

HSE comments on TfL document TRO10021: Assessment of Risk and Changes to Exposure Levels arising from the Proposed Extension to the existing A102 Blackwall Tunnel Southern Approach

HSE wishes to comment on this document submitted by TfL for Deadline 6 and published on 6/4/17.

HSE is not in a position to advise on traffic modelling, as this is not within its area of expertise. HSE notes, however, that nowhere in this document is there any consideration of a hazardous event at either Brenntag Inorganic Chemicals Ltd or the East Greenwich Gasholder Station. Credible and ongoing hazardous event scenarios from these sites could impact on the road and the flow of traffic (e.g. causing traffic jams), but have not been taken into account i.e. TfL's assessment has omitted to address this important point which significantly undermines their conclusions.

HSE also disagrees with the way TfL's report interprets Rule 4b for extensions to existing developments. The proposal seeks to increase the number of lanes from 5 to 8 which in the circumstances of stationary traffic will increase the population at risk by more than 10%.

HSE does not recognise anything in the TfL report that causes it to change its position.