

# **Planning Act 2008 (as amended) – Section 55**

## **Application by Transport for London for an Order Granting Development Consent for the Silvertown Tunnel**

### **Adequacy of Consultation Request**

**FAO: Emre Williams, Case Officer, The Planning Inspectorate, 3/18 Eagle Wing, Temple Quay House, 2 The Square, Bristol BS1 6PN.**

Dear Sir

The London Borough of Waltham Forest believes that TfL have not consulted adequately on the Silvertown Tunnel scheme. We submitted our initial comments on the scheme on 27<sup>th</sup> November 2015 with our prime concern being the validity of the reference case traffic modelling used to justify the scheme. To quote from our submission:

“Our primary concern is that the new tunnel will increase traffic, congestion and air quality problems on the approach roads to the tunnel including the A12 and other local borough roads such as High Road Leytonstone, Church Road and Orient Way. TfL traffic modelling, which shows reduced traffic on these roads, is highly misleading as it is based upon a comparison with a “reference case” for 2021 which passively accepts rising traffic on London’s roads as inevitable because of rising population and economic growth.

It is also unrealistic in that it does not take into account the way that traffic on approach roads to the tunnel is currently constrained by the capacity issues and current congestion at the tunnel. So it is unrealistic to expect that a ‘do nothing’ scenario would otherwise result in rising traffic levels to the extent predicted in ‘reference case’.”

Since then an independent audit of the modelling has been performed by Steer Davies Gleave but has not been made available to our borough. We understand that the audit report has been presented in draft form to the Boroughs who led the audit (Greenwich, Newham, Tower Hamlets, Bexley, Barking and Havering) but has not yet been finalised and is not yet available to “non-host boroughs” who potentially stand to suffer the impact of any increased traffic brought about by the scheme.

Waltham Forest Council does not, therefore, consider this consultation adequate unless this information is provided.

Regards

Tobias Newland

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