

# No to Silvertown Tunnel [SILV-227]

## Deadline 6 Written Representation to the Planning Inspectorate

5 April 2017

### 1. Blackwall/Silvertown Tunnels and the proposed Ultra Low Emission Zone extension

1.1 At the Issue Specific Hearing on 28 March 2017, we asked a question regarding the possibility that the Blackwall and Silvertown Tunnel approach roads might be exempted from the proposed Ultra Low Emission Zone (ULEZ) extension. We are grateful the Examining Authority has made our question an Action Point.

1.2 Our question arises from the Deadline 3 statement from the London Borough of Newham [REP3-035], which says:

*“There are a range of traffic management controls that should be considered beyond demand control through charging. This would include agreement to adopt standards of the future London Ultra Low Emission Zone (ULEZ) if the conclusion of the proposals encapsulate the Silvertown/Blackwall tunnel area. The ULEZ, which is currently the subject of discussions within TfL, GLA and other stakeholders, proposes that the zone would be based on the North and South Circular Roads. This proposed boundary carries within it an exemption for the Blackwall Tunnel and approach roads, as well as the proposed Silvertown Tunnel and its approach roads. The Council considers that as such, TfL should create an “air quality focus area” in the area surrounding the tunnel portal. This could then allow for additional actions to be developed to offset the impact of the development, which as an example, could include the introduction of ultra low emission buses in the area which are not just those using the Silvertown Tunnel.”<sup>1</sup>*

1.3 We strongly object to any exemption for the Blackwall and Silvertown Tunnel approach roads, on the basis of likely effects on air quality.

1.4 We understand the extension to the ULEZ is not part of this public examination. However, any exemptions should be considered in relation to the traffic and air quality modelling. We believe these impacts have not been accounted for in TfL’s modelling.

1.5 There is a clear danger that drivers who might otherwise be charged under the ULEZ scheme would switch their journeys to the Blackwall and Silvertown Tunnels. This would make it even more difficult for Transport for London to achieve its stated aim of not increasing traffic on this route.

### 2. Oral statement from the Open Floor Hearing, 28 March

2.1 We were grateful for the opportunity to give our final oral statement. Here is a summary.

2.1.1 We pointed out that motorcycles already have traffic impacts on the Blackwall Tunnel.

2.1.2 Motorcyclists’ lobby groups pressing for zero ratings and the host boroughs demanding discounts on behalf of their lowest income residents are chipping away at the proposed user charging scheme for the Blackwall and proposed Silvertown Tunnels.

---

<sup>1</sup> TR010021-001240, London Borough of Newham, p. 24.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010021/TR010021-001240-London%20Borough%20of%20Newham.pdf>

## **No to Silvertown Tunnel [SILV-227]**

### **Deadline 6 Written Representation to the Planning Inspectorate**

5 April 2017

2.1.3 From the start of this examination, we have maintained that the user charge is vulnerable to political and social pressure - even though it is the Applicant's only strategy to mitigate against induced traffic. We feel our point is being proved. The Applicant now proposes a discount for local low income residents, yet this proposal comes before there is widespread public knowledge of the proposed charging regime. Political pressure to discount user charges, which would weaken the ability of the Applicant to manage demand for the Blackwall and Silvertown crossings, is likely to increase once the Scheme is in operation.

2.1.4 At the same time, support for cyclists and pedestrians remains very poor compared to motor vehicles.

2.1.5 We therefore reiterate our grave concerns about the risks of this project, as set out in our previous statements.

2.1.6 We do not believe the Applicant has made the case that it can control traffic via a user charge while its modelling is being undermined by tinkering with this charge. It may prove that when setting the appropriate user charge, there is no way for the Applicant to be flexible enough to take local concerns into account while remaining responsive enough to changes in demand.

### **3. The bus strategy**

3.1. Since our first written representation, we have been sceptical about the Applicant's commitment to creating meaningful new bus links through the tunnel<sup>2</sup>. We note that since then, a commitment to include 20 buses per hour in each direction at peak time - including the six per hour which already run on route 108 - is planned to be written into the Scheme. This is less than the figure of 37.5 buses per hour that features in the Assessed Case.

3.2. At the Issue Specific Hearing on 28 March, the Examining Authority suggested that the bus services suggested for the Silvertown Tunnel may be a mitigation measure rather than a core part of the Scheme. We believe they are just a mitigation measure. The vagueness of what has been proposed does not create confidence that this is anything other than an attempt to make an ill-thought-through new road appear less harmful to the communities it will affect.

3.3. It is concerning that TfL's counsel told the Examining Authority that forcing it to fulfil its Assessed Case proposal of 37.5 buses per hour could result in cuts to services elsewhere. ("The pot is only so big – other bus services would have to be pulled.") If TfL is not able to commit to its proposals to mitigate the effects of the Scheme, it should not be submitting it in the first place.

3.4. Fewer buses through the tunnel also represent yet another risk to TfL's traffic modelling; many car journeys through the existing Blackwall Tunnel are made because public transport connections remain relatively poor, as we outlined in our initial Written Representation<sup>3</sup>.

---

<sup>2</sup> REP1-059, Paragraphs 5.10 to 5.13, TR010021-000664 No to Silvertown Tunnel Written Representation  
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010021/TR010021-000664-No%20to%20Silvertown%20Tunnel.pdf>

<sup>3</sup> REP1-059, Paragraph 5.9, as above.

## **No to Silvertown Tunnel [SILV-227]**

### **Deadline 6 Written Representation to the Planning Inspectorate**

**5 April 2017**

3.5. It also concerning that TfL appears to be considering removing Canary Wharf from the network of destinations served by Silvertown Tunnel bus services<sup>4</sup>, particularly with new residential developments near North Greenwich (and at Canning Town, West Ham and Stratford) placing additional pressure on the already extremely busy Jubilee Line.

3.6. Canary Wharf has a working population of 112,000 people<sup>5</sup>. It is by far the most popular destination for passengers who use North Greenwich underground station, with 5,843 trips between the two stations made on a weekday in February 2017<sup>6</sup>. It is also well-served by privately-run commuter coaches from Kent. It seems peculiar that TfL would now attempt to row back on a plan to link Canary Wharf by bus from areas south of the river, considering the huge demand to reach this area by public transport.

3.7. We do not believe that spending £1bn on a road tunnel is the correct solution<sup>7</sup>. However, we would suggest that the Development Consent Order include some locations that should be served by any bus network serving the Silvertown Tunnel for a given number of years, for example, London City Airport or Greenwich town centre. These locations should include Canary Wharf.

---

<sup>4</sup> REP5-002 - TR010021-001547 Buses Minimum Opening Year Scenario Analysis

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010021/TR010021-001547-TfL%208.103%20Buses%20Minimum%20Opening%20Year%20Scenario%20Analysis.pdf>

<sup>5</sup> Canary Wharf Group: <http://group.canarywharf.com/about-us/>

<sup>6</sup> Journeys made on 22 February 2017. Stratford and London Bridge were second and third most popular destinations, with 2,997 and 2,899 trips made respectively. Answer supplied by TfL in response to Freedom of Information request 2323-1617: [https://www.whatdotheyknow.com/request/destinations\\_from\\_north\\_greenwic](https://www.whatdotheyknow.com/request/destinations_from_north_greenwic)

<sup>7</sup> Want to regenerate Greenwich Peninsula properly? Build a walking and cycling link to Canary Wharf - No to Silvertown Tunnel, 7 May 2015:

<http://www.silvertowntunnel.co.uk/2015/05/07/want-to-regenerate-greenwich-peninsula-properly-build-a-walking-and-cycling-link-to-canary-wharf/>