

Mr Peter Robottom  
The Planning Inspectorate  
3/18 Eagle Wing  
Temple Quay House  
2 The Square  
Bristol BS1 6PN

04/10/2016

Ref TR010021, Rule 6 Letter, Silvertown Tunnel

Dear Mr Robottom,

I am writing on behalf of the No to Silvertown Tunnel campaign, in response to your letter ref TR010021, dated 13 September 2016.

We appreciate that you have gone to some lengths to analyse the outline arguments, in order to develop plans for the investigation into the proposed Silvertown Tunnel.

We note that according to Annex C, none of the planned hearings will be held south of the river. We believe that this will disadvantage local residents, as the difficulty and expense of travelling to the Excel Centre may deter them from expressing their concerns over the scheme. This should be rectified with an open public hearing. In addition, we would ask that an issue-specific hearing be added to examine the possible effects on the World Heritage Centre at Greenwich, and its buffer zones. This should be held in Greenwich. We recognise that you are likely to make a site visit, but a hearing would bring out specific issues which could impact the area.

We would like to raise some further points regarding Annex B, the initial assessment of principal issues. The annex sets out most of the points we hope the Inspector will consider, but we would like clarification on elements that we believe deserve close attention.

Regarding item 7:

We ask that the Inspector includes relevant European policy directives, in addition to London and national policy documents. This would be consistent with the inclusion of European directives on air quality in item 1.

Regarding item 9:

a) We ask the Inspector to examine whether the applicant's proposed monitoring strategy is adequate to achieve the objectives being sought, alongside consideration of the mitigation strategy.

We appreciate the reference to mitigation of possible effects at critical junctions or links in the network. We would like to ask that the Inspector also reviews whether the applicant's mitigation strategy covers a large enough area, beyond the road systems to the immediate north and south of the Blackwall and proposed Silvertown Tunnels.

For instance, we believe consideration should be given to the effects on the A13 as far as Dagenham, where the flyover is already badly congested; on the North and South Circular roads; on the Kent-bound A2 through Eltham and Bexleyheath; and on the A20 through Sidcup.

In addition, we ask that the Inspector considers whether the applicant's proposal for monitoring and mitigation will be sufficient to maintain and improve traffic levels in sensitive centres for shopping and services such as Blackheath Village, where the B212 is already prone to congestion.

b) We appreciate that the Inspector must look at the proposal in question on its own merits. But in considering whether there has been adequate assessment of alternatives, we ask that the Inspector takes account the following:

- The lack of cross-Thames public transport alternatives in East and South-East London, bearing in mind that when public transport crossings have been added or enhanced in the past 20 years, regeneration and economic benefits have followed (eg, the construction of the Jubilee Line extension; the incorporation of the old East London Line tube line into the London Overground; and the benefits of Crossrail already being felt two years before it opens).
- Whether the effects of other schemes where planning permission has been given or construction has started have been properly taken into account. This is a particular issue by the A102 in Greenwich, where an Ikea store has been given outline planning permission in addition to an already-relocated Sainsbury's store and a retail park currently under construction at Brocklebank Road, Charlton. All of these will increase traffic demand on the road network surrounding the A102, making it harder for the scheme to achieve its objectives. Proposed and in-progress housing developments both north and south of the Thames will also affect traffic patterns, and should be reviewed in examining the applicant's modelling.

c) We ask that the Inspector studies the effects of construction on access to and from North Greenwich bus station, particularly at times when the O2 is holding events.

d) Finally, we ask that the Inspector examines the effects of improving access for heavy goods vehicles, which are currently restricted by the height of the Blackwall Tunnel. The effects of extra HGVs on the streets of Newham and Tower Hamlets, as well as surrounding boroughs such as Hackney and Waltham Forest, should be examined in relation to emerging London policy on deterring large lorries from entering London, making roads safer for cyclists and pedestrians, and the effects of HGVs on noise levels and air quality both south and north of the proposed tunnel.

Yours faithfully,

Anne Robbins  
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