

The Planning Inspectorate
3D Eagle
Temple Quay House
2 The Square Bristol, BS1 6PN



Registration Identification Number 341

15 November 2016

Dear Sir or Madam,

Silvertown Tunnel

This is the personal submission of Emily and Michael Norton who live in the area bounded by Maze Hill, the A2, A106 and A206. We are affected by the traffic levels on all these roads. We know how much of a barrier the river is, how important river crossings are and how much they affect the area in which we live. We feel strongly that river crossings need to be evenly distributed to avoid concentrating traffic in any one residential area and to reduce the distance vehicles travel to cross the river. We are very concerned about the proposed Silvertown Tunnel.

The Blackwall Tunnel approach roads pass through residential areas where the level of housing is increasing all the time. The priority should be to reduce levels of traffic and discourage through traffic rather than build a new tunnel that will encourage more traffic. Levels of pollution in the area is currently unacceptable. The proposals submitted by TfL for the Silvertown Tunnel don't seem to guarantee that levels of pollution will lessen and we fear worsening pollution in some areas due to increased congestion on roads away from the proposed crossing as vehicles change their journey patterns to use or avoid the new crossing.

Further improvement of public transport infrastructure should be the priority so that public transport becomes a real option for travelling between north east and south east London. Huge improvements have happened in the last 20 years and there has also been a significant increase in traffic congestion but it is still much easier to use a car when travelling anywhere other than central London.

We haven't seen any proof that the Silvertown tunnel would even be needed if other crossings were built first. Considering the Silvertown Tunnel as a standalone project without taking into account other proposed East London river crossings is crazy.

We fear years of disruption and increased pollution during construction followed by an increase in overall traffic and in particular in HGV traffic because of the removal of the northbound height restriction.

Traffic congestion, noise and pollution:

We are particularly concerned that traffic levels will increase and related congestion/pollution increase in areas away from the Blackwall/Silvertown tunnel approach roads. We question whether future increase in demand for river crossings can be avoided even with the introduction of tolls. We do not believe that demand for this river crossing in particular will simply go away if tolls are introduced and that this demand may continue to increase well beyond the first 5 years especially if additional crossings are not built.

Having read the Traffic Impacts Mitigation Strategy we feel that three to five years is not long enough to assess the long term impact of this scheme. We feel that the effects of the crossing should be monitored for at least 10 years, probably 20.

If people need to cross the river and their origin and destination are not linked by a reasonable public transport link then they will cross by car and choosing one crossing and not another may result in traffic patterns that have not been modelled. As can be seen from the current high demand for the Blackwall crossing, despite long queues, there are not attractive alternatives to driving.

Even if demand levels at Blackwall/Silvertown are successfully controlled we fear that a significant amount of traffic will divert to alternative crossings. 3.2.4 of the Charging Statement recognises that drivers may find alternative routes to avoid tolls. TfL modelling does not seem to have taken into account the impact of drivers changing route on roads between crossings (both towards a supposedly free flowing Blackwall/Silvertown crossing and away from it to free crossings). This may result in increased traffic in multiple directions on other roads most of which are in residential areas. Has there been any robust modelling done of the effect of this on junctions when drivers divert in opposing directions?

We know that the A2 southbound is congested almost every night at current traffic levels. We fear additional overspill into local roads if the Silvertown Tunnel is built. We also fear overspill onto local roads that link the A2 and A206. We haven't seen anything in the proposals that guarantees this will not happen.

Unfortunately traffic impact mitigation appears to be planned as reactive rather than proactive. Although the reasons for this are valid in that the effects are unknown we have the following concerns:

- lack of knowledge of the effect that the proposed scheme will have elsewhere brings into question whether this scheme is the right solution for the current problems.
- A reactive system means that there will inevitably be long delays in making changes due to the length of the process.
- It seems likely that it could be difficult to show that any specific traffic problem is definitely attributable to the Silvertown tunnel scheme so mitigation may never happen in some instances.
- There doesn't seem to be any reference to funding for mitigation schemes and therefore one wonders if the funding will be available even if traffic problems are attributable to the Silvertown Tunnel scheme

We welcome STIG but feel that in order to be effective STIG must include local representation so that local knowledge can be included in identification and solution to problems.

We also question the accuracy and reliability of TfL data. For example Figures 4.1 and 4.2 of the Charging Statement show hourly flow rates with a level at which queues are likely to build up. What these graphs don't show is how big these queues are nor how quickly they grow. Northbound there are queues on the A102 most of the time, most days, even at weekends although the length may vary. This is contrary to the statement made at 4.9.6 which says that at weekends traffic volumes remain marginally below the level at which queues build. This raises the question of how accurate the data is in the TfL documents. Clearly a second tunnel is meant to decrease queues but what about the crossover point when users choose between the Silvertown or Blackwall tunnel approach? It is well known that lane changing causes increased congestion.

In general we feel that the predicted benefits of the proposed scheme do not justify either the money to be spent or the risk of simply creating different traffic problems in other, possibly more sensitive, locations where they may or may not be clearly attributable to the Silvertown Scheme and it may or may not be possible to change infrastructure in order to mitigate the effect.

TfL themselves say that only a small proportion of local residents currently use the crossing yet the impact is felt by all. Conversely a significant proportion of current users are local but we wonder if this will change if this scheme goes ahead and so fear that this scheme will mainly benefit traffic from outside the local area at a high cost to local residents.

Charges

Given the level of congestion drivers are prepared to put up with at present we reiterate our question as to whether the proposed charges or indeed any realistic charge will actually succeed in keeping demand for this crossing at an acceptable level.

We also feel strongly that charges unfairly penalise those who live/work in East London and that residents/businesses in South East London will be further penalised by the proposed tidal flow system. Road user charges should be aimed at reducing traffic in the whole area not just at river crossings. The river is already a barrier to movement, charging for crossing the river further reinforces this.

We also support discounts for local traffic. Charging should be discouraging long distance traffic that has more choice of crossings. Local traffic should not be encouraged to travel further to access a free crossing. In general tolls should be part of a far wider scheme that discourages the use of roads in all of inner London not just the central zone.

If there are to be no discounts for local traffic then any proceeds beyond build and maintenance of the crossing should be made available for local transport infrastructure and not for general London wide use. (Development Consent Order para 56)

Construction

Our area already suffers from construction traffic from Greenwich Peninsula trying to avoid traffic congestion. Given that congestion is likely to remain at significant levels at least until the Silvertown Tunnel is built we fear even more construction traffic diverting via our area to avoid traffic queues. We are aware of the Construction Management Plan but are also aware that these usually have clauses that allow alternative routes in the case of congestion on agreed routes. If the Silvertown Tunnel is to be built then the Construction Management Plan needs to prohibit the use of residential streets completely and this needs to be enforced.

All in all we object to the current Silvertown Tunnel scheme and would like it rethought as part of a wider transport plan for London.

Emily and Mike Norton