

No to Silvertown Tunnel [SILV - 227]

Deadline 3 Written Representation to Planning Inspectorate 27 January 2017

1. MITIGATION, MONITORING AND CHARGING

We have reviewed the revised versions of the Traffic Impacts Mitigation Strategy (TIMS, REP2-031), the Monitoring Strategy (REP1-121) and the Charging Policies and Procedures (REP1-123). The comments that follow are based on Revision 1 of these documents.

1.1. Scope of mitigation strategies

1.1.1. It is not clear how TfL or the Silvertown Tunnel Implementation Group (STIG) will decide whether they should attempt to mitigate the effects of the scheme by altering the user charge or taking some other action.

1.1.2. Furthermore, figure 2.4 of TIMS and figure 3.2 of the Monitoring Strategy suggest the scope of issues that might be mitigated is limited to those issues caused by the Scheme.

1.1.4. We suggest the correct scope of issues to be mitigated by the scheme is “all issues that could be mitigated by action taken within the Scheme”.

1.1.5. This is because the proposed monitoring areas vary depending on the issue. The area covered by additional air quality monitoring is not the same as the area covered by additional noise monitoring.

1.1.6. We also note that neither TIMS nor the Monitoring Strategy explicitly links measuring the Scheme’s outcomes with the proposed project outcomes. This seems a clear oversight.

1.2. The monitoring strategy

1.2.1. The Monitoring Strategy promises study of traffic flows, air quality, noise and socio-economic indicators. The Charging Policies and Procedures suggest changes to user charges may address any issues in these categories.

1.2.2. However, the mitigation triggers in Appendix 1 of TIMS Revision 1 do not address these categories. Rather, mitigation will be triggered based on measures of traffic flow, vehicle composition, journey time/reliability, queues and usage, bus reliability, road safety and junction performance.

1.2.3. It seems clear that if TfL is monitoring, for example, air pollution, and it has accepted it has a responsibility to take a mitigating action (ie, revise user charges) if air pollution worsens, the process needs to account for a mitigation trigger for air pollution.

1.2.4. In section 2.2.6 of TIMS, TfL argues that air quality monitoring may give volatile results as air pollution is affected by the weather. If air pollution is at a dangerous level and TfL has the ability to lessen the impact, it should do so, regardless of whether the levels of pollution would be better at another time of year, all other things being equal.

2. WRITTEN SUBMISSION OF ORAL CASE

At the Issue Specific Hearings held on 17, 18 and 19 January 2017, we presented views and comments. These are summarised here.

2.1. We outlined our position that the Silvertown Tunnel is a very risky proposition, likely to concentrate congestion rather than lessen it. We noted TfL has admitted its original modelling failed to include overheight vehicles travelling northbound, which will add to pressures on noise and air quality along the whole of the A2/A102 corridor and the areas around the northern portal.

2.2. We also questioned whether the baseline data collection of traffic and air quality levels would be artificially inflated by construction traffic generated by the project.

2.3. We noted the problem of optimism bias, and asked that the Inspectors review the Applicant's tolerance for cost exceedance.

2.4. We also reiterated our view that selective benefits for alleviating user charge costs risk the ability to manage congestion, although local residents will look at the personal impacts and bring political pressure to bear.

2.5. Discussion at the hearing suggested that TfL does not see a pressing need to deliver any type of support package for local residents, and suggests it is unnecessary as its economic modelling shows that low-income local residents will, on the whole, receive an economic benefit as a result of the Scheme.

2.6. We suggest that charging residents of east and south east London to cross the river where equivalent income groups in other parts of London do not pay an equivalent charge will not be perceived as fair or advantageous - even if TfL's economic modelling is precisely right.

2.7. Residents south of the Thames may perceive an even greater burden as - if working traditional working hours - they will pay double owing to the suggested peak flow charging arrangements.

2.8. If the Scheme is to go ahead without significant tangible benefits to local residents, we suggest that political pressure is likely to be applied to TfL to keep charging affordable. In turn, this will make TfL less likely to be able to successfully manage traffic volumes by altering the user charge.