

## Silvertown Tunnel Development Consent Order

## London Borough of Southwark

## Deadline 7 submissions

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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. The final deadline for submissions to the examination is this deadline, Deadline 7, 10 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 At Deadline 6, LB Southwark submitted its Deadline 6 submissions titled ‘Post-hearing submissions and further comments’ (document reference: REP6-024), which set out the Council’s most up-to-date position on the Silvertown Tunnel application. TfL has only put forward minimal changes through their Deadline 6 submissions and the majority of these do not address LB Southwark’s concerns. Where a concern has now been addressed or where LB Southwark has comments on TfL’s Deadline 6 amendments, this is set out below. Where there are no further comments below, the comments as per LB Southwark’s Deadline 6 submissions remain. Both documents (and the documents referred to in LB Southwark’s Deadline 6 submissions) should be considered by the ExA and Secretary of State in their respective recommendations and decisions on the DCO.

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

- 2.1 As TfL has acknowledged throughout the examination, one of the key benefits of the Silvertown Tunnel Scheme is enhanced public transport provision, particularly bus services. The Bus Strategy and DCO do not ensure delivery of this benefit. LB Southwark's comments in previous submissions have not been addressed adequately and the borough's concerns on bus provision remains as per these submissions.
- 2.2 TfL has now proposed some amendments to the Bus Strategy Revision 1 (REP6-067) at Deadline 6. LB Southwark's additional concerns on the Bus Strategy in respect of some of the amendments are set out below.
- 2.3 Commitment 5 has been amended to remove the reference to a minimum of 20 buses per hour and to cross refer to the requirement in Schedule 2 of the DCO which requires bus provision for the duration of the monitoring period only. For the reasons set out in paragraphs 4.7 and 4.8 of this submission on the dDCO, LB Southwark object to this change to both the Bus Strategy and requirement 13(1).
- 2.4 Commitment 7 has been amended to refer to TfL consulting STIG members on its outline proposals for the bus network. Notwithstanding LB Southwark's comments in section 4 of this submission on Article 65, Southwark is supportive of this change to Commitment 7.

## **3. MONITORING AND MITIGATION STRATEGY**

- 3.1 TfL has proposed some updates to the Monitoring and Mitigation Strategy Revision 1 (document reference REP6-068). Many of LB Southwark's points have still not been addressed and these remain as per the Deadline 6 and previous submissions.

- 3.2 LB Southwark's comments on the relevant updated sections are as follows.
- 3.3 LB Southwark has previously raised concern with paragraph 2.3.3 of the Monitoring and Mitigation Strategy in relation to the establishment of a 'long list' of locations for consideration of localised impacts. Whilst still not made clear in TfL's Monitoring and Mitigation Strategy, it is understood from TfL that only one of the three criteria needs to be met. This should be specified in the Strategy.
- 3.4 TfL's updated Monitoring and Mitigation Strategy addresses some of LB Southwark's concerns with paragraph 2.3.3. Firstly, the first bullet point has been amended to refer to traffic flow increases by 15% and 60 vehicles per hour. This amendment is an improvement on the previous version of the Monitoring and Mitigation Strategy.
- 3.5 The third criterion "*Areas where local highway authorities have flagged a potential concern that are included in the initial traffic monitoring plan*" remains unclear and perhaps indicates an opportunity for roads within Southwark to be added to the list. It remains 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 of the Monitoring and Mitigation Strategy. LB Southwark has flagged concern over particular routes in their borough and as such considers these should be included within the pre-scheme assessment, regardless of meeting any other criteria.
- 3.6 Paragraph 2.3.4 of the Monitoring and Mitigation Strategy inserts some additional wording to state "*As part of this process a detailed review of the outputs from the strategic transport modelling will be undertaken for each location*". LB Southwark objects to this as the borough has concerns with the model and thus is not happy with it being used to determine the locations for monitoring.

3.7 TfL has inserted new sections into the Monitoring and Mitigation Strategy to refer to '*mitigation at adjacent crossings*' in paragraphs 5.2.5 and 5.2.6. These paragraphs set out that TfL would consider the implementation of a user charge at adjacent crossings. As the two closest (currently free) crossings are located in LB Southwark then these are likely to be impacted (as shown within TfL's modelling). This has not been discussed as part of the DCO, nor through separate discussions with the borough in any detail. As demonstrated by the Silvertown Tunnel project, user charging can significantly affect people's travel patterns given the usage of the borough's road network, LB Southwark must be engaged in any discussion about user charging in the borough.

3.8 Appendix A has been updated to assess impacts for each hour as opposed to 24 hour data. This update is welcomed.

### **AIR QUALITY**

3.9 Since LB Southwark's Deadline 6 submissions, TfL has said that in answer to the borough's requests for air quality monitoring, it would provide monitoring along the road corridors of principal concern. This is within the one-way gyratory of the A200, around Rotherhithe Old Road and Lower Road. Discussions are ongoing as to the location of the gyratory monitoring location on Lower Road, which TfL recommended be moved from LB Southwark's preferred location due to potential conflict with emissions from an adjacent bus stop. The attached plan at Appendix A to this submission sets out the location at Zapotec House, Lower Road and this has been provisionally agreed as the monitoring station in the Lower Road gyratory (DT26) between TfL and LB Southwark. From discussions between Deadlines 6 and 7 it is understood that TfL has provisionally agreed to this and it will be included within their Deadline 7 final Monitoring and Mitigation Strategy.

3.10 LB Southwark also appreciates that in their Post-hearing Submission Document (REP6-073), in answer to Question 5.2 on page 26, TfL acknowledges that the M&MS is not fixed and will be revised if necessary following the refreshed assessment prior to scheme opening. TfL makes it

clear that a revision to the M&MS will be applied if impacts are found in the key locations requested by the neighbouring boroughs (i.e. including Old Kent Road, New Kent Road and Tower Bridge in Southwark ), which LB Southwark welcomes.

3.11 However, notwithstanding the above, LB Southwark remains concerned that the fundamental methodology of the air quality assessment is not robust and relies on uncertain traffic data.

3.12 LB Southwark also notes in TfL's Post-hearing Submission Document (REP6-073) that Figures 24 to 27 of the 'Development Consent Order Application Response to ExA's Second Written Questions: Traffic and Transportation' suggest that traffic impacts throughout Southwark, particularly along the A200 and through the Rotherhithe Tunnel are marked, in green, as being 1,000 vehicles AADT. This exceeds the DMRB air quality screening criterion used by TfL and appears to contradict their previous assertions that impacts would be below this. This compounds LB Southwark's concerns with regard to the robustness of the traffic and air quality assessments, and hence to the conclusions drawn from them.

#### **4. DRAFT DEVELOPMENT CONSENT ORDER**

4.1 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). Oral representations were also made at the relevant ISH hearings. LB Southwark's Deadline 6 submissions (document reference: REP6-024) clarified that these comments remain LB Southwark's views on the dDCO.

4.2 TfL propose some further amendments to the dDCO at Deadline 6 in their dDCO Revision 5 (document reference: REP6-038) and LB Southwark's concerns and objections on some of these amendments are set out below.

Article 65: Silvertown Tunnel Implementation Group

- 4.3 TfL's Deadline 4 dDCO Revision 4 (document reference; REP4-025) proposed to remove the obligation within Article 65 for TfL to consult all of STIG members on its proposals for cross river bus services. LB Southwark set out its concerns with this in its Deadline 5 written submissions, its oral representations on 29 March 2017 and its Deadline 6 written submissions.
- 4.4 TfL's dDCO Revision 5 (document reference:REP6-038) subsequently amends Article 65 to state that TfL must consult the members of STIG on a number of matters including;

*“Article 65 (5)(b) the proposals for the initial bus services that will operate through the tunnels when the Silvertown Tunnel opens for public use;”*

- 4.5 Whilst this wording is an improvement on the dDCO Revision 4 (document reference: REP4-025) wording it does not go far enough to address LB Southwark's concerns. It is of concern to LB Southwark that TfL will only be required to consult STIG for the initial bus services and not any subsequent proposals for bus services. LB Southwark request that the DCO wording is amended to be clear that STIG should be consulted on both the initial bus services and the bus services for a minimum of three years after the tunnel has opened to traffic. Three years is an appropriate period to include within Article 65 as this is the minimum monitoring period proposed by the dDCO and Monitoring and Mitigation Strategy. This would also be consistent with the initial wording proposed by TfL in earlier versions of the dDCO and would ensure that STIG members are effectively consulted on an issue as important as bus provision throughout the monitoring period.

*Schedule 2: Requirement 13*

- 4.6 LB Southwark's detailed comments on this requirement are already set out in existing submissions. These concerns remain.
- 4.7 In addition, TfL's Deadline 6 dDCO Revision 5 (REP6-038) proposes a further amendment to Requirement 13(1) to require TfL to "...secure the provision of not less than 20 buses per hour during peak periods in each direction through the tunnels ~~from the date on which the Silvertown Tunnel opens for public use~~ for the duration of the monitoring period..."
- 4.8 LB Southwark questions this amended wording as the minimum 20 buses per hour should not just be for the minimum three year monitoring period. This is of significant concern as, notwithstanding LB Southwark's existing comments that that the DCO should specify a minimum of 37.5 buses per hour as per the Assessed Case, the minimum number of buses should not be required for only the monitoring period. It is a concern that bus numbers may therefore reduce after this, which would reduce the public transport benefits that the scheme claims to be delivering and which are part of TfL's objectives and priorities for the scheme. See also LB Southwark's comments on the Bus Strategy in section 2 of this submission.

Silvertown Tunnel Development Consent Order  
London Borough of Southwark: Deadline 7 submissions

## **Appendix A**

Zapotec House, Lower Road air quality monitoring location.