

Silvertown Tunnel Development Consent Order

London Borough of Hackney

Comments on Certified Documents and Development Consent Order (Deadline 6 Submission)

5th April 2017



Hackney has major concerns with the Monitoring and Mitigation Strategy the Bus Strategy and the Charging Policies and Procedures which are classified as a 'certified documents' in the DCO application process. With the DCO wording itself changes made by TfL have addressed some of its earlier concerns but there are some remaining issues.

Monitoring and Mitigation Strategy

Following the Issue Specific Hearing on 'Outstanding Matters including Environmental Matters' held on Tuesday 28th March 2017, this is LB Hackney's post-hearing written account of oral submission made on the day. Following the meeting the Applicant also met with LB Hackney once again on 4th April but there appeared to be no substantive change on the subject of air quality monitoring which is one of main issues detailed below. The following also provides a general update of the borough's concerns at Deadline 6.

Agenda Item 5.2

Please can the neighbouring authorities provide their views on the updated/combined Monitoring and Mitigation Strategy [REP4-046], initially in relation to whether the proposed monitoring locations now cover all of the areas that they have raised as being of concern, including Old Kent Road, New Kent Road and Tower Bridge (LB of Southwark); Wick Road, Kenworthy Road, Cassland Road, Victoria Park Road as well as the A12 (LB of Hackney); B218, A21, A2212 (LB of Lewisham).

LB Hackney is pleased that TfL now proposes to carry out traffic monitoring on four borough roads of concern to Hackney (**Wick Road, Kenworthy Road, Cassland Road and Victoria Park Road**). However we remain extremely disappointed that no air quality monitoring is proposed and we request co-location of traffic and air quality monitoring.

Hackney and many other host and neighbouring boroughs have never expressed full confidence in the traffic levels predicted in the Assessed Case scenario and this concern remains and is exacerbated by the decision to allow user charge discounts for low income users in the Host boroughs and the potential discount for motorcyclists – the granting of both of which exemptions have been opposed by Hackney in their current form.

Hackney's concerns should also be seen in the context of high existing volume to capacity (VCR) levels on **Wick Road, Kenworthy Road, Cassland Road and Victoria Park Road** especially in the PM peak meaning that a relatively small increase in traffic could lead to a large rise in congestion and related air quality issues. This is particularly pertinent as it is an admitted feature of Silvertown scheme that while traffic levels through the tunnels over the course of the day are

predicted to be at a lower level than in the 2021 reference case, this is not the case for peak hour when relief on congestion allows for a higher flow through the tunnels in a shorter period than the peak currently lasts for. While this so-called 'compressed peak' does not affect 'tunnel performance', a reasonable observer might well surmise that the problem (or the risk of a problem) could arise when this increased traffic leaves the trunk roads such as the A12 and the A102 onto smaller lower capacity congested local roads such as the four roads mentioned above. Another level of uncertainty is introduced into predicting resultant air quality when the uncertain increased levels of traffic are fed into uncertain air quality models containing pollutant diffusion algorithms.

It is relevant in this context to reiterate the considerable opposition that exists in Hackney to scheme as evidenced by the Hackney Council motion of 22nd July 2015. This motion reads:

17.1) No to Silvertown Tunnel Motion

The Council notes that;

- 1. TfL have consulted on building a 4 lane tunnel at Silvertown next to, and in addition to, The Blackwall Tunnel, which Mayor Johnson says will double road capacity across the Thames at this point and help ease congestion.***
- 2. As stated in a previous motion passed by Hackney Council in February this year, it is widely acknowledged that you cannot build your way out of congestion and that a more appropriate strategy would be to improve conditions for walking and cycling as well as make public transport more affordable.***
- 3. The additional road capacity would lead to a significant increase in motor traffic in Hackney and significantly worsen air quality in this borough.***
- 4. Hackney and London already suffer from poor air quality and building this tunnel is totally incompatible with Hackney and London meeting their air quality targets.***

Therefore Hackney Council Resolves;

- 1. To oppose the building of the Silvertown Tunnel.***
- 2. To ask The Mayor of London to work on a plan that recognises the need to improve air quality and that any Thames crossing must not be to the detriment of this aim.***

If the Applicant is confident in its own traffic monitoring then agreeing to air quality monitoring at the sites mentioned in Hackney will not lead to any required mitigation and would have the benefit of providing reassurance to a borough where significant doubts about the scheme remain. What is more the cost of this monitoring would be relatively low estimated at just over £40 per diffusion tube per year.

LB Hackney repeats its request for air quality monitoring on sites on **Wick road, Kenworthy Road, Cassland Road and Victoria Park Road** co-located with the traffic monitoring already agreed by the Applicant.

Bus Strategy

Paragraph 2.2.3, Commitment 1

As stated in its Deadline 5 submission LB Hackney is unhappy with paragraph 2.2.3 of the strategy because of the exclusion of concessionary bus travel from residents of the Hackney who in some areas live closer to the tunnel than residents of the host boroughs. We request this issue is addressed by the Applicant.

Charging Policies and Procedures

Paragraph 2.3.7, Policy 6

Notwithstanding Hackney reservations about offering 50% user discounts to low income residents without adjustments in charges to other user groups to “restore” the levels of traffic predicted in the Assessed Case, the borough believes it unfair to exclude residents of Hackney living closer to the tunnel than some residents of the host boroughs. We request that this issue is addressed by the Applicant.

Development Consent Order

Article 65, clause 5(e)

As detailed in our Deadline 5 submission, we remain concerned that clause 5(e) of this article describing STIG's role in "reviewing TfL's proposals for cross-river bus services through the Silvertown Tunnel" has been deleted. The explanation given by TfL appears to be that bus services will deal with only with the boroughs affected, this seems to rule out a strategic approach to reviewing bus provision in STIG. This was mentioned in Hackney's Deadline 5 submission in response to the Second Written Question DC2.7.

Requirement 13

As detailed in our Deadline 5 submission LB Hackney remains concerned that the commitment to provide 20 buses per hour through the tunnel falls far short of the 37.5 buses per hour modelled in the Assessed Case.

