

Committee: Planning and Transportation	Date: 7 February 17
Subject: Silvertown Tunnel development consent order: routeing of dangerous goods through Central London	Public
Report of: the Director of the Built Environment	For Decision
Report author: Craig Stansfield, Transport Planning and Development Manager Department of the Built Environment	

Summary

Transport for London is proposing to build a new road tunnel under the River Thames, between the Greenwich Peninsula in South London and Silvertown in East London, in order to provide additional crossing capacity and relieve traffic congestion, particularly through the Blackwall Tunnel, which the new tunnel would effectively duplicate. Transport for London's original proposal was to build a tunnel capable of safely conveying all dangerous goods that may be legally carried on a road vehicle. They have since revised their proposal to a tunnel incapable of safely conveying any dangerous goods. This means that the current situation would continue even when the Silvertown Tunnel opened. Dangerous goods that need to be carried across the River Thames will still be driven into Central London; in order to use the Thames road bridges. A significant potential benefit of the Silvertown Tunnel has therefore been removed from the scheme.

An examination by the Planning Inspectorate of the development consent order for the Silvertown Tunnel scheme is in progress, but is reaching its conclusion. Member authority to support the written representations, already submitted to the examination, is now required.

Recommendation

Members are asked to:

- a) Authorise the representations made to the examination into the proposed Silvertown Tunnel that seek a tunnel that can safely convey dangerous goods, thereby limiting the number of vehicles carrying dangerous goods that are routed through Central London.
- b) Authorise the Director of the Built Environment to make any further submissions and sign a Statement of Common Ground with the promoter (Transport for London)

Main Report

Background

1. Transport for London is proposing to build a new road tunnel under the River Thames, between the Greenwich Peninsula in South London and Silvertown in East London, in order to provide additional crossing capacity and relieve traffic congestion, particularly through the Blackwall Tunnel, which the new tunnel would effectively duplicate. The two tunnels would share the same approach roads along the Greenwich Peninsula. The proposed tunnel is known as the Silvertown Tunnel.
2. Transport for London's original proposal was to build a tunnel capable of safely conveying all dangerous goods that may be legally carried on a road vehicle. This is a tunnel categorized as a category A tunnel in terms of the United Nations' ADR* regulations. They have since revised the proposal to a category E tunnel, which is a tunnel incapable of safely conveying any dangerous goods. This means that the current situation of dangerous goods that need to be carried across the River Thames being driven into Central London in order to use the Thames road bridges would continue even when the Silvertown Tunnel opened. A significant benefit of the proposed Silvertown Tunnel has therefore been scopped out of the scheme.
3. Since the Silvertown Tunnel scheme was de-scoped your officers have engaged in extensive liaison and correspondence with Transport for London's officers, including directly meeting the Managing Director, Surface Transport, in order to try to persuade Transport for London to reverse their de-scoping decision. This process has allowed both organizations to understand each other's concerns and positions better. However, this liaison and engagement has unfortunately not resulted in the restoration by Transport for London of a category A tunnel and a category E tunnel is currently the subject of the development consent order that Transport for London has put before the Planning Inspectorate for examination.
4. In determining whether or not it would be appropriate to recommend to your Committees that the City makes representations to the examination seeking to have the proposed tunnel categorization restored to category A, officers have felt it necessary to first obtain at least some evidence of the extent of the existing problem of dangerous goods being routed through Central London. Regrettably (and rather surprisingly), Transport for London appear to have taken the decision to de-scope the proposed Silvertown Tunnel without the benefit of any data about dangerous vehicle movements.
5. At a meeting with Transport for London on 22 September 2016 your officers obtained Transport for London's agreement to undertake some limited surveying of existing dangerous goods movements to allow the City and Transport for London to reassess whether or not the decision to de-scope the tunnel to a category E tunnel was the appropriate one. This survey was not

* ADR: *Accord Européen Relatif au Transport International des Marchandises Dangereuses par Route*

undertaken by TfL until 9 November 2016, after the examination by the Planning Inspectorate had commenced, and the results were not provided to the City by Transport for London until 29 November 2016. In addition, the survey data have not included vehicles conveying dangerous goods using Blackwall Tunnel, the most relevant survey location for assessment of the proposed Silvertown Tunnel, nor those using Tower Bridge, as this bridge was closed to vehicle traffic for major planned maintenance works at that time, and the survey encompassed only a single 12-hour period (7 a.m.–7 p.m.) on a single day (Wednesday 9 November 2016), which even Transport for London concede “may not be truly representative”. Despite this limited sample, hundreds of vehicles plated as carrying dangerous goods were observed.

Current Position

6. An examination by the Planning Inspectorate of the development consent order for the Silvertown Tunnel scheme commenced on 11 October 2016. Hearings are taking place principally at ExCeL in Canning Town.
7. Your officers have carefully considered the reasons given by Transport for London for its change in the proposed tunnel categorization with the benefit of the limited survey data now available. These reasons are set out in the e-mail from Transport for London’s Managing Director, Surface Transport, which forms Appendix 1 to this report. Your officers do not consider that Transport for London’s reasons constitute an appropriate justification for the de-scoping of the Silvertown Tunnel scheme and for continuing to route dangerous goods through the City and the rest of Central London. Officers’ responses to Transport for London’s reasons for its de-scoping of the Silvertown Tunnel are given in Appendix 2 to this report.

Options

8. As the development consent order examination is underway, the City’s two remaining options are to accept Transport for London’s decision to downgrade the tunnel to a category E tunnel or to make representations to the examination into the development consent order seeking to have a category A tunnel reinstated. Accepting the category E tunnel would result in the continuation in perpetuity of dangerous goods being routed through the City of London and the rest of Central London so that the conveying vehicles can use the Thames road bridges, particularly Tower Bridge and London Bridge. On the other hand, the City Corporation can oppose the tunnel design and categorization that have been put before the Planning Inspectorate for examination.

Proposal

9. It is recommended that the City objects to the proposed tunnel design and categorization in order to try have the tunnel restored to a category A tunnel, thereby limiting the number of vehicles carrying dangerous goods that are routed through the City and the rest of Central London.

Corporate and Strategic Implications

10. Engaging with Transport for London and the Planning Inspectorate over the Silvertown Tunnel development consent order in order to achieve the best result for London and maximize the benefits of the Silvertown Tunnel scheme for all of London conforms to the *City of London Corporate Plan 2015-19* key policy priority KPP3: “Engaging with London and national government on key issues of concern to our communities such as transport, housing and public health”. The routing of dangerous goods through Central London is a significant matter in terms of both transport and public health.

Implications

11. Accepting the substandard tunnel would result in the continuation in perpetuity of the highly unsatisfactory situation of dangerous goods being routed through the City and the rest of Central London in order to use the Thames road bridges, particularly Tower Bridge and London Bridge. On the other hand, the City of London objecting to the tunnel design and categorization would not be welcomed by Transport for London.

Health Implications

12. Routing dangerous goods through the City and the rest of Central London represents a significant risk to public health.

Conclusion

13. Transport for London’s decision to downgrade the proposed Silvertown Tunnel to a category E tunnel, incapable of safely conveying any dangerous goods, means that the current situation of dangerous goods that need to be carried across the River Thames being driven into Central London in order to use the Thames road bridges would continue even when the Silvertown Tunnel was opened. This has significant safety and public health implications for the City and Central London and therefore it is recommended that the City objects to the proposed tunnel design and categorization.

Appendices

Appendix 1: e-mail from Transport for London’s Managing Director, Surface Transport

Appendix 2: officers’ response to Transport for London’s statement of reasons

Contact:

Craig Stansfield
Transport Planning and Development Manager
Department of the Built Environment
telephone: 07802 378 810
e-mail: craig.stansfield@cityoflondon.gov.uk