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10<sup>th</sup> November 2016

Ref: Silvertown Tunnel Project (TR010021)

Dear Mr Peter Robottom,

**The East Greenwich Residents Association (EGRA) is a local residents association whose area borders the proposed Silvertown Tunnel development.**

EGRA would ask if its comments on the Silvertown Tunnel project (the Project) may be considered by the National Infrastructure Planning Inspectorate (NIPI). We realise that it is too late to be asked to be considered an Interested Party to the Project. We have, however, discussed the problem of our not submitting comments at the registration phase with Richard Price (telephone discussion, 1<sup>st</sup> November 2016) and received much useful advice to submit comments in as full a form as possible. We also point out EGRA's previous engagement in the pre-consultation process with TfL. After an initial pre-consultation submission in December 2014, we arranged a small meeting with TfL staff in March 2015 and a public presentation by a TfL staffer on 19 May.

We hope you may accept this submission from EGRA, its lateness entirely due to our own administrative issues and not with the consultation process which has been extensive and transparent.

#### **Outline of Comments**

EGRA would comment and ask further questions on five specific issues. We begin with the crucial issue of air quality, in part because this is the first in the project list and because we also view it as critical. That is followed by four other issues in what we think is a logical order:

- Air Quality, noise and other impacts
- Policy and objectives
- Redevelopment, urban renewal and other socio-economic benefits
- Transportation and traffic
- User charging

#### **Air quality, noise and other constructional or operational environmental impacts**

The Department of Transport's National Policy Statement for Ports (para 5.7.7) states that on air quality: 'In the event that a project will lead to non-compliance with a statutory limit, the decision-maker should refuse consent'. As Greenwich is within an Air Quality Management Area we believe that this policy guidance should apply to the Project.

An important argument for the Project is whether it will reduce or increase air pollution because of its impact on vehicle emissions.

- Studies undertaken by the Royal Borough of Greenwich, by TfL and by EGRA already show that air pollution breaches legal limits at sites close to the A102 (51-88 milligrams of NO<sub>2</sub> per cubic metre of air), Tunnel Avenue (47-65 milligram of NO<sub>2</sub> per cubic metre of air) & Trafalgar Road (29-88 milligrams of NO<sub>2</sub> per cubic metre of air).
- Whether increased traffic will significantly worsen air pollution or whether better traffic flows will improve it is not sufficiently established. Even taking the admitted increase in traffic of between 35 and 50%, it is unclear that this will be compensated by less idling traffic during peak demand.
- We understand that the AQ modelling included just one “real world” test and that much of the evidence is based on laboratory emission test data. We believe this is insufficient after overwhelming evidence of the disparity between the two types of test, especially that of diesel vehicle emissions.
- There are numerous studies which now link pollution to early deaths, these are now estimated to be about 9,500 a year in London (see “Lethal and Illegal”, Institute for Public Policy Research, 2016). Furthermore a high proportion of vehicle emissions of the toxins nitrogen dioxide and particulates are from diesel vehicles. It seems paradoxical to facilitate increased diesel vehicle traffic at a time when evolving policy is to attempt to constrain it, and maybe even to eliminate it in London.
- The Mayor of London has proposed to extend an Ultra Low Emissions Zone to the South Circular road. The Project would be within this zone if it were to be established. Has the effect of this been adequately modelled?
- There are a large number of schools and nurseries within East Greenwich and Peninsula Ward as a whole as well as a new school St Mary Magdalene, Peninsula being built next to the A102. Have the impacts on these and other “sensitive receptors” been adequately assessed?
- Noise levels due to additional traffic and the fact that the new tunnel is proposed to be able to accommodate larger HGVs which in themselves are noisier vehicles. There are not sufficient noise barriers or mitigation measures outlined in the plan

Further Questions:

- Have options to ban HGVs from using the Silvertown tunnel in line with the existing Blackwall Tunnels, but allow double decker buses through in a dedicated lane to ensure public transport cross river is improved been considered?
- Air quality adjustments should also be provided in different scenarios, what if traffic were 10% or 20% higher than the modelled scenario (as indicated by 1996 induced traffic survey) how quickly does air quality become materially affected under the modelling ie what is the margin for error at which it becomes detrimental to Air quality under this modelling?

**Policy and objectives**

Whilst an additional river crossing may be required and it is acknowledged that there are already major congestion challenges when the current Blackwall Tunnel is disrupted for any reason, by adding another river crossing in an area where the approach roads are already heavily congested will only make matters worse and not better. This, alongside other planned developments such as the Ikea, Charlton Retail Park, residential housing being built along the river front at East Greenwich & on the Peninsula as well as the Cruise Ship Terminal, will all add to traffic in the area and result in worsening congestion, not relief.

- We would argue that congestion would merely be displaced on to “the road network” and that it would be severe even with only a 35-50% increase in traffic.
- Resilience is important. We understand that about 700 incidents a year are caused by accidents or over-height vehicles at the Blackwall tunnels. These need to be addressed by better management not by duplicating tunnels. What future-proofing against such incidents are envisaged?
- Cross-river public transport links are at breaking point. Passengers on cross-river bus, tube and rail services are suffering far more disruption to their trips than those using the existing Blackwall tunnels. What serious investment will be made in public transport links to South East London and what measures to improve its resilience?
- The Project may benefit HGV movements (especially from the London Gateway Port to Europe), taxi trips to City Airport (which should be better accommodated by public transport) and through traffic to the motorway network. No serious argument has been made as to how it will benefit local business in East Greenwich.

Further Questions:

- Would it not be better to either widen another river crossing or add an additional crossing that does not rely on the same arterial routes as the current Blackwall Tunnels to try and spread the traffic more evenly across the capital?

**Redevelopment, urban renewal and other socio-economic issues**

It is significant that any positive improvement in the area, be it land or business development, or improved visual impacts, have followed better public transport links. The second Blackwall road tunnel was followed by another 20-30 years of decline. We appreciate that this may not be causal but has any historical study been made of the economy of East Greenwich?

Poor environments deter economic and business improvement. Where is the evidence of the likely trade-off between improved environment and saving 20 minutes of journey time?

Construction will inevitably lead to increased Heavy Duty Vehicles (HDV) during the period of construction, the estimated figure is 61 movements per day in the peak constructions year, as it is below 200 no assessment was required. Whilst this may be below required levels, it will undoubtedly increase traffic, pollution & reduce air quality in an area which already exceeds legal limits and therefore should be taken into consideration. If this traffic is using the already congested routes it will certainly worsen congestion in the short term and add to air quality issues.

Further Questions:

- Methods of transportation of construction materials & waste such as by river have been considered, can these be further utilised to reduce HDV movements?
- In addition there will also be Non-road mobile machinery (NRMM) emissions it is acknowledged that these are inevitable but states that these will not significant, where is the data to back this up?
- Can HDV movements be limited to off rush hour times of day such as mid morning to early afternoon to minimise traffic impact and that to local residents of early morning / late night movements?

**Transportation and traffic**

Studies have shown that building new roads is likely to increase the overall amount of traffic in the area, this is particularly true in places where demand for those roads is very high and the existing road are operating close to capacity, as is already the case on the A2, A102, Tunnel Avenue, Trafalgar Road and their surroundings, all of which border or run through the EGRA area. Our members already experience large delays whether driving or using buses when the existing tunnel is closed or accidents occur, this would only increase with the increased traffic we believe would be attracted to the area as a result of Silvertown tunnel.

- It is admitted that, even when tolled, the Project is likely to increase traffic by 35-50%. This estimate remains opaque. In the first year of operation of the second Blackwall Tunnel the increase in traffic was over 100% (Research Memo 185, GLC, 1969). Admittedly that new tunnel was not tolled. Estimating induced traffic is however subject to wide margins of error. Have sensitivity tests of possible margins of error been sufficiently assessed?
- As highlighted by the No to Silvertown tunnel campaign, a 1996 study into the phenomenon of induced traffic was carried out by an independent group of experts at the request of the Department for Transport. It found that where induced traffic was not included in the original estimates for new roads, then a year after opening, on average they showed 10% more traffic than the estimates suggested. Meanwhile the old roads that should have benefited from less congestion showed a bigger rise: 16% more traffic than estimated used the old road over the same time period. This overall increase in traffic means local residents will bear the burden of increased traffic – increased pollution, increased risk of traffic accidents, increased noise.
- Contrary to the position put forward by TFL we think it very likely that instead of easing congestion, there will be an increased volume of traffic heading through our area and that both drivers and local residents will suffer as a result.
- The congestion is likely to shift south of the tunnels onto the A102. This is a road that already suffers from high congestion levels and would be hugely expensive to widen. Has sufficient modelling of congestion at pinch-points been undertaken?
- Whilst user charging is being proposed to ease congestion as there are no toll free crossing east of Rotherhithe we do not believe that this will not deter travel as there is no toll free choice available and the only one available will mean further traffic trying to get to Rotherhithe which will likely mean they travel on roads between the A2 and there which are already congested and have air quality issues.

**Further Questions:**

- Can modelling be provided showing scenarios where traffic through the tunnels is increased by 10 or 20% on the current estimates? Given the timelines involved here, these would hardly be unheard of changes and we would like to understand the impact of these and on which roads to properly assess the impact. We should be able to assess realistic, better & worse case scenarios.
- How small a change to the forecast traffic models brings significant detrimental outcomes? Have other possible infrastructure projects been taken into account and what the effect would be if for some reason other river crossings were not fully operational?

**User charging**

There are few studies of the effect of urban road user charging on traffic levels. On what evidence are the forecasts of tolled traffic use based?

Removing the only toll free crossing east of Rotherhithe does not seem fair on East Greenwich residents nor on East Londoners as a whole. There are at least 10 river crossings in the west of London all of which are free, this feels that it is unfairly weighting the charges to those in East London

- Tolls are cheaper per individual journey than the Dartford tunnel (Cars £1 vs £2.50, Large Van £1.65 vs £3, HGVs £4.00 vs £6.00), this is effectively enticing people to use these crossings rather than Dartford and particularly for the heavier polluting larger vehicles which are currently not able to travel through the Blackwall tunnel will bring them from a much less densely populated area into a much more densely populated area bringing with them increased pollution and other road risks such as accidents.
- Creating a toll on the existing Blackwall Tunnel crossing will undoubtedly have an impact on local businesses, both in terms of those travelling to their places of work, receiving deliveries & customers travelling across the river as well on local residents going about their day to day activities. Whilst encouraging people to think twice about whether a car journey is required and encouraging people to use public transport, some journeys are necessary and this will add an extra financial burden on East Londoners who need to cross the river for business or pleasure as there will no longer be a free river crossing east of Rotherhithe.
- The incentives for lower emission vehicles are welcomed, but the exemptions for Buses, coaches & minibuses should take into account whether they are low emissions or not rather than a blanket exemption.

Further Questions:

- What was the rationale / methodology used to arrive at the charges and how were the relative benefits to drivers of using the Dartford tunnel vs the Blackwall tunnel vs Silvertown Tunnel assessed to predict their behaviour in the traffic and hence air quality modelling?

### **Concluding Remarks**

EGRA does not accept that a robust case has been made for the expansion of the tunnel lanes near East Greenwich from four to eight. We suggest that the consequent increase in peak traffic will lead to severe congestion elsewhere on the local road network. This is likely to result in further exceedences of particulate and nitrogen dioxide air pollution in an AQMA where pollution is already at illegal and lethal levels. We note that the air quality impact assessments on which the Project application is based remain “preliminary”.

Any redevelopment arguments for the Project do not appear to counterbalance such serious concerns, nor have ways to improve the resilience of the existing tunnels been adequately explored. Finally, the issue of tolls is insufficiently examined. There seems to merely a hope that tolls will reduce induced traffic to more acceptable levels.

If, however, the Project were to be approved, we would expect that far better mitigation measures be introduced for both air quality and noise. Furthermore we would hope that the local area’s severely overstrained public transport be given serious consideration.

Given the late nature of our expression of interest, we understand that you are under no obligation to take these into account, but given our locality to the project we hope that you see the merit in

addressing these concerns & answering our questions for the benefit of local residents. We look forward to hearing your response.

Yours faithfully,

Dan Hayes

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