

# No to Silvertown Tunnel [SILV - 227]

## Written Representation to Planning Inspectorate

15 November 2016

### SUMMARY

**No to Silvertown Tunnel** welcomes the opportunity to put our views to the Panel. Our views incorporate the concerns of residents and transport experts. The campaign's committee delegated writing this written representation to three of its members, and has approved it.

### Charging

In this submission, we will argue that there are significant risks that TfL's user charging plan will fail as a means of mitigating demand for the Blackwall and Silvertown Tunnels:

- TfL does not address the risk that political pressure will be applied to keep user charges below the price which will discourage use of the tunnels.
- TfL will be subject to conflicting incentives: to increase user charge revenue to repay construction costs and to manage demand to limit congestion.
- The proposed user charge regime unfairly affects residents in east and particularly south-east London.
- The user charges modelled in the Assessed Case are cheaper than comparative public transport journeys, which gives us little confidence any modal shift to public transport will be encouraged.

### Modelling

While we note that TfL has modelled different scenarios within its base models, it is unclear with what degree of confidence original or extrapolated estimates are made. This leads to an imperfect understanding of the risks involved.

### Monitoring and mitigation

With regard to monitoring and mitigation, the annual cycle, as planned, is slow and unresponsive. The monitoring period is inadequate, and we believe there will be tensions within the Silvertown Tunnel Implementation Group (STIG) to do with collection and analysis of monitoring results and with mitigation solutions.

The planned noise monitoring is insufficient, given that the Scheme will attract full-sized HGVs (which cannot use the existing 1897 Blackwall Tunnel) travelling northbound and traffic will, according to TfL, move faster. This will result in more noise, including in areas well outside TfL's monitoring area of 200 metres beyond the order limits.

As air quality monitoring inputs are derived from TfL's traffic modelling outputs, the results are subject to the same risks. The plan for monitoring air quality is inadequate.

### Local impacts

We are concerned that this scheme will not address congestion in areas that are already vulnerable to queuing traffic, both north and south of the Thames.

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### **Proposed bus services**

We argue that TfL's plans for bus services should be reviewed and a commitment to improve them should be included in the Development Consent Order. We question the efficacy of the dedicated cycle carrier proposed by Mayor Khan.

### **Economic case**

As the economic case takes output from the transport models as a key input, it suffers from the same flaws and risks. If these underlying transport models do not accurately forecast traffic volumes and flows, there can be no hope that the economic assessment will be correct.

### **Appendices**

In Appendix A, we answer the Panel's first written questions, issued on 18 October 2016. In Appendix B, we respond to the Rule 17 letter of 9 November 2016.

Appendix C contains a letter we sent to Sadiq Khan, the Mayor of London, seeking further information on benefits for "local residents who use the tunnel".

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## 1. INTRODUCTION

### 1.1 How the campaign began

1.1.1 The **No to Silvertown Tunnel** campaign came from a petition launched in December 2012<sup>1</sup>, at the time of Transport for London's second consultation into new road river crossings<sup>2</sup>.

1.1.2 The creators of the petition, who both lived in the borough of Greenwich, were alarmed both by the lack of public knowledge of the proposal, and prompted into action by the leadership of Greenwich Council's decision to launch an "all out" campaign<sup>3</sup> to get the Silvertown Tunnel built, which included a plan to offer residents pre-paid postcards<sup>4</sup> to respond favourably to the consultation.

1.1.3 The area around the A102, and along the A206 through Greenwich and Charlton, has long suffered from poor air quality, and it seemed clear that the proposals would simply be counter-productive. The petition got press attention<sup>5</sup> and spurred people - and the media - into asking questions about the scheme.

1.1.4 In the spring of 2013, it was suggested that the petition's creators link up with Network For Clean Air, an organisation campaigning on air pollution, to conduct "citizen science" air quality studies. A group of volunteers placed tubes on lamp posts in the area around the A102 through Greenwich, Charlton, Blackheath, Kidbrooke and Eltham. The results were revealed at a public meeting in Greenwich in October 2013, and the formal campaign group launched in January 2014.

1.1.5 The campaign now has residents from both sides of the Thames on its committee, and has over 650 people on its email list. Some of our committee members serve on other local residents' groups, such as the East Greenwich Residents' Association, the Westcombe Society, Charlton Central Residents' Association and the Charlton Society. We have also benefitted from discussions with Campaign for Better Transport and Friends of the Earth.

### 1.2 How we've engaged with the public

1.2.1 We have engaged with local residents in two ways: through continuing our citizen science studies, and through outreach activities.

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<sup>1</sup> The original petition is still online here:

<https://www.change.org/p/mayor-of-london-greenwich-council-and-newham-council-reject-plans-for-a-silvertown-tunnel-3rd-blackwall-tunnel>

<sup>2</sup> TfL's October 2012 consultation: <https://consultations.tfl.gov.uk/rivercrossings/consultation/>

<sup>3</sup> *Greenwich Time* (weekly council newspaper), 4 December 2012

<http://edition.pagesuite-professional.co.uk//launch.aspx?eid=804012af-ea32-40f3-b325-5417e28195ef>

Also Greenwich Council website - Bridge The Gap campaign. Archived by Wayback Machine, 1 January 2013

<http://web.archive.org/web/20130101032445/http://www.royalgreenwich.gov.uk/bridgethegap>

<sup>4</sup> Briefing paper for Greenwich Labour councillors, November 2012 (released under Freedom of Information Act)

[http://www.silvertowntunnel.co.uk/wp-content/uploads/2016/11/labour\\_group\\_261112\\_001.pdf](http://www.silvertowntunnel.co.uk/wp-content/uploads/2016/11/labour_group_261112_001.pdf)

<sup>5</sup> Thames Tunnel from Greenwich to Silvertown: whose side are you on?, *News Shopper*, 4 January 2013

[http://www.newsshopper.co.uk/news/10142134.Thames\\_tunnel\\_from\\_Greenwich\\_to\\_Silvertown\\_whose\\_side\\_are\\_you\\_on/](http://www.newsshopper.co.uk/news/10142134.Thames_tunnel_from_Greenwich_to_Silvertown_whose_side_are_you_on/)

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1.2.2 We have now conducted three air quality studies, using diffusion tubes to check on NO2 levels mostly in locations not continuously monitored by local authorities.

1.2.3 As mentioned earlier, in 2013 we placed 56 diffusion tubes in areas south of the Thames likely to be affected by an increase in traffic using the A2/A102 corridor between Eltham and Greenwich Peninsula<sup>6</sup>.

1.2.4 A 2014 study, undertaken in conjunction with a Deptford campaign group concerned about the Thames Tideway Tunnel project<sup>7</sup>, placed 100 diffusion tubes across the boroughs of Greenwich, Newham, Lewisham, Southwark and Bexley<sup>8</sup>. We believe it is the largest citizen science air pollution study undertaken in London.

1.2.5 Both these studies were carried out with Network for Clean Air to ensure that DEFRA standards of accuracy were maintained.

1.2.6 We undertook a third study in 2015, this time alongside Mapping for Change, in the Royal Docks, Canning Town and Poplar<sup>9</sup>. This showed levels of NO2 above legal limits in places including Tidal Basin Roundabout, where the proposed tunnel route would join the local road system.

1.2.7 Our own air quality surveys have also encouraged several residents' associations to carry out their own studies, and we have obtained funds to help more groups carry out new studies in 2017.

1.2.8 In addition to the pollution studies, we have held public meetings on both sides of the Thames. During the 2015 statutory consultation, around 100 people came to the Forum at Greenwich to hear Dr Ian Mudway of King's College London and transport journalist Christian Wolmar discuss the Scheme's implications for health and the road network. We have also distributed leaflets locally and have had stalls at public events in the boroughs of Greenwich, Newham and Lewisham.

1.2.9 We've also given talks to local Labour and Green party members, met local councillors and discussed the issues with local MPs - including Matthew Pennycook, Lyn Brown and Stephen Timms - and London Assembly members from Labour, the Liberal Democrats, the Greens and the Conservatives.

1.2.10 Motions against the Scheme have been passed by Lewisham<sup>10</sup> and Hackney<sup>11</sup> councils after we held discussions with local councillors.

### **1.3 Our approach to this process**

1.3.1 We welcome this opportunity to present our arguments to the Panel, which incorporate feedback from local residents and advice from those working in the transport and environment fields. Many local residents, particularly close to the Thames, feel powerless after many years of redevelopment and

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<sup>6</sup> <http://www.silvertowntunnel.co.uk/our-study/our-results/>

<sup>7</sup> Don't Dump on Deptford's Heart:

<https://dontdumpondeptfordsheart.wordpress.com/2014/05/01/deptford-citizens-prove-pollution-levels-are-twice-the-e-u-legal-limit/>

<sup>8</sup> <http://www.silvertowntunnel.co.uk/our-study/2014-silvertown-tunnel-pollution-study-results/>

<sup>9</sup> <http://www.silvertowntunnel.co.uk/our-study/2015-no-to-silvertown-tunnel-pollution-study-results/>

<sup>10</sup> Item 15: <http://councilmeetings.lewisham.gov.uk/ieListDocuments.aspx?CId=138&MIId=3848>

<sup>11</sup> <http://mginternet.hackney.gov.uk/mgAi.aspx?ID=22971>

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construction schemes in their neighbourhoods. Indeed, some who have challenged this scheme have simply been ignored or have faced a hostile reaction from local representatives.

1.3.2 We are fortunate to have built up a constructive relationship with Transport for London's project team, and are grateful for the approach taken so far by the Panel.

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### 2. USER CHARGES

#### 2.1 Pricing used to manage demand

2.1.1 The Applicant argues that the success of the Scheme is entirely reliant on its ability to set user charges in order to limit demand. It claims that as a result of charges, the Scheme “would not lead to an overall increase in highway demand”<sup>12</sup>. TfL argues a “flexible’ user charge” will act as “an effective tool” to limit demand. But the Applicant does not sufficiently address the risks associated with using pricing to manage demand using the procedures outlined in the draft Development Consent Order (DCO).

2.1.2 According to the process for agreeing changes to user pricing set out in the DCO, any change must follow consultation with organisations it considers representative of users of the Blackwall and Silvertown tunnels, along with Greenwich, Newham and Tower Hamlets councils. After this, TfL must submit revised prices to the Mayor of London for approval. Once approved, changes to user charges may only take effect 56 days after publication.

2.1.3 The Silvertown Tunnel Implementation Group (STIG) will consist of representatives of those councils named above, along with other London boroughs. We note that although TfL stresses the importance of price flexibility, STIG is at present only expected to meet annually after their first year of operation, and for five years at most after the Scheme’s implementation. It seems unlikely that this group, as presently planned, will be able to influence any truly flexible pricing strategy.

2.1.4 However, it is foreseeable that user organisations and political representatives will apply pressure to keep charges low so that costs are not passed on to constituents. Political pressure has affected road pricing in London in the past: the western extension of the central London congestion charge was cancelled in 2010<sup>13</sup> after a commitment to review its operation was made in Boris Johnson’s 2008 election manifesto<sup>14</sup>.

2.1.5 Already, we are seeing Newham Council applying pressure for local concessions on user charging<sup>15</sup>, along with the London Assembly member for Havering and Redbridge, Keith Prince<sup>16</sup>. It is unlikely that the Applicant will be able to act as freely as it wishes if it is found that the equilibrium price to manage demand is higher than public and political expectation.

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<sup>12</sup> TR010021-000228-7.1 Case For The Scheme, paragraph 1.1.7.

<sup>13</sup> Mayor confirms removal of Congestion Charge Western Extension Zone, TfL, 20 October 2010  
<https://tfl.gov.uk/info-for/media/press-releases/2010/october/mayor-confirms-removal-of-congestion-charge-western-extension-zone-by-christmas-and-introduction-of-cc-auto-pay-in-new-year>

<sup>14</sup> Boris Johnson’s 2008 transport manifesto, page 14  
<http://image.guardian.co.uk/sys-files/Guardian/documents/2009/04/27/Transportmanifesto.pdf>

<sup>15</sup> ‘Significant concerns’ about Silvertown Tunnel raised by Newham Council, *Newham Recorder*, 4 November 2016  
[http://www.newhamrecorder.co.uk/news/significant\\_concerns\\_about\\_silvertown\\_tunnel\\_raised\\_by\\_newham\\_council\\_1\\_4763685](http://www.newhamrecorder.co.uk/news/significant_concerns_about_silvertown_tunnel_raised_by_newham_council_1_4763685)

<sup>16</sup> ‘What have you got against East Londoners?’, *Waltham Forest Guardian*, 20 October 2016  
[http://www.guardian-series.co.uk/news/14813803.What\\_have\\_you\\_got\\_against\\_east\\_Londoners\\_Redbridge\\_AM\\_quizzes\\_Sadiq\\_Khan/](http://www.guardian-series.co.uk/news/14813803.What_have_you_got_against_east_Londoners_Redbridge_AM_quizzes_Sadiq_Khan/)

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2.1.6 If TfL cannot set prices high enough to manage demand, the only mitigation strategy it has to deal with induced traffic (and associated air and noise pollution) will fail.

2.1.7 The Applicant also argues that “user charging is a means of ensuring that those using the tunnel address the full external costs of their travel”<sup>17</sup>. Yet no other reference within TfL’s documentation refers to using proceeds of the user charge to address external costs. The Applicant should provide more detail on this possible use of funds.

### **2.2 Discounting and exemptions**

2.2.1 The Charging Statement allows discounts for scheme account holders<sup>18</sup>. It is unclear whether the sensitivity testing outlined in the Traffic Forecasting Report accounts for this discounting. Will this discounting dilute the effect of demand management through user pricing?

### **2.3 Fairness of user charging**

2.3.1 It is clear that the scheme cannot avoid the risks associated with induced traffic<sup>19</sup> without applying user charges. The Charging Statement gives seven key principles for the application of user charges<sup>20</sup>, the first of which is that charging should be fair.

2.3.2 There are two obvious unfair outcomes of charging the Blackwall and Silvertown crossings in isolation, as the Scheme proposes:

- a) Businesses and residents of east and south-east London will pay to cross the River Thames, unlike residents who live further to the west. This places an unfair burden on residents and businesses based in the area and may make investment in the area less likely.
- b) Businesses and residents of south-east London are particularly affected by the proposed peak charging arrangements. Peak flows are specified as traffic driving northbound in the morning peak hours and southbound in the evening peak. This has the effect that those commuting northwards from a home south of the river are likely to pay twice the amount of those commuting southwards from a home in the north.

2.3.3 The Case for the Scheme<sup>21</sup> deals in particular with the issue of the “barrier effect of the Thames” for businesses and workers who live south of the river wishing to gain access to regeneration areas in the north. It seems unlikely that a solution based on effectively charging those in the south twice the amount of those in the north will meet the objective of removing this barrier effect.

### **2.4 Conflicting incentives**

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<sup>17</sup> TR010021-000232-7.5 Charging Statement, paragraph 4.6.3

<sup>18</sup> TR010021-000232-7.5 Charging Statement, paragraph 4.8.3

<sup>19</sup> TR010021-000232-7.5 Charging Statement, paragraph 3.2.1 and TR010021-000228-7.1 Case For The Scheme, paragraph 1.1.7.

<sup>20</sup> TR010021-000232-7.5 Charging Statement, paragraph 1.3.6

<sup>21</sup> TR010021-000228-7.1 Case For The Scheme, paragraphs 2.9.10-17

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2.4.1 Under the Scheme, the Applicant is to be given responsibility for operating and setting the user charges. It suggests that the secondary reason that user charges are required is to pay for construction and maintenance. This responsibility for construction and maintenance is subcontracted to a project company, whose payment is affected by performance on availability and quality of maintenance measures.

2.4.2 This means that TfL may be incentivised to vary the user charges to meet the payment requirements, with the resulting risk that demand is not managed according to impact on the road network or surrounding environment but according to TfL's obligations to pay the project company.

### **2.5 Assessed Case pricing incentivises private transport usage**

2.5.1 In any comparison of 2015 public transport charges with the user charges for private cars specified in the Assessed Case<sup>22</sup> use of the road crossings is cheaper. This is likely to incentivise use of the road crossings rather than public transport, and works against Project Objective 7, "to achieve value for money and, through road user charging, to manage congestion".<sup>23</sup>

2.5.2 This applies when both Oyster/contactless discounts and membership discounts for the user charge are taken into account. It also applies before any other reasons for driving (space to bring shopping, additional passengers, etc) are taken into account.

2.5.3 At off-peak charging, cars need to only have one occupant for driving through the tunnel to be more cost-effective. At peak times, driving becomes cheaper as soon as there is more than one person in the car.

2.5.4 Any of the shortest possible Tube or Docklands Light Railway crossings starting on the south side of the Thames between Greenwich and Woolwich (Cutty Sark to Island Gardens, North Greenwich to Canary Wharf/Canning Town, Woolwich Arsenal to King George V) cost more at 2015 prices (£1.50) than driving a car through Silvertown or Blackwall Tunnels at off-peak (£1.00), even if the car has only one occupant.

2.5.5 At peak times, it is cheaper for a driver and one passenger to use Blackwall/Silvertown (£3.00) than to use these DLR or Tube links (£1.70 for each passenger, so a total fare of £3.40 for two people).

2.5.6 This comparison of costs above also holds for the reference journey – Lewisham to Stratford – given in documents from this application as well as earlier consultations.

2.5.7 TfL suggests provision for pedestrians and cyclists to cross the river at the Greenwich Peninsula has already been provided by the Emirates Air Line cable car. At 2015 prices, the cheapest discounted fare for a single journey on the cable car is £3.40 and so use of a car is incentivised over use of the cable car at any time of day.

2.5.8 Travelling by bus (£1.50 per journey at 2015 prices) is more expensive than driving through Blackwall/Silvertown at off-peak and as expensive for two people sharing a car at peak hours.

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<sup>22</sup> TR010021-000232-7.5 Charging Statement, Appendix A

<sup>23</sup> TR010021-000228-7.1 Case For The Scheme, paragraph 6.8

### **3. MODELLING**

#### **3.1 Overall reliability of base models and probability of forecast outcomes**

3.1.1 All forecasts given within the Applicant's submission documents flow from the use of models, in accordance with DfT guidance. Whether modelling is used to estimate the traffic volumes and flows likely once the Scheme is completed or the economic impact of the Scheme, any further figures is based on these original estimates. For example, the forecasts of air quality impact take as their base the forecasts for traffic movement and volume.

3.1.2 While we note that TfL has modelled different scenarios within those base models, it is unclear with what degree of confidence original or extrapolated estimates are made.

3.1.3 The Traffic Forecasting Report<sup>24</sup> describes current forecasts as "the best estimate of most likely impacts of the Scheme which forms a single point within a range of possible outcomes". It is inevitable that estimating future outcomes in a complex environment will lead to uncertainty. But given the high risks and costs that would be associated with the Scheme if the estimated traffic volumes are wrong, we would expect the Applicant to be able to give an indication of how likely the outcome that they have presented is.

3.1.4 No evidence is provided for the reliability of the entire forecasting system as measured against actual traffic flows. TfL has presented evidence on the number and range of sensitivity tests, and carried out Monte Carlo simulations. But it has not addressed the risk that the underlying model may not adequately simulate real-life traffic flows and volumes. If the model is incorrectly specified, then results from it will be in error, no matter how many times they can be reproduced.

#### **3.2 Price elasticity modelling**

3.2.1 Evidence is given for modelling traffic forecasts at three different levels of pricing: higher than assessed case, assessed case, lower than assessed case. But as the viability of the project depends on being able to manage demand by means of a flexible user charge, more information is needed on the price elasticity of demand to cross the river by road vehicle before the likely success of the Applicant's demand management strategy can be fairly assessed.

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<sup>24</sup> TR010021-000240-7.9 Traffic Forecasting Report, paragraph 1.1.2.

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### **4. MONITORING AND MITIGATION**

#### **4.1 Flaws in the Silvertown Tunnel Implementation Group**

4.1.1 We doubt that the Applicant's monitoring and mitigation strategy, as presented, can achieve TfL's stated aim of free-flowing traffic which remains at current volumes.

4.1.2 For traffic congestion, noise, and air quality, there are two possible means of mitigating impacts. One is by TfL adjusting the charging amounts and structure; for instance, raising charges or changing the times of day to deal with new traffic patterns as they arise. The other is local mitigation, for instance road layout changes, carried out by local highway authorities.

4.1.3 TfL intends to consult on mitigation measures through STIG, following monitoring of changes to traffic, noise and air quality.

4.1.4 We have considerable reservations about this process.

4.1.5 Firstly, and as we have mentioned above, the process is likely to be slow and unresponsive, given that after the first year of operation STIG is intended to meet only annually. After that, TfL will be obliged to produce monitoring reports only once each year. There is nothing nimble about this process.

4.1.6 Secondly, STIG appears to have a role only for the first three years of operation, extendable for a further two years. But if the scheme proves more popular with road users than TfL expects, the impacts will be felt for considerably longer.

4.1.7 TfL argues that after five years it will be impossible to attribute changes to traffic patterns to the scheme. But the A102, whose principal function is to bring vehicles to and from the river crossing, is likely to be carrying more traffic both south- and northbound. If the A102 continues to be congested or to be subject to changing road use patterns after five years of monitoring and mitigation, local authorities affected by the Scheme will have a much harder time making a case for mitigation. Yet the problem will still stem from the Scheme.

4.1.8 Thirdly, we note that other mitigation will be agreed through STIG, including all changes to local road patterns. However, for all this work, the responsibility for delivery will lie with local highway authorities. We cannot see any mention of how this work will be funded. Without TfL's agreement that it would fund all agreed works, we cannot see how any of them will be carried out.

4.1.9 Fourthly, we can see considerable tension emerging within STIG, between TfL and local authorities, as a result of political pressure and conflicting priorities regarding charging. This could seriously impair STIG's ability to develop mitigation approaches which are effective and supportive of residents and businesses who are affected by the Scheme.

4.1.10 The decision process represented by the diagram given at Figure 3.2 of the Monitoring Strategy is flawed. STIG should consider first whether any adverse impacts detected in the local area could be

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mitigated by mechanisms within the scheme, rather than only considering mitigating action if the problem is believed to have originated with the Scheme.

4.1.11 With regard to monitoring, some of our key concerns are the same as those for mitigation. The annual cycle as planned is slow and unresponsive; the monitoring period is inadequate; and we believe that there will be tensions within STIG to do with collecting and analysis of monitoring results. The Red-Amber-Green grading system for classifying impacts is unclear, with little to indicate the performance indicators. In addition, we have some specific concerns.

### **4.2 Noise monitoring**

4.2.1 The Monitoring Strategy document sets out the area which TfL proposes to monitor<sup>25</sup>, encompassing an area around 200m from the order limits. We regard this as hugely inadequate.

4.2.2 The A102 and A1261 Aspen Way can expect a large increase in the number of full-sized HGVs, while the A12 southbound and A102 northbound at peak periods will - if TfL is correct in its traffic modelling - see vehicles moving much faster than at present. Faster and heavier vehicles mean more noise.

4.2.3 Residents, schools, businesses and all sensitive receptors from Blackwall Lane Flyover to at least the A2/A2213 Kidbrooke Interchange will all experience more noise, as well as those along the expected routes for traffic from the northern portal.

4.2.4 Specific points for monitoring along the A102 should include Tunnel Avenue by the Blackwall Lane Viaduct; Combedale Road and Tunnel Avenue near Woolwich Road Flyover; Westcombe Hill near the junction with Humber Road; and Siebert Road by the Bramshot Avenue underpass.

4.2.5 Further mapping of sensitive receptors should be done, and should at least include Montessori Education for Autism, 135 Westcombe Hill SE3 7DP; Invicta Primary School, Invicta Road, SE3 7HE; the 30A Charlton Road Care Home SE3 8TY; Blackheath Standard Surgery, 11-13 Charlton Road, SE3 7HB; St Mary Magdalene School, Old Dover Road, SE3 8SY; Blackheath Day Nursery, Rectory Field, SE3 8SR; Halstow Primary School, Halstow Road, SE10 OLD; and the Holiday Inn, Bugsby Way, SE10 OGD. Mitigation is likely to be needed, and cannot be carried out without proper monitoring.

### **4.3 Air quality monitoring**

4.3.1 Reductions in air quality are perhaps the most dangerous of the potential impacts of this scheme. We note that TfL has consulted with local authorities and statutory bodies to refine its approach to this element of the environmental assessment.<sup>26</sup>

4.3.2 However, TfL's strategy for assessing air quality impacts is based on its own traffic modelling, and it gives its own assumptions precedence over other traffic data, such as that used in the London

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<sup>25</sup> TR010021-000233-7.6 Monitoring Strategy, chapter 5.3, figure A-3 and Table A-3

<sup>26</sup> TR010021-000165-6.1 Environmental Statement, chapter 6.3

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Atmospheric Emissions Inventory. Therefore, our concerns over the levels of risk in the traffic modelling carry over into our response to TfL's air quality monitoring.

4.3.3 TfL's assessment of the affected road network to be monitored for changes in air quality has resulted in a much less extensive area than that to be monitored for traffic impacts. TfL's plans for its own air quality monitors do not extend south of the Sun-in-Sands junction on the A102, or west of the Blackwall Tunnel.<sup>27</sup>

4.3.4 While the Applicant will also draw on local authority air quality monitoring, both automatic and non-automatic, it will restrict this to locations within 200 metres of the affected road areas.<sup>28</sup> This is too narrow an area. If TfL plans to monitor traffic impacts as far from the order limits as the A2 Danson Interchange, A100 Tower Bridge, or the junction of the A105 Green Lanes with the A406 North Circular Road, then it must surely accept that traffic effects would demand a wider range of monitoring air quality impacts.

4.3.5 In addition, the Applicant has failed to provide an assessment of sensitive receptors in relation to air quality. The modelled receptors, used for the baseline 2012 figures, do not point out sensitive receptors specifically.

4.3.6 TfL notes that the proposed Silvertown Tunnel would carry 10-11,000 vehicles per day (if successful), including full-sized HGVs. The northern portal will be most disadvantaged by the increase in air pollution. The Applicant's map of sensitive receptors for noise impacts shows three schools and several other vulnerable non-residential receptors within 200 metres of the northern portal.<sup>29</sup> Equally, there will be two new schools near the southern portal<sup>30</sup>. Both portals will have large residential developments immediately beside them.

4.3.7 Given these points, we are not willing to accept that the Applicant's air quality monitoring strategy is adequate for assessing impacts or providing necessary data for consideration of potential mitigation.

### 4.4 Traffic monitoring

4.4.1 TfL has set out a wide-ranging traffic monitoring plan, although it may not fully capture the Scheme's effects<sup>31</sup>. For instance, the Kidbrooke Interchange is scheduled for monitoring only during weekday peak hours. We feel it should be monitored - along with other key junctions - at weekends, to compare against peak tidal flow periods, as changes to the charging periods and local mitigation may be needed.

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<sup>27</sup> TR010021-000233-7.6 Monitoring Strategy, chapter 6.1.4, figure A-2 and Table A-2

<sup>28</sup> TR010021-000166-6.2 Environmental Statement Figures/Drawings 4.1, 6.1-6.2

<sup>29</sup> TR010021-000172-6.2 Environmental Statement Figures/Drawings 14.1-14.5

<sup>30</sup> St Mary Magdalene will fully open from 2018 <http://www.koinoniafederation.com/>, Greenwich Peninsula Academy also due to open in 2018

<http://www.leighacademiustrust.org.uk/our-academies/forthcoming-academies/greenwich-peninsula-academy/>

<sup>31</sup> TR010021-000233-7.6 Monitoring Strategy, chapter 3.6 and Appendix A

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4.4.2 The plan should also include routes including A206 Woolwich Road/Woolwich Church Street and Trafalgar Road; A205 South Circular Road between Catford and A20 Sidcup Road; A2213 Kidbrooke Park Road (and its junction with the A2 at Kidbrooke Interchange); and A2016 Western Way.

4.4.3 These are routes which feed into the northbound A102/A2 and are vulnerable to pressure if, as we expect, demand for the Silvertown/Blackwall crossing increases.

### **4.5 Impacts on other crossings**

4.5.1 In addition, we have concerns about the Applicant's analysis of impacts on the wider network from changed route choices, in particular the diversion to other crossings.<sup>32</sup>

4.5.2 Based on our consideration of the difficulties in using pricing to manage demand, and on the widespread resistance to charging as unfair to local residents, we have concerns that some drivers will divert towards the Woolwich Ferry and Rotherhithe crossings (if avoiding charges) and others to the Blackwall/Silvertown crossing in search of a clearer, faster journey.

4.5.3 TfL has argued that neither adjacent free crossing is an attractive alternative, and that effects on them from the Scheme will be minimal. It also suggests that the one diversion would offset the other.<sup>33</sup> Complicated traffic impacts like this, though, could create far worse junction and route delays than expected.

4.5.4 We are concerned that this type of traffic impact could seriously affect Greenwich Town Centre, a Unesco World Heritage Site, and the buffer zones. Monitoring would require qualitative surveys, and mitigation again depends on charging - which TfL suggests could be lowered in response to pressure on adjacent crossings.

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<sup>32</sup> TR010021-000222-6.5 Transport Assessment Appendices, Appendix E

<sup>33</sup> TR010021-000222-6.5 Transport Assessment Appendices, paragraph E.2.10

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### 5. LOCAL IMPACTS

#### 5.1 Congestion

5.1.1 Nobody would deny that congestion at Blackwall Tunnel is a problem. But a new crossing at this location would exacerbate congestion on a road network that is already struggling. Particularly as the proposed Silvertown Tunnel shares a southern approach with the Blackwall Tunnel.

5.1.2 In the morning rush hour, the tunnel would feed straight into the existing queues on the A1261 Aspen Way through Poplar. In the evening, traffic from the tunnel would add to congestion heading southbound on the A102 through the Sun-in-the-Sands roundabout.



*Photo 5-1: Westbound queues on A1261 Aspen Way during the morning rush hour. Traffic from the proposed tunnel would run straight into this regular traffic jam.*

5.1.3 Other locations, such as the A1020 Leamouth Road and North Woolwich Road will also be affected - indeed, the junction designs<sup>34</sup> show the new tunnel would provide easy access to these roads.

5.1.4 On one hand, TfL says the scheme is aimed at “addressing a local bottleneck”<sup>35</sup>, yet the Classification of Roads Plan says the new tunnel will be designated A102 along with Leamouth Road and the Lower Lea Crossing<sup>36</sup>, creating a continuous major route - which will permit the heaviest HGVs that currently cannot travel northbound - from the A2 at Sun-in-the-Sands roundabout to the A13 East India Dock Road. This seems to be about more than addressing a local problem - it is creating a major new primary road.

5.1.5 In general, TfL is presenting a best case scenario in this application. It appears very little work has gone into considering what will happen if the traffic predictions prove to be overly optimistic. This tunnel cannot be unbuilt, and people who live near its approaches will have to live with its consequences.

<sup>34</sup> TR010021-000248-2.6 Rights of Way and Access Plans

<sup>35</sup> TR010021-000254-5.1 Consultation Report, page 13-27

<sup>36</sup> TR010021-000249-2.7 Classification of Roads Plan

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### 5.2 Specific issues with HGVs and management of the Blackwall Tunnel

5.2.1 TfL claims there will be “a small decrease” in HGV use<sup>37</sup>. In general, we have trouble believing this assertion - this tunnel is, in part, being constructed to allow better HGV access. In particular, this surely will not be the case for the North Woolwich Road, the main route linking the new tunnel with the North Circular Road.

5.2.2 We simply don't believe the Silvertown Tunnel will bring an end to overheight vehicles at the Blackwall Tunnel - many HGVs will want to follow the most direct route across the Thames, and the high numbers of overheight vehicles there show that there are many who do not take notice of signs. Indeed, beyond the creation of a “working party”, nothing is being done to stop northbound HGVs earlier (perhaps at Sun-in-the-Sands or before Woolwich Road flyover) and encourage them to turn back.

5.2.3 We also do not believe the tunnel provides an adequate diversion route for traffic heading to the A12 if the northbound Blackwall Tunnel suffers a lengthy closure (as happened on 24 May 2016 when a crane spilled hydraulic fluid on the carriageway), with a number of traffic lights slowing drivers down.

5.2.4 We would also question what hazardous loads are to be allowed through the Silvertown Tunnel, and how they will be handled. At the Dartford Crossing some need to be escorted, causing delays.

5.2.5 TfL notes that 2,100 incidents took place around the southbound Blackwall Tunnel between 2013-2015<sup>38</sup>. We would ask how many incidents it expects to take place in the Silvertown Tunnel.

### 5.3 Resilience of the A102

5.3.1 We also note that TfL's “incidents” affecting the Blackwall Tunnel include episodes of congestion and accidents that occur outside the tunnel<sup>39</sup> - these would affect any new tunnel as well. TfL calls the Blackwall Tunnel a “lynchpin” of the transport network<sup>40</sup> - but with several routes converging on the A102<sup>41</sup>, the same applies to its southern approach, which will face new pressures from a new tunnel.

5.3.2 Furthermore, adding a new tunnel at this location will make the area surrounding the A102 even more vulnerable if that road is closed, as happened on 1 May 2014<sup>42</sup> when a fire broke out in a nearby yard. More traffic on the A102 will also mean even worse queues if there is a problem at the Dartford Crossing.

5.3.3 The two A102 flyovers, at Woolwich Road and Blackwall Lane, will experience exceptional strain on their infrastructure. Engineering assessments already indicate they are in a poor condition<sup>43</sup>. It appears TfL is taking best case scenarios, crossing its fingers, and hoping for the best.

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<sup>37</sup> TR010021-000254-5.1 Consultation Report, page 13-7

<sup>38</sup> TR010021-000221-6.5 Transport Assessment, paragraph 4.3.9

<sup>39</sup> TR010021-000221-6.5 Transport Assessment, paragraph 4.3.5

<sup>40</sup> TR010021-000221-6.5 Transport Assessment, paragraph S.4.2

<sup>41</sup> TR010021-000221-6.5 Transport Assessment, figure 3-2/ paragraph 3.2.3

<sup>42</sup> <http://www.silvertowntunnel.co.uk/2014/05/01/a102-fire-shows-silvertown-tunnels-insane-idea/>

<sup>43</sup> Documents provided in response to TfL FOI request FOI-2131-1415:

[https://www.whatdotheyknow.com/request/inspection\\_reports\\_a102](https://www.whatdotheyknow.com/request/inspection_reports_a102)

Earlier findings for Blackwall Lane Viaduct covered by BBC London's *Inside Out* in December 2012:

<http://www.bbc.co.uk/news/uk-england-london-20533457>

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### 5.4 Southbound queues along the A12 and A102

5.4.1 We also cannot understand how TfL believes the Silvertown Tunnel, the north entrance of which is in a completely different location, will eliminate southbound queuing on the A12 through Bow and Poplar heading to the Blackwall Tunnel.

5.4.2 We accept some traffic from the M11 may run via the North Circular Road, then through Beckton and the North Woolwich Road to reach the Silvertown Tunnel. But as TfL's transport assessment says, the Blackwall Tunnel will still accommodate the majority of traffic<sup>44</sup>, and will still be the main direct route to south London and Kent.



*Photo 5-2: The Blackwall Tunnel would still accommodate the majority of traffic, so it is hard to see how the Silvertown Tunnel would remove these regular southbound queues on the A12.*

5.4.3 Furthermore, TfL concedes there is regular evening southbound queuing on the A102 back from Sun-in-the-Sands<sup>45</sup>, where it meets the two-lane A2 (and a set of traffic lights at Kidbrooke). Additional traffic from a new tunnel will only exacerbate this problem - something TfL acknowledges in Appendix C of the transport assessment<sup>46</sup>.

5.4.4 TfL suggests some remedies for the A2, such as creating more capacity by using the hard shoulder. But there is no user charge on the A2, and more capacity is likely to induce more traffic on this road - tailing back onto the A102 (as now) and towards the Silvertown Tunnel. It also mentions the A2 "connected corridor" scheme, but this is merely a trial<sup>47</sup> - there is no guarantee this will be in place by the time the Silvertown Tunnel opens.

<sup>44</sup> TR010021-000221-6.5 Transport Assessment, paragraph 7.12.15

<sup>45</sup> TR010021-000221-6.5 Transport Assessment, paragraph 4.2.38

<sup>46</sup> TR010021-000222-6.5 Transport Assessment Appendices, Appendix C, table C-2

<sup>47</sup> Parliamentary answer from Transport Minister Andrew Jones MP, 22 March 2016

<http://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2016-03-17/31581/>

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### 5.5 Commuter use of the tunnel

5.5.1 We find some of TfL's Blackwall Tunnel usage statistics to be unsatisfactory; boroughs are large and diverse areas and it is hard to learn anything meaningful about who uses the tunnel through borough breakdowns.

5.5.2 That said, we note that the largest single group of commuters through the Blackwall Tunnel comes from Kent<sup>48</sup> - a small toll charge of £3 each way will remain attractive compared with, for example, the £37.60 peak return fare from Ebbsfleet International to Canary Wharf<sup>49</sup>.

5.5.3 There is also evidence of user demand from Thamesmead<sup>50</sup>, as well as a belief that the Silvertown Tunnel will boost that particular area's economy<sup>51</sup>. It seems strange that TfL would try to achieve this by prioritising a tunnel at the Greenwich Peninsula if the demand is further downriver.

### 5.6 Residents' discounts

5.6.1 We note that the borough councils who lobbied hardest for the Silvertown Tunnel's construction<sup>52</sup> are now asking for discounts or exemption for residents and businesses within their jurisdictions.

5.6.2 If TfL and the boroughs are serious about encouraging modal shift away from cars, then residents' discounts should be resisted. Those who live closest to the tunnel will - according to TfL's statements - have access to better public transport access across the Thames.

5.6.3 Furthermore, these discounts risk being applied on an arbitrary, per-borough basis, which would increase congestion even further in the host boroughs as residents would be incentivised to drive rather than use public transport.

5.6.4 In addition, residents' discounts increase the risk that TfL's traffic modelling would not match real-world outputs, with consequent impacts on congestion and air quality.

### 5.7 Issues during construction

5.7.1 We note the various objections of Knight Dragon<sup>53</sup> and the companies behind the O2 (including AnSCO Arena Limited<sup>54</sup> and Waterfront Limited Partnership<sup>55</sup>). It seems to us to be impossible to construct

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<sup>48</sup> TR010021-000221-6.5 Transport Assessment, paragraph 3.6.10

<sup>49</sup> 2016 prices. Via brfares.com: <http://www.brfares.com/#faredetail?orig=EBD&dest=ZQC&grpd=0829&rte=131&tk=SDR>

<sup>50</sup> Map contained in TfL "Business Breakfast" presentations on Silvertown Tunnel, September 2015 - page 9:

<http://www.silvertowntunnel.co.uk/wp-content/uploads/2016/11/Business-Breakfast-slide-deck-Sept-15.pdf>

<sup>51</sup> Greenwich Council press release: Royal Borough welcomes new river crossings announcement, 4 October 2016:

[http://www.royalgreenwich.gov.uk/press/article/852/royal\\_borough\\_welcomes\\_new\\_river\\_crossings\\_announcement\\_by\\_mayor\\_of\\_london](http://www.royalgreenwich.gov.uk/press/article/852/royal_borough_welcomes_new_river_crossings_announcement_by_mayor_of_london)

<sup>52</sup> Newham Council press release: New river crossings vitally needed, 4 January 2013:

<https://www.newham.gov.uk/Pages/News/Bridge-the-gap-Fixed-new-river-crossings-vitally-needed.aspx>

Also Greenwich Council website - Bridge The Gap campaign. Archived by Wayback Machine, 1 January 2013

<http://web.archive.org/web/20130101032445/http://www.royalgreenwich.gov.uk/bridgethegap>

<sup>53</sup> <https://infrastructure.planninginspectorate.gov.uk/projects/london/silvertown-tunnel/?ipcsection=relreps&relrep=25262>

<sup>54</sup> <https://infrastructure.planninginspectorate.gov.uk/projects/london/silvertown-tunnel/?ipcsection=relreps&relrep=25263>

<sup>55</sup> <https://infrastructure.planninginspectorate.gov.uk/projects/london/silvertown-tunnel/?ipcsection=relreps&relrep=25264>

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the tunnel without causing huge disruption to both the operations of the O2 as well as the operation of buses into and out of North Greenwich bus station, which already suffer badly when the O2 is busy; particularly during major events such as the National Television Awards (we would suggest a site visit on the evening of 25 January 2017, when the next awards take place).

5.7.2 The operation of route 108 and the various commuter coach services will be severely impaired if they are forced to use the northbound slip road from Blackwall Lane rather than Tunnel Avenue during construction works<sup>56</sup>.

### 5.8 New developments in the area

5.8.1 The impact of the tunnel alongside new developments in the area has not been sufficiently considered. Of particular concern is the impact of a new Ikea store planned for Greenwich Peninsula, which is likely to draw custom from across a wide area. TfL incorrectly asserts<sup>57</sup> that the Ikea store merely replaces a Sainsbury's outlet. In fact, it is in addition to a relocated Sainsbury's store<sup>58</sup> (half a mile away at Gallions Road), with a further shopping development - Brocklebank Retail Park<sup>59</sup> - due to open in between the two sites in 2017.

### 5.9 Public transport does not cater for cross-river journeys

5.9.1 TfL claims there has been no investment in road capacity in this area since the 1960s<sup>60</sup>. This is not the case. Capacity has added to the road network since the 1980s, most notably as part of schemes to regenerate the Isle of Dogs and Royal Docks<sup>61</sup>.

5.9.2 But while public transport has been improved, the cross-river links it provides remain poor. The 1999 Jubilee Line extension follows the river and heads no further south than North Greenwich station; the 2009 Docklands Light Railway link to Woolwich Arsenal terminates just a few hundred metres south of the river. The Abbey Wood branch of Crossrail follows the line of the river, and will primarily be a means of reaching central London rather than a way of making north/south journeys.

5.9.3 The most recent addition, the Emirates Air Line, is primarily a tourist service, charging premium fares that are incompatible with the London zonal fares system. And by its nature as a cable car, it has a very limited catchment area of those who can use it without needing to buy additional tickets for other forms of transport. TfL cites its lowest fare of £1.70 - this is only available for a tiny number of carnet users (and just 25 of these were sold in a sample week in October 2015<sup>62</sup>), and still more expensive than the off-peak charge for a car to use the Silvertown Tunnel.

5.9.4 The public transport system remains inconvenient for the orbital journeys that many Blackwall Tunnel users are making. A trip from Eltham station to Clapton Pond takes 30 minutes by car but 65 minutes by public transport (which may include travelling into central London and back). A journey from

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<sup>56</sup> TR010021-000221-6.5 Transport Assessment, Figure 6-4

<sup>57</sup> TR010021-000254-5.1 Consultation Report, page 13-154

<sup>58</sup> <http://www.j-sainsbury.co.uk/about-us/property/supermarkets/south-east/charlton/>

<sup>59</sup> <http://www.brocklebankretailpark.com/>

<sup>60</sup> TR010021-000254-5.1 Consultation Report, page 17-22

<sup>61</sup> <http://www.lddc-history.org.uk/transport/tranmon2.html#Completing>

<sup>62</sup> Information released by TfL under Freedom of Information Act, ref FOI 1346-1516.

[https://www.whatdotheyknow.com/request/thames\\_cable\\_car\\_users](https://www.whatdotheyknow.com/request/thames_cable_car_users)

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Thamesmead Town Football Club to Leyton Orient Football Club is 35 minutes by car, but 71 minutes by public transport<sup>63</sup>.

5.9.5 The Silvertown Tunnel will do little to solve these disparities. Proposals to address this, such as extending the Docklands Light Railway to Eltham<sup>64</sup>, have been rejected out of hand.

5.9.6 The Applicant has submitted evidence that the Mayor of London, Sadiq Khan, has recently undertaken to assess the possibility of extending the London Overground and Docklands Light Railway to Thamesmead<sup>65</sup>. Given that these suggested improvements have been suggested after the Applicant's demand model was assessed, it is not clear whether TfL has reassessed what the demand would be for private river crossings should these suggested schemes come to pass.

### 5.10 TfL's attitude to cross-river bus services

5.10.1 The attitude of TfL and its predecessors to running bus services across the Thames in this part of London give us little confidence that the services proposed as part of the Scheme will come to pass as promised without a clear commitment in the Development Consent Order.

5.10.2 The 108 service has been the sole route through the Blackwall Tunnel since 1968<sup>66</sup>, while the only route through the Rotherhithe Tunnel was withdrawn in 2006<sup>67</sup>. The 108 has been much less useful as a cross-river link since November 1998, when a circuitous and lengthy diversion via North Greenwich station was added<sup>68</sup>.

5.10.3 We accept running a bus service through the Blackwall Tunnel is challenging. But a fuller study of bus reliability statistics shows that the 108's reliability is not remarkably poorer when compared with other services. The final 1.9 miles of the 108 are in Lewisham, where nine out of 35 other services had the same or a longer excess waiting time in the second quarter of 2016/17<sup>69</sup>.

### 5.11 Route 108 on each side of the river

5.11.1 Even where TfL could have improved services on the corridor served by the 108 bus, it has chosen not to do so. A passenger petition for a more frequent service south of the river<sup>70</sup> resulted in only a single extra departure slotted into to the morning rush hour in 2014<sup>71</sup>. The only enhancements are on weekday late evenings, when additional double-decker buses run in one direction from North Greenwich to Lewisham only to assist with clearing crowds from the O2.

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<sup>63</sup> Figures from AA route planner and Citymapper journey planner.

<sup>64</sup> Hyder Consulting carried out two studies for Greenwich Council. The first in September 2011- <http://www.silvertowntunnel.co.uk/wp-content/uploads/2016/11/elthamdlr001.pdf> - and the second in May 2012: [http://www.silvertowntunnel.co.uk/wp-content/uploads/2016/11/eltham\\_dlr002.pdf](http://www.silvertowntunnel.co.uk/wp-content/uploads/2016/11/eltham_dlr002.pdf)

<sup>65</sup> Mayor commits to building greener, public-transport focused crossings, Greater London Authority, 4 October 2016 <https://www.london.gov.uk/press-releases/mayoral/mayor-commits-to-east-london-crossings>

<sup>66</sup> London Bus Routes website by Ian Armstrong, Route 108A: <http://www.londonbuses.co.uk/routes/108a.html>

<sup>67</sup> London Bus Routes website, Route 395: <http://www.londonbuses.co.uk/routes/395-1.html>

<sup>68</sup> London Bus Routes website, Route 108: [http://www.londonbuses.co.uk/\\_routes/current/108.html](http://www.londonbuses.co.uk/_routes/current/108.html)

<sup>69</sup> Quality of Service Indicators - Lewisham <http://bus.data.tfl.gov.uk/boroughreports/lewisham.pdf>

<sup>70</sup> <https://www.change.org/p/increase-capacity-on-the-108-bus-route>

<sup>71</sup> *News Shopper*, 24 July 2014

[http://www.newshopper.co.uk/news/11364879.TfL\\_to\\_add\\_extra\\_service\\_to\\_ease\\_chaos\\_on\\_108\\_bus\\_to\\_Greenwich/](http://www.newshopper.co.uk/news/11364879.TfL_to_add_extra_service_to_ease_chaos_on_108_bus_to_Greenwich/)

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5.11.2 Indeed, TfL has risked making reliability worse by rerouting the 108 north of the river via the A102/A13 junction - which the transport assessment concedes has “high levels of delay”<sup>72</sup> - to run via Chrisp Street rather than the A12, adding 14 minutes to a northbound journey at midday on a weekday<sup>73</sup>.

### 5.12 Contradictory claims on public transport usage

5.12.1 TfL claims the number of journeys crossing the river at Blackwall/Silvertown would hardly change following the Silvertown Tunnel’s completion<sup>74</sup>. Yet TfL also claims route 108, which carried 3.3 million passengers in 2015/16<sup>75</sup>, would see a 25% increase in patronage if the Silvertown Tunnel were built because the route would have fewer delays<sup>76</sup>, and claims two new routes would each achieve 70-95% of the 108’s patronage<sup>77</sup>. This seems contradictory to us.

5.12.2 In any event, the possibility of introducing new bus services isn’t an argument for spending £1bn on a new road, this is an argument for expanding services through the existing Blackwall Tunnel - perhaps by introducing services that don’t suffer the delay of double-running via North Greenwich station.

### 5.13 TfL’s plans for bus services

5.13.1 But even taking into account the ability to run double-deck buses through a new tunnel, its indicative new network<sup>78</sup> does little to address current problems, and shies away from creating meaningful new links, particularly in relieving pressure on the Jubilee Line between North Greenwich and Canary Wharf.

5.13.2 The lack of capacity on the existing 108 corridor (particularly between Blackheath Village and Westcombe Park station) is not addressed in any meaningful fashion - the Grove Park to Canary Wharf service takes a diversion via Charlton, for example. This is the only service planned to serve Canary Wharf, and is scheduled to provide just four buses per hour to a major employment centre.

5.13.3 If delays at Blackwall Tunnel will be eliminated, as TfL so confidently asserts, why are there no new services planned for this tunnel, and just a small frequency increase for the 108?

5.13.4 Despite TfL talking up the option to use double-decker buses, one of the routes to be extended includes the 309, which uses single-deckers that are only 9.6m long<sup>79</sup>.

5.13.5 Indeed, with two services from East London - the 104a and 309 - set to run no further south than North Greenwich, rather than running onto destinations such as Blackheath, Charlton, Greenwich town centre or beyond. It appears TfL’s bus planners share our fears about the the effects of the Silvertown Tunnel on south-east London’s wider road network.

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<sup>72</sup> TR010021-000221-6.5 Transport Assessment, paragraph 4.2.38

<sup>73</sup> Current 108 timetable <http://londonbusroutes.net/times/108.htm> compared with last timetable before change <http://micarchive.www.idnet.com/times/100to149/108%2020160828.htm>

<sup>74</sup> TR010021-000221-6.5 Transport Assessment, paragraph 7.28

<sup>75</sup> Bus passenger usage data via <https://tfl.gov.uk/corporate/publications-and-reports/buses>

<sup>76</sup> TR010021-000221-6.5 Transport Assessment, paragraph 7.9.6

<sup>77</sup> TR010021-000221-6.5 Transport Assessment, paragraph 7.9.17

<sup>78</sup> TR010021-000221-6.5 Transport Assessment, paragraph 7.9.6

<sup>79</sup> Route 309 tender specifications <http://www.londonbuses.co.uk/Tender-specs/309.pdf>

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5.13.6 We would suggest that the draft Development Consent Order contains a commitment to a more comprehensive bus network, with a minimum level of service.

### **5.14 Proposals for cyclists**

5.14.1 The Scheme offers very little for cyclists; cyclists will not be permitted to use the tunnel and the risk of increased traffic in the wider area is likely to make conditions more dangerous for vulnerable road users.

5.14.2 The Panel will be aware of the Mayor raising the possibility of a “bespoke cycle bus”<sup>80</sup>; we find it hard to believe this will come to pass considering such a service failed as long ago as 1965, when specially-designed cycle buses were withdrawn from the Dartford Tunnel<sup>81</sup>. (A limited service remains available using Land Rovers, but is unavailable at various times of day including mid-morning.<sup>82</sup>)

### **5.15 Rotherhithe Tunnel and impacts on Maritime Greenwich World Heritage Site**

5.15.1 As outlined in section 4.5, we understand TfL’s modelling suggests traffic is unlikely to divert to Rotherhithe Tunnel to avoid charges. We feel this is unlikely to be the case.

5.15.2 If traffic does divert to Rotherhithe, the already vulnerable roads surrounding the World Heritage Site at Maritime Greenwich will be seriously affected.

5.15.3 Other areas will be affected: TfL’s 2014 consultation included forecasts of increased air pollution along the B207 Trundleys Road in Deptford and along A200 Lower Road to the Rotherhithe Tunnel<sup>83</sup>.

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<sup>80</sup> Mayor commits to building greener, public-transport focused crossings, Greater London Authority, 4 October 2016 <https://www.london.gov.uk/press-releases/mayoral/mayor-commits-to-east-london-crossings>

<sup>81</sup> The ill-fated cycle bus, National Archives, 21 November 2013 <http://blog.nationalarchives.gov.uk/blog/ill-fated-cycle-bus/>

<sup>82</sup> Dartford Crossing by bike, Gov.uk <https://www.gov.uk/guidance/dartford-crossing-by-bike-information-for-cyclists>

<sup>83</sup> The Effects of the Silvertown Tunnel, page 7: [https://consultations.tfl.gov.uk/rivercrossings/silvertown-consultation/user\\_uploads/the-effects-of-the-silvertown-tunnel\\_updated-2.pdf](https://consultations.tfl.gov.uk/rivercrossings/silvertown-consultation/user_uploads/the-effects-of-the-silvertown-tunnel_updated-2.pdf)

## **6. ECONOMIC CASE**

### **6.1 Uncertainty surrounding transport modelling**

6.1.1 It is difficult to assess the likelihood of the economic benefit forecast by the Applicant coming to pass. As we argue in our Modelling section above, while we understand that TfL believes its forecasts are the most likely outcome after sensitivity testing against different scenarios, there is no information presented on the confidence with which these estimates are made.

6.1.2 We note that TUBA - the model used for economic assessment - takes output from the transport models as a key input<sup>84</sup>. If these underlying transport models do not accurately forecast traffic volumes and flows, there can be no hope that the economic assessment will be correct. While information is presented on the economic outcomes if the economy is depressed at the forecast time, we can find no assessment of economic outcomes if traffic flow is higher than expected.

6.1.3 Time saved as the result of avoiding incident delays is included as an economic benefit derived from the Scheme: does this benefit take into account delays caused by incidents that take place on the shared approach roads on the northbound approach to the tunnels?

6.1.4 We note that the economic assessment includes a cost attributed to NO<sub>2</sub> pollution. This would seem to contradict assertions in other documents that the impact of the Scheme on NO<sub>2</sub> pollution is net positive. Is it therefore correct to assume that current modelling shows the Scheme will increase NO<sub>2</sub> pollution?

6.1.5 The Economic Assessment Report shows that, according to the applicant's assessment, heavy goods vehicles are the only types of vehicles to incur costs rather than receive benefits as a result of the Scheme<sup>85</sup>. This reinforces our argument that the Scheme is more likely to act to depress business investment in east and south east London than to act as a catalyst for regeneration.

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<sup>84</sup> TR010021-000236-7.8.1 Economic Impact Assessment, paragraph 6.2.1

<sup>85</sup> TR010021-000236-7.8.1 Economic Impact Assessment, paragraph 5.3.4

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### APPENDIX A: RESPONSES TO THE EXAMINING AUTHORITY'S FIRST WRITTEN QUESTIONS

**AQ9:** *Are the LPAs, No to Silvertown, PHE and other IPs (who have responded on air quality matters) satisfied with the mitigation proposed by the Applicant in relation to locations and sensitive receptors where there would be a significant impact in terms of predicted air quality changes arising from the development? If not, why not?*

The principal area which is likely to suffer deterioration in air quality is, of course, around the northern portal of the Silvertown Tunnel, and along Aspen Way.

We note, firstly, that TfL has done extensive testing, both for the 2012 Base Level and the Scheme-specific testing of 2014.<sup>86</sup> These indicate very poor air quality as matters stand, in areas where the scheme is likely to have the most impact.

We question whether the Applicant's modelled NO<sub>2</sub> concentrations for 2021<sup>87</sup>, for assessed and reference cases, are optimistic, given the difference between real-world and test results in emissions for Euro 6 vehicles and the difficulties in applying adjustments.

We note that TfL has not mapped or listed the sensitive receptors in the areas north or south of the proposed tunnel.

TfL's principal mitigation for air quality impacts depends on charging vehicles to control the volume of traffic. We have argued in Chapter 2 of this Written Representation that charging carries significant risks of failure. However, the area around the northern portal will be carrying, in effect, new traffic for the area, deriving from the rerouting of Blackwall Tunnel traffic.

The Applicant suggests that several other factors will help mitigate the effects of this new traffic.<sup>88</sup> However, the effects of these factors are unclear. Lower charges for low-emissions vehicles may help but as yet there is little evidence that the proportion of low-emission vehicles in use will increase.

Northbound traffic leaving the northern portal will include HGVs, which produce high levels of emissions. While buses will be Euro 6 emissions-compliant, the increase in numbers will offset any gains from that. Proposals to extend the planned Ultra Low Emissions Zone are still under consideration.

TfL suggests it is undertaking other London-wide measures to improve emission levels. These include hydrogen and electric buses; cycling improvements; cleaner taxi and minicab fleets; initiatives to improve lorry emissions; some competitive funds for local improvements; and awareness-raising measures.

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<sup>86</sup> TR010021-000165-6.1 Environmental Statement Tables 6.12 and 6.15

<sup>87</sup> TR010021-000165-6.1 Environmental Statement Table 6.17

<sup>88</sup> TR010021-000165-6.1 Environmental Statement Chapter 6.5.3-8

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Yet the purpose of the Silvertown Tunnel is to divert traffic from the Blackwall Tunnel, and it is inevitable that the growth in vehicle numbers around the northern portal will lead to poorer air quality, regardless of the mitigation measures described by the Applicant.

**AQ15(a):** *The ExA requests the Applicant, LPAs and other IPs (who have included representations about air quality in their RRs) to confirm that they are satisfied that the proposed development would not lead to a significant air quality impact? If not, why not?*

We are not satisfied that the proposed development would not lead to significant air quality impacts, for reasons that we have given throughout this Written Representation.

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### APPENDIX B: RESPONSE TO THE EXAMINING AUTHORITY'S RULE 17 LETTER

This refers to the recent Supreme Court judgment<sup>89</sup> on the UK government's air pollution policies.

*Is there any evidence that the conclusions of the Judgment would affect the Applicant's ability to deliver a development, which, if the Development Consent Order is made, would have no significant impact overall upon local air quality during the operational phase?*

We feel we do not have enough information to fully answer the question. However, on the evidence presented, it seems unlikely that TfL has done sufficient analysis to properly scope the risk that the tunnel will not make air quality worse in the light of the judgment.

As we understand the judgment given in *ClientEarth (No 2) vs SSEFRA*<sup>90</sup>, it says that in the light of emerging real-world data from Euro 6-standard vehicles, the Secretary of State's modelling does not use the correct base assumptions about emissions created by a given volume of traffic.

In its replies in the Environmental Assessment to questions from stakeholders<sup>91</sup>, TfL says its approach on modelling was to follow Highways England's policy given in IAN 175/13<sup>92</sup>. This advice note was issued in 2013, before the risk of underestimating NOx emissions after fleet upgrades to the Euro 6 standard was known.

We note that the Applicant has attempted to address the risk of underestimating NOx emissions in sections 6.3.95-99 of the Environmental Statement. However differences of language and terminology used across the judgment in *ClientEarth (No2)*, the Environment Statement and Defra's advice note IAN175/13 mean it is difficult to assess whether the correct assumptions have been made in the light of emerging data on emissions after fleet upgrades to Euro6 vehicles.

In fact, TfL relies on its intention to run Euro 6-standard buses in its answer to the Royal Borough of Greenwich as evidence of its intention to treat the Scheme's impact on air quality as an important consideration. That the use of these vehicles was treated as an appropriate mitigating action seems to be evidence that the flaws in the Euro 6 standard weren't known or considered at the time the air quality assessment was carried out.

We have no way of comparing Defra's faulty assessments with TfL's assessment of the air quality impact of the Scheme: it isn't clear if they are using the same estimate model (COPERT) for NOx emissions.

If the same model is being used, the Applicant should reassess likely emissions forecasts in the light of this new guidance. If a different model has been used, the Applicant should present evidence that the impact of underestimating emissions has been included in its calculations.

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<sup>89</sup> Green group wins air pollution court battle, BBC News, 2 November 2016

<http://www.bbc.co.uk/news/science-environment-37847787>

<sup>90</sup> <http://www.documents.clientearth.org/library/download-info/high-court-ruling-on-clientearth-no-2-vs-ssefra-uk-air-pollution-plans/>

<sup>91</sup> TR010021-000165-6.1 Environmental Statement Table 6.3

<sup>92</sup> <http://www.standardsforhighways.co.uk/ha/standards/ians/pdfs/ian175.pdf>

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### APPENDIX C: LETTER TO THE MAYOR OF LONDON, SADIQ KHAN

After the Mayor of London's recent announcement outlining his support for the Silvertown Tunnel<sup>93</sup>, we wrote to Mayor Khan to seek further details of the benefits for "local residents who use the tunnel", as the exact nature of these benefits could materially affect the Applicant's transport analysis.

We have not yet received a response.

Sadiq Khan, Mayor of London  
City Hall  
The Queen's Walk  
London, SE1 2AA

November 1, 2016

Re: Proposed Silvertown Tunnel

Dear Mayor Khan,

I am writing as chair on the No to Silvertown Tunnel Campaign, to ask you for clarification on a point very relevant to the current public inquiry into the Silvertown Tunnel proposal.

Just before the public examination into the scheme opened, you announced your support for the Silvertown Tunnel, although with modifications that you wish Transport for London to look into in respect of the scheme. Chief among them is your suggestion that there could be benefits for 'local residents who use the tunnel'.

We are very aware that TfL's Charging Statement, document 7.5, at 4.12, specifically rules out discounts for local residents. And while the 2014 public consultation raised the possibility of using some revenues from the crossing as a community fund to benefit local residents by ameliorating some effects from the new tunnel, this proposal was dismissed by TfL as difficult to administer, at the 2015 statutory consultation.

We therefore respectfully ask for an explanation of what you have asked TfL to review. Is it literally a discount on the charges for local drivers, or a revival of a community benefit scheme? And what is the timescale for TfL's look at possible benefits?

Yours faithfully,

Anne Robbins  
Chair, No to Silvertown Tunnel Campaign  
<http://www.silvertowntunnel.co.uk>  
[info@silvertowntunnel.co.uk](mailto:info@silvertowntunnel.co.uk)

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<sup>93</sup> Mayor commits to building greener, public-transport focused crossings, Greater London Authority, 4 October 2016  
<https://www.london.gov.uk/press-releases/mayoral/mayor-commits-to-east-london-crossings>