Sally Hughes, [redacted]

To: The Panel of Examining Inspectors
silvertowntunnel@pins.gsi.gov.uk

15 November 2016

Dear Members of the Panel,

S89 Planning Act 2008, and Infrastructure Planning (Examination Procedure) rules 2010.

Application by Transport for London (TfL) for an order granting development consent for the proposed Silvertown Tunnel

Representations of Sally Hughes to The Panel of Examining Inspectors

I have lived in Greenwich town centre ([redacted] for 34 years. I have never commuted by car to jobs I had during my working career in various locations (including Holborn, Middle Temple, Highgate, Stockwell, and Stratford). I am a car and bicycle user. I have made use of the Blackwall tunnel periodically to visit friends in Walthamstow, north London and Essex. I have accessed IKEA at Thurrock using both the tunnel and the Dartford Crossing, depending on traffic flows.

I responded to online consultation(s) and made outline comments in response to the proposed Silvertown Tunnel. Having read many of the supporting documents to the application, I wish to advance the following arguments in opposition to the proposal.

Summary

There is no reasonable justification for building a new road crossing on the Woolwich Peninsula, effectively in the same location as the existing Blackwall Tunnel.

The application for consent for the Silvertown tunnel is driven by and designed with the aim of improving traffic flow in the Blackwall Tunnel at peak times. The project would fail to realise the creation of new easterly crossing(s) to improve connectivity and promote economic growth and to meet the needs of a geographically expanding population in east London in the Thames Gateway.

The two objectives cannot be achieved with one tunnel. A former proposal for the Thames Gateway Bridge would have met the strategic aims for national infrastructure. However this was quashed ostensibly for political reasons. The resulting compromise is this application.

Contrary to public policy, the project proposes to multiply car use by creating additional capacity in a tunnel that duplicates existing capacity, threatening greater congestion in north west Greenwich than already exists, adding to unacceptable pollution and failing to take account of widespread increases in congestion throughout inner London.

Mitigation of Blackwall Tunnel congestion now by more conservative measures could be achieved without building a second crossing on the Woolwich Peninsula. A new road crossing would be best placed between Woolwich and Dartford.

Public policy
In general, the interaction of political factors with the goals of the project and other policy objectives has not been analysed appropriately. The application is narrowly focussed on:

- creating road traffic capacity and
- peak hours traffic management.

However the supporting case focuses on policy objectives that include the generation of 'access to jobs' and economic growth in Silvertown. The case for alternatives, such as crossings located farther to the east, at least on the south side, is not considered even for the purposes of discounting it or making a comparison.

Despite progress in public policy, no analysis considers externalities or pubici policy goals such as:

- conserving capital and monetary resources,
- promoting public health,
- cutting emissions (except in the context of operating the route from 2023 when additional traffic generated will increase emissions locally),
- reducing or avoiding increases in carbon footprint, or
- encouraging changes in mode of travel and route (except for the extension of two bus routes – which could be extended via the use of single decker buses in the existing tunnel).

Political intervention
The political underpinnings of the current proposal are based on undemocratic and non-empirical treatment of policy in this field. Planning processes are notoriously subject to discretionary action by government ministers, and the fiat of the London Mayor. Thus the London Gateway scheme was suppressed without explanation by Boris Johnson on his assumption of the role of London Mayor in 2009.

The current Mayor, Sadiq Khan, who took office in 2015, has already changed his mind from the policy on which he was elected, to acceptance of the scheme, without explanation or justification to the electorate.

The current "Silvertown Tunnel" project has been developed against a background of Johnson's veto, and Conservative Party political policy tending to favour car ownership and use in central London, while giving a relatively

lower priority to emissions reduction, anti-congestion measures and public health.

A project of this nature should be seen as capable of achieving environmental benefits in the public interest, and in conformity with the government's international climate change undertakings.

It should also have have been measured against the economic advantages of the London Gateway Bridge, crossing from Becton to Thamesmead, which would:

- provide a substantial crossing almost half-way between Woolwich and Dartford, better meeting the prime strategic economic goals defined by both national and local strategy;
- serve a large population and development area lying between the Greenwich/Woolwich crossings and the Dartford Crossing, thereby enabling a more equal distribution of opportunities to cross the river;
- potentially have had the lesser environmental impact;
- induced route and mode change by new users as well as those who contribute to the current congestion;
- be cheaper to construct than the tunnel. Bridges are cheaper, mile for mile than under water tunnels. The real London Gateway cost in 2009 (£500m) was half the current projected cost of the Silvertown Tunnel (almost £1bn); and
- as a bridge, better accommodate break-downs and large vehicles.

Public consultation, also part of the political process has been largely self-selecting and based on outmoded techniques.

In general, high-level political intervention in infrastructure projects has progressively undermined democratic consultation processes, and reduced consideration of alternatives that are likely to fail crude measures of electoral popularity.

Strategic economic goals.
The supporting documentation includes the case in principle for cross-river movement to stimulate economic growth ('connectivity').

However, although the Silvertown Tunnel has been labelled 'Nationally Significant Infrastructure Project', the economic case is not made convincingly or in terms. The 2014 Outline Business Case [for the Silvertown Tunnel] repeats a phrase from a draft 'National Policy Statement for the National Road and Rail Networks', as follows:

> *Transport is an engine for growth. Well-connected and high performing road and rail networks with sufficient capacity are vital to meet the country's long term needs and support a prosperous economy.*

How very true. However, the project only meets these criteria 'by inference' according to the documentation[1] as an addition to connectivity. The document continues:

> *By inference the lack of such connections and capacity is a barrier to economic growth, and the Silvertown Tunnel is regarded as an important additional connectivity in East London.*

However, subsequent exposition of the primary area for the economic opportunities makes it clear that the important Thames Gateway area requires new connectivity. As London grows, demand inevitability will be much ffarther east of north west Greenwich.

> *London Thames Gateway is one of the most deprived areas not only in London but also in the UK; and the lack of adequate road transport connections and capacity is a major barrier to the accommodation of population and economic growth which is forecast for south and south east London.*[2]

The case for building a new, more easterly connection has therefore been transposed onto the case for duplicating the Blackwall Tunnel, while simultaneously dealing with congestion at that crossing.

Traffic surveys in the supporting documentation indicate that the majority of traffic originates in the three London boroughs in which the Blackwall/Silvertown tunnels are located. The case for designating it a nationally significant infrastructure project is not made, or not made sufficiently well to justify the cost and disadvantages, or the westerly location.

The rationale for Silvertown is presented in far more detail as improving Blackwall capacity and therefore resilience to the congestion that has already overtaken not only this tunnel, but also the whole of central London during peak hours.

Improving the Blackwall Tunnel route

The Silvertown Tunnel will not be a 'new' crossing. It is a replacement for and an enlargement of an established crossing, and simply proposes to accommodate more vehicles to keep the crossing flowing.

The analysis in the supporting documentation for this application amounts to an expensive measure to reduce hold-ups on entry to the Blackwall tunnel during peak hours. This traffic-based justification is based on analyses of the origin and frequency of traffic movement, and reasons for 'incidents' (reasons for delay, blockages and hold-ups) in traffic movement at and in the tunnel.

Pie charts presenting 'incidents by type' in the supporting documentation[3] suggest that 'Overheight Vehicles' account for 60 per cent of hold-ups north

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[1] TfL *Silvertown Tunnel Outline Business Case* October 2014 Version 1.0, paragraph 7.

[2] Ibid: paragraph 9.

[3] Ibid: 'The Case for Change' Figures 2-15 and 2-16, p 40.

bound. The explanation is that filtering of overheight vehicles creates hold-ups on the approach immediately south of the tunnel entrance. (Each such vehicle detected results in a red light to all traffic while the vehicle is filtered to the escape road.)

The north-south return only records one per cent overheight vehicle 'incidents'. This suggests either that filtration works better on the northern approach, or that journeys through the tunnel originate south of the river. Surely far less than £1bn would buy a solution to this.

The other major 'incident' creating hold-ups is given as breakdowns. Breakdowns are inevitable. As demand increases, whether induced, or resulting from organic growth in London, a new tunnel and its approach roads must perform well.

While a new location for the approach has been found north of the river at Silvertown, none has been sought in north Greenwich. The projected tunnel will not be capable of high performance because the transport infrastructure south through Greenwich RB will remain the same. Two tunnels will feed into one road (A102), pushing the bottleneck south.

It is claimed that the Silvertown arm of the tunnel will deliver new connectivity north of the river. Unfortunately this implies more traffic originating in the feeder area in Greenwich, thus contributing to even more congestion south of the tunnel.

In summary, the 'new' crossing has a weak or non-existent connection with growth and economic development. The shift from the London Gateway Bridge serving development in the Thames Gateway, to a traffic management scheme for the Blackwall tunnel, is a compromise of muddled logic, political opportunism, and a failure to analyse traffic management using modern techniques (see 'traffic inducement', below).

The initial impetus was for another traffic crossing aimed to cure the absence of strategic road crossings east of Woolwich in the lacuna identified between the existing Greenwich/Woolwich crossings and Dartford. The proposal would not achieve this.

The 'business' or 'practical' case

The business case for the tunnel is inadequate in that it simply describes a financial mechanism to pay for the road via charging. The 'business' case discussion is effectively the 'practical' case.

The supporting documentation refers to charging as 'the key mitigation' in reducing the impact of pollution.[4] Charging is also essential to the business case in that it is the only means – apart from general taxation – of paying for the tunnel. Charging as a means of improving traffic flow now in the existing

[4] *Silvertown Tunnel 6.4 Environmental Statement Non Technical Summary (NTS)*

Blackwall Tunnel is not considered as a means of testing assumptions or offered as an immediate mitigation.

Traffic inducement is ignored in the supporting documentation. Various factors in the current situation congestion at certain times, and/or the opportunity to route via different crossing points at Rotherhithe, Blackwall, Woolwich Ferry and Dartford.

Analysis of Induced Traffic would be an important analytical tool in considering the proposal also. Induced effects of faster, incident-free roads (including the new Silvertown Tunnel) generally include:

- 'rescheduling of trips to take advantage of improved conditions at peak periods;
- increasing frequency of trips;
- decreasing vehicle occupancy;
- switching between public transport and private vehicles (mode shift);
- travelling to new destinations;
- making entirely new vehicle trips; and
- car ownership'

according to research into road systems in Manchester. [5]

The new tunnel could intensify car use as a result of induced usage, defeating efforts to substitute public transport as the mode of travel. Induced traffic effects also include changes in the patterns of land use and therefore land pricing. This would apply in north Greenwich and prove counter-productive to efforts to provide affordable housing.

Knowledge of induced effects in north America as well as the UK has provided a factual basis for understanding the effect whereby new roads generate more traffic than the amount for which they were planned.

Although many of these effects are already intuitively understood, and implied by some of the rhetoric of change, the Manchester study models predictive survey methods that could have an important and influential effect on consideration of the complex scenario in which the current project is located.

The Manchester Motorway Box study suggests various mitigations of peak traffic flow that could be manipulated via induced effects (such as charging), including:

- car occupancy changes;
- (macro) changes in departure time – through rescheduling of activities;
- peak spreading – through smaller (micro) changes in departure time;
- changes in route choice.

[5] James Fox and Andrew Daly, *Manchester Motorway Box: Post-Survey Research of Induced Traffic Effects Model Estimation* Rand Europe TR-676-DfT 22 June 2010 Prepared for the UK Department for Transport.

This means that mitigation of Blackwall Tunnel congestion now could save the huge cost of simply expanding road capacity via a second tunnel. A second tunnel is likely to create induced traffic effects capable of increasing traffic in addition to succeeding in generating traffic for the stated aim of connectivity. It is vital to begin now to reduce congestion and create a knowledge base to determine whether this crossing can continue without duplicating capacity and depriving more easterly locations.

The supporting documentation refers to charging as 'the key mitigation' in reducing the impact of pollution.[6] Charging is also essential to the business case in that it is the only means – apart from general taxation – of paying for the tunnel.

Charging is politically sensitive, and can militate against 'connectivity'. However we are entering an era of declining car use, and there is more widespread acceptance of payment for pollution by polluters.

Apart from the general political point, more specific turf wars are already being carved out by politicians along the south bank. There is a widespread belief in the perceived inducement to travel west to Rotherhithe to avoid charging at Blackwall. By the same token, more westerly local authorities might perceive advantage in supporting an expansion of the Blackwall crossing to shift traffic into north Greenwich.

The Silvertown Tunnel cannot be expected to fulfil contradictory goals, or be subject to charging simply to pay for a white elephant. A far more substantial and convincing case needs to be made for it.

Pollution

On the evidence presented, a second tunnel at Blackwall will not (apparently) add significantly o pollution when in operation in 2023. I cannot follow the reasoning for this. The environmental impact will rather -

- perpetuate unacceptably current high levels of existing pollution.;
- consist also in the carbon emissions, extractive activity and energy squandered in building the tunnel.

The analysis supporting the application incorporates unacceptable assumptions about tolerable levels of environmental harm. Car pollution along the A102 corridor is already beyond current lawful limits, a major factor not acknowledged in the supporting information to the application. A recent European Court ruling found that the UK is breaching requirements to cut pollution over time. This is said to be leading to a vital review of policy in this area. To increase future car use in a populous area that is already heavily polluted, is regressive in light of current and future trends in transport, and contrary to public policy.

[6] *Silvertown Tunnel 6.4 Environmental Statement Non Technical Summary (NTS)*

In conclusion I believe the applicaton for the Silvertown Tunnel seeks to achieve contradictory objectives at an unacceptable cost in terms of financial outlay, pollution and congestion that is likely to be generated.

Yours sincerely,

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