uses to mixed use neighbourhoods. These will be well served by new open spaces and green links. Development will be easy to move around for people walking and cycling with new buildings, clearly defined streets and squares. There will be tall buildings which will be well designed to form appropriate landmarks to mark routes around the area and focussing around new parks and improved public realm, and areas with more intense activity on the Old Kent Road. District heating solutions, sustainable urban drainage systems and measure to improve air quality will help tackle pollution and climate change.

New homes will help foster mixed communities and include a range of sizes and mix of private and affordable homes, including council homes.

The employment offer will build on the area's current diversity and include a new office quarter in the north of the area and a mix including flexible, hybrid, workshop, studio spaces and light industrial premises providing accommodation for businesses servicing central London's economy in the middle and south. New workspace, which includes affordable provision, will also help reinforce the area's growing reputation for arts and cultural activity.

Alongside homes and jobs, development will also provide new schools, health and other facilities which support growth and contribute to creating and reinforcing sustainable and healthy neighbourhoods. The plan sets out a comprehensive place-making approach for this significant part of London and the council is committed to working with the local residential and business community, landowners, developers and other public sector bodies to implement it.

## 3.2 Quality affordable housing

- 3.2.1 The opportunity area has huge potential to provide homes that Southwark and London need. A range of market, private rented and affordable homes with a mix of sizes will help meet local needs and also maintain mixed and diverse neighbourhoods. Residential neighbourhoods will feel like central London with high densities which benefit from improved public transport and proximity to local facilities including shops, workplaces and schools.

### AAP 2: New homes

Development in the opportunity area will provide at least 20,000 new homes over the period 2015-2036.

#### Reasons

- 3.2.2 The opportunity area will establish new residential and mixed use neighbourhoods which look and feel like central London. New homes will be serviced by high quality infrastructure including new public open space, improved public transport services, schools and health services.
- 3.2.3 Southwark's Strategic Housing Market Assessment identifies a local need to provide between 1,472 and 1,824 homes per year over the period up to 2031. This sits within a London-wide housing need for 49,000 new homes per year across the capital. New homes in the opportunity area will contribute towards meeting this need. To help create sustainable and mixed neighbourhoods, it is important that a mix of housing is provided. In accordance with the New Southwark Plan over 60% of homes will have two or more bedrooms and 20% will have 3 or more.

### AAP 3: Affordable homes

Development providing 10 or more new homes will provide a minimum of 35% affordable housing, subject to viability, in accordance with the New Southwark Plan.

#### Reasons

- 3.2.4 Affordable housing is an essential ingredient of a balanced and sustainable community. Approximately half of our housing need is for new affordable homes. Building 20,000 new homes will significantly contribute towards meeting local affordable housing needs to enable local people on lower incomes to maintain valuable social support networks and undertake some of the essential, but often lower paid, employment which underpins the local and regional economy.

## **Appendix C**

### **TfL's note to LB Southwark on the Monitoring and Mitigation Strategy**

Provided by TfL 4 April 2017.

M&MS	General comment / query	Response
Para 2.3.3	Clarification is required on how the thresholds have been set; the 30% and 120 vph threshold seems high	<p>These thresholds are proposed for the purpose of identifying a long-list of potential locations for which mitigation measures may be required pre-opening of the scheme. All locations for which one or more of the thresholds apply will be added to the long-list.</p> <p>The first bullet applies to highway links and was adopted for the proposed Thames Gateway Bridge scheme. 120 vph represents approximately 10% of a link's capacity in an urban environment. In response to concerns that the threshold is too high, we have reviewed these thresholds using the Assessed Case and it is planned to reduce this to 15% and 60 vph.</p> <p>The second bullet applies to junctions and was adopted for the 'example' assessment set out in Appendix C of the Transport Assessment. 10 PCU hours is 600 PCU minutes, and assuming a total junction flow of some 1200 vehicles (far exceeded in most strategic network junctions), this would imply an additional delay of some 30 seconds, which was regarded as a reasonable threshold for the scheme.</p>
App. A / App E.2.1	Impacts need to be assessed for peak and inter peak hours	This is the intention for all traffic monitoring - traffic data for each specified link will be collected over a 24-hour period, with data available for each hour within this period enabling the data to be broken down into peak periods. This will be clarified in the updated M&MS for DL6.
Para 3.7.4	Co-location of traffic and air quality monitoring points	<p>The AQ monitoring points have been informed by the likely impacts of the scheme as reported in the ES and the updated AQ and health assessment. The scheme is unlikely to have a material impact on AQ without also having an impact on traffic beyond what was predicted in the refreshed assessment, and it is not necessary to undertake monitoring on all roads on the network to determine whether the scheme is operating as expected. AQ monitoring will not be capable of picking up very small changes in AQ attributable to traffic, and there are small changes from year to year caused by variations to meteorological conditions. Furthermore, at various locations traffic will be monitored by periodic surveys rather than continuously, and in these instances co-located AQ monitoring would provide very limited insight.</p> <p>At sites which are not expected to experience material changes in traffic conditions it is much more likely that any AQ impacts will be the result of other, unrelated activities. Differentiating the effects on AQ will be a complex process which will require expert input, and for the reasons above it is not proposed to monitor AQ at all sites for which traffic is monitored.</p>
App. E.5	There are concerns about the proposed triggers and values of the included triggers are not justified. Trigger points for the following should be included; <ul style="list-style-type: none"> <li>Journey time reliability on local roads</li> <li>Journey time reliability for buses and general traffic should be assessed separately</li> <li>Road safety on all roads.</li> </ul>	<ol style="list-style-type: none"> <li>Journey time reliability statistics will be obtained from TfL's London Congestion Analysis Project (LCAP), for which data is derived from a network of ANPR cameras. These cameras are concentrated on the TLRN which means that it is not possible to monitor JTR on local roads.</li> <li>Journey time reliability for buses is currently planned to be identified through the excess wait time (EWT) metric, and thus buses will be measured separately to general traffic. TfL is currently investigating the use of bus JTR data as a metric for monitoring buses, and if this becomes the standard metric for bus evaluation this will likely be adopted for the triggers subject to agreement with STIG members.</li> <li>Road safety impacts will be monitored through the collation of KSIs along all specified links in the traffic management plan (KSIs being the focus of the Road Safety Action Plan) and this will be reported in the monitoring reports. The road safety triggers will be set for the Blackwall and Silvertown tunnels (i.e. the new highway infrastructure and junction tie ins). It is not considered appropriate to set triggers for other links because the scheme is not expected to have a material impact on road safety elsewhere and significant changes in traffic would be required to have an impact on KSIs.</li> </ol>
App. E.5	Justification for the percentage increases / how these have been arrived at to determine an amber or red alert.	The mitigation triggers have been set with regard to the forecast change brought about by the scheme (i.e. the change between the 2021 reference and assessed cases) and in some cases include an allowance for forecasting range / measurement error as explained in Appendix E of the M&MS. The levels for amber and red alerts are subjective, but in both instances have been set to ensure the triggers are tight and will be activated in the event of impacts being notably different from those forecast. Account also needs to be taken of general variability across the network and background growth; several potential options have been identified for doing so and this will be agreed at a later date.

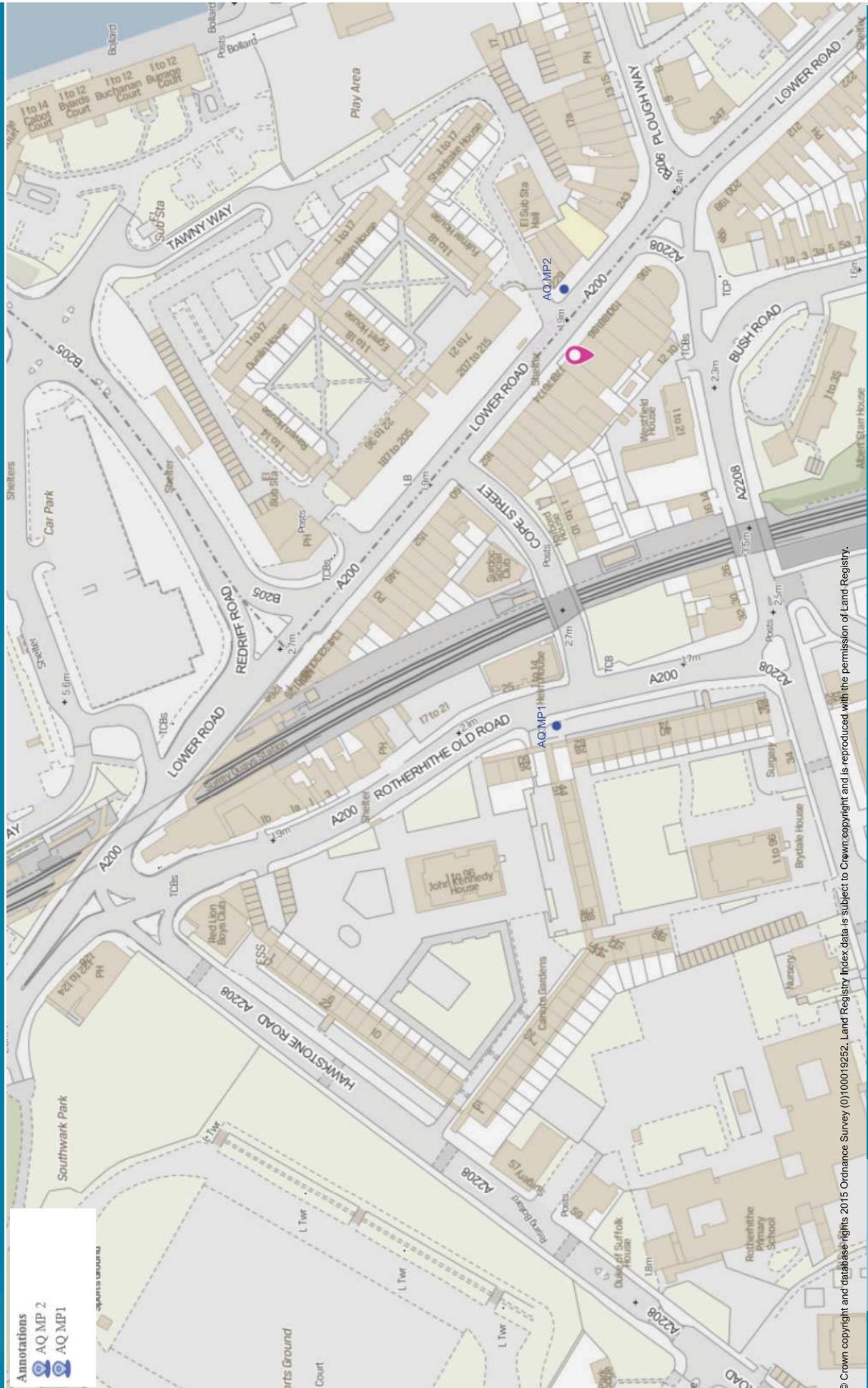
Source	Request	Response
LB Southwark (email 31 March)	<i>Journey time reliability needs to be monitored on the A2 corridor, journey time reliability for buses and general traffic should be assessed separately</i>	The M&MS will be amended to make clear that JTR will be monitored on the A2 corridor between the A102 and Tower Bridge Road. As explained above, bus performance will be monitored using the EWT metric and TfL is currently considering the use of bus JTR data as a metric for monitoring buses.
	<i>Include queue lengths in the monitoring of Rotherhithe tunnel – this is somewhat covered in the junction monitoring. Is there a reason why Woolwich Ferry has queue lengths and no other river crossing?</i>	The monitoring of queue lengths rather than journey times has been specified at the Woolwich Ferry due to the variable operation of this service; journey times would not be an appropriate measure of performance since queuing will be the main variable component of journey time. For other crossings, journey time represents the more appropriate metric to measure effects and it is not proposed to monitor queue lengths.
	<i>Include j/w Surrey Quays Road/Lower Road and Lower Road/Bush Road in the monitoring</i>	Given the concern raised by both LBS and LBL regarding the A200, both junctions will be included in the traffic monitoring plan in the M&MS submitted for DL6. Confirmation is requested that the latter junction is the Bush Road j/w Rotherhithe New Road (rather than Lower Road/Bush Road).
	<i>We have asked for monitoring of cyclist movement along the A200 corridor (as they have been the largest mode growth) – why can't these be considered as part of the traffic monitoring?</i>	Cyclist movements are not expected to be impacted this far from the scheme. It is planned that traffic flow data will be collected through the use of ATCs or other automated forms of counting (e.g. radar surveys), and cyclist movements cannot be accurately picked up by these survey techniques.
	<i>Performance of bus routes – those travelling through the A2 corridor on bus may be impacted by the increase in traffic on the corridor and therefore we feel that it is reasonable that bus routes on adjacent corridors be included in performance monitoring. This includes: Route Start Finish 47 Newquay Road Liverpool Street Station 188 North Greenwich Station Russell Square 199 Canada Water Bus Station Catford Garage 381 Peckham Bus Station County Hall</i>	It is planned that cross-river and non-cross-river bus routes (on the network adjacent to the Blackwall and Silvertown tunnels) will be included in the monitoring. Given the changes that are expected to the network as a result of the scheme it is planned that details of the routes to be monitored (and the start/end points) would be agreed nearer to the time of opening in consultation with STIG members.
	<i>There should be air quality monitoring on the A200 within the air quality focus zone, which the present location adjacent the Rotherhithe Tunnel does not address. As discussed when we met in 22 February 2017, we discussed our concerns with the use of the Silvertown model in the refreshed case given the borough's concerns with the validation of the A200 corridor and we felt other modelling packages, the modelling suite for the Canada Water Opportunity Area for example may be more appropriate. We proposed a separate legal agreement could be a way of providing detail and agreement on the methodology of monitoring, approaching the refreshed case, resolving the air quality monitoring station issue above and to agree mitigation approaches. You said you would take this back to the team and we'd appreciate a response asap on this. This will enable me to ask my legal department of start putting this together.</i>	<p>AQ monitoring is planned on the A200. Details of the AQ focus zone awaited from LBS.</p> <p>TfL has considered LBS's proposal that a separate legal agreement be used to provide detail and agreement on the methodology of monitoring, approach to the refreshed assessment and to agree mitigation approaches. TfL's approach has always been and still remains, to include an appropriate level of detail in the M&amp;MS to govern the approach to monitoring and mitigation. The approach to completing the refreshed assessment is set out in section 2.2 and this includes reference to engagement with STIG. To the extent that we reach agreement, all the issues raised can be dealt with through the certified document apart from any financial contribution towards the use of borough AQ data.</p> <p>In our view, the monitoring strategy is not dependent on borough data. Obviously if a borough were to make that available then it could be included in the analysis but it is not essential. Therefore, we don't consider it necessary to enter into a separate legal agreement at this stage.</p>

Silvertown Tunnel Development Consent Order  
London Borough of Southwark: Post hearings submissions and further comments

## **Appedix D**

### **Plan of LB Southwark's required air quality monitoring locations**

- Annotations
- AQ MP 2
  - AQ MP 1



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50 m

Scale = 1:1250

3-Apr-2017

