

## **No to Silvertown Tunnel: Response to 2015 Silvertown Tunnel consultation**

**Introduction:** No to Silvertown Tunnel is a campaign set up to oppose Transport for London's plans to build a road tunnel between the Greenwich Peninsula and the Royal Docks. The campaign grew out of a petition against the scheme in December 2012. Since then, we have conducted three "citizen science" air pollution surveys in south-east and east London, lobbied local politicians and consulted with community groups as well as pollution and transport experts.

We believe improving public transport as well as pedestrian and cycling connections in this area should take priority over new roads. We have called for the construction of a walking/cycling connection between Canary Wharf and North Greenwich, and an extension of the London Overground from Barking to Thamesmead and Abbey Wood. We have also backed others' calls for a Bakerloo Line extension to Lewisham, Catford and Hayes and a walking/cycling bridge between Rotherhithe and Canary Wharf.

Our campaign website has more details: [www.silvertowntunnel.co.uk](http://www.silvertowntunnel.co.uk)

**A note for clarity:** When we refer to "east London", we mean areas north of the Thames. "South-east London" refers to areas south of the river.

**Do you support the Silvertown Tunnel scheme as a means to address congestion and closures at the Blackwall Tunnel, and support future growth in London? If you have any comments about our intention to apply for consent to build and operate the Silvertown Tunnel scheme, please let us know in the space below.**

1.1. We do not support this scheme. The planned scheme will not reduce congestion. Instead, it is very likely to increase southbound congestion on the A102 and A2, as well as general congestion on the A1261 Aspen Way and the A1020 at Leamouth Road, Lower Lea Crossing and North Woolwich Road. It is also likely to increase congestion on surrounding roads. London's future growth would be better secured by investment in public transport provision.

1.2. It is inappropriate that this statutory consultation is taking place on the strength of preliminary assessments. This means environmental risks to the surrounding areas have not been fully assessed in this, the final public consultation. The public and stakeholders are not being presented with the final assessments they need to make an informed decision.

**Connections to the existing road network: We have described the proposed design of new junctions to link the tunnel to the existing road network. If you have any comments on the design of these new junctions please let us know in the space below.**

2.1 The only changes envisaged to the existing road network are in the immediate vicinity of the proposed tunnel. The consequences of the scheme further north and south are not being taken into account.

2.2 The planned widening of the Blackwall Tunnel Southern Approach fails to include provision for the inevitable increased traffic heading for the two tunnels. Junctions on the A102 and A2 further south, for instance at the Sun-in-the-Sands, are already under considerable pressure, and are set to remain so. Residents' concerns on this issue are so considerable that many fear the loss of their homes in the future.

2.3. 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>1</sup>. This extra strain will result in considerable additional expenditure to ensure their safety.

2.4 North of the Thames, the proposal to elongate the Tidal Basin Roundabout - where there are many homes under construction - will result in a sharp decline in the area's air quality and a huge increase in noise pollution.

2.5. Currently, entry and exit roads to this roundabout and links to the A12 and A13 are narrow and complex. These roads are likely to become congested and development in the area will not enable any changes to the layout.

**Construction impacts: Our proposals for constructing the Silvertown Tunnel are at an early stage, although we have included our initial thoughts on what temporary road closures and diversions might be necessary. If you have any comments on our construction proposals and their potential impacts please let us know in the space below.**

3.1. If the Silvertown Tunnel's biggest flaw is its reliance on the A102/A2 corridor, then this will be exposed by four years of disruption if construction goes ahead.

3.2. Public transport users and residents of Greenwich Millennium Village, City Peninsula and other developments will bear the brunt of this, with the closure of Edmund Halley Way seriously affecting the road network near North Greenwich station and the O2.

3.3. TfL may be committed to maintaining car parking levels at the O2, but events here already cause huge disruption for travellers using North Greenwich station. Expecting car traffic to use West Parkside and John Harrison Way will hold up buses even further, as well as subject travellers and local residents to increased levels of pollution.

3.4. Considering the current disruption that O2 events cause, to say closing Edmund Halley Way will have no effect on the operation of North Greenwich station is a risible claim.

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<sup>1</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>

3.5. The effects of 200 lorries per day on the Silvertown worksite (as noted in paragraph 6.3.10 of the Preliminary Transport Assessment) will harm the environment for those moving into new developments in this area.

3.6. While the Greenwich side will see fewer movements, the peak period of 140 lorries per day will add to the noise pollution faced by those who live near the A102, particularly around Westcombe Hill and Siebert Road.

**User charges: As part of our plans for the new Silvertown Tunnel we are proposing to apply a user charge to both the existing Blackwall Tunnel and the proposed new tunnel in order to manage traffic demand and pay for the new tunnel to be built. The level of the charge would be set closer to the time that the Silvertown Tunnel opens, taking account of the conditions that exist at that time. Further details are set out in the ‘Preliminary Charging Report’, which is available to download. If you have any comments on our proposals for user charging please let us know in the space below.**

4.1. The Preliminary Charging Report argues that charging road users to use the new Silvertown Tunnel as well as the existing Blackwall Tunnel will be required for two reasons:

- a) To pay for the construction costs of the tunnel.
- b) To manage demand for road traffic to cross the Thames at the Greenwich Peninsula.

There is little point discussing the first point in any detail as it is an entirely circular argument. TfL argues that the scheme cannot function without the imposition of charges. Therefore it seems likely the project would not go ahead unless charges are accepted, and so tolls must be applied to pay for the construction of a tunnel that is not workable without them.

#### Demand management

4.2. The Preliminary Charging Report (PCR) argues that induced traffic will mean that the new tunnel and the Blackwall Tunnel will be more congested – causing more pollution – unless charges are applied, meaning fewer drivers will choose to use the tunnels. It argues that user charging is “required to manage traffic demand and ensure the environmental impacts of the Scheme are properly managed”.

4.3. We agree that building the Silvertown Tunnel without attempting to manage demand for the crossing would be disastrous for the local area. As the PCR suggests, there would be an unbearable increase in congestion on the road network.

4.4. The PCR sets indicative prices for user charging and discusses the risks if the charges are set too high (road traffic is displaced to other crossings, in turn increasing congestion and removing overall benefits) and if the charges are set too low (overall trips via Blackwall and Silvertown Tunnels would increase, thus removing benefits of the scheme). But there is no detail in the PCR to demonstrate how TfL has arrived or will arrive at the correct pricing to ensure the number of users of both tunnels falls within their modelling.

#### Process to set and vary the charge

4.5. The correct price to limit the number of users to those foreseen in TfL's reference case can only be arrived at by constantly changing the price until equilibrium is reached.

4.6. The PCR does not give enough detail about who would have approval powers for any change of price.

4.7. The PCR does not acknowledge that there is a political dimension to any pricing decision. Future administrations - the mayor and/or TfL itself, or their successors if London's governance changes - may come under pressure to reduce the user charge to a level where demand is no longer effectively managed. It is already clear to observers that there are high levels of demand to cross the river by road at Blackwall, and it may be that the equilibrium price to manage demand could never be politically acceptable.

4.8. If, for example, experience shows that demand to use the new road capacity continues to rise until using the tunnels as a private car driver costs £20, it seems unlikely that TfL could or would ever set user charges at this level.

4.9. There is a precedent for the cancellation of planned user charges that were seen to be politically undesirable: the westward extension of the central London congestion charge was cancelled by Boris Johnson shortly after his election as mayor.

4.10. Removing user charges is much easier to achieve than stopping the use of a newly built tunnel. This means that the entire benefit case of the tunnel is vulnerable – TfL, as the proposer, has argued that the scheme is not workable without charges.

#### Supporting growth of the local population and economy

4.11. Small local businesses will be particularly impacted by the imposition of user charges, as no other road crossing in London will have user charges applied to drivers. This means that businesses that wish to cross the river are immediately disadvantaged in relation to other businesses in the capital if they have their base in east or south-east London.

4.12. In addition, user charging represents a higher marginal cost to small businesses than it does to larger businesses. Larger businesses choosing to make regular river crossings need not have their base in the affected area so could avoid cost implications, but if they do, user charges will form a smaller proportion of their costs.

4.13. The purported benefits to local businesses in terms of decreased journey time and increased reliability are entirely dependent on TfL finding the equilibrium price for user charging. This makes benefits to these users particularly vulnerable.

#### Particular impact to residents of south-east London and Kent

4.14. The PCR proposes differential pricing based on peak and non-peak flows. Peak flows are northbound traffic on weekday mornings and southbound traffic on weekday evenings. As a result, those who live or have their base in either south-east London or Kent but work north of the Thames are particularly disadvantaged by the pricing proposals.

4.15. As south-east London is particularly underserved by public transport, those living in south east London are given fewer options to avoid use of the tunnel. This dependence on road travel is likely to be a brake on further residential development of the area.

#### Indicative charging and providing an incentive for the use of public transport

4.16. In any comparison of public transport charges with the indicative user charges given in the PCR for car drivers, use of the road crossings is incentivised. 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.

4.16.1. At off-peak charging, cars need 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.

4.16.2. Any of the shortest possible tube or DLR crossings starting on the south side of the Thames between Deptford 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.

4.16.3. 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).

4.16.4. This comparison of costs above also holds for the reference journey – Lewisham to Stratford – given in documents from this and earlier consultations.

4.16.5. 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.

4.16.6. 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.

4.16.7. We haven't attempted to compare longer journeys. Most journeys from south east London are likely to be longer than these reference journeys, which are the shortest possible trips on public transport that include a river crossing. However, the costs above demonstrate

that user pricing at the levels foreseen do not adequately incentivise the use of public transport rather than driving through Blackwall/Silvertown.

#### Risk of traffic increase on local roads at time-boundaries for user charges

4.17. It seems likely that drivers would wish to avoid paying tolls where possible. This would lead to increased local traffic on both sides of the crossing as drivers near to the crossings attempt to wait for short periods of time until a cheaper toll is available. This risk is not considered in the preliminary charging document.

**Environmental effects: We have described the likely environmental effects of the Silvertown Tunnel scheme and described some mitigating measures we would take. Further details are set out in the 'Preliminary Environmental Information Report' (PEIR), which is available to download. If you have any comments on the likely environmental effects of the scheme and the proposed mitigation measures, or on any of the information set out in the PEIR, please let us know in the space below.**

5.1. We do not feel that adequate information has been given on the likely environmental effects of the proposal, considering we are now at this advanced stage of the consultation, being the final chance for the public to comment before the Development Consent Order (DCO) application in spring 2016.

5.2. Since full environmental studies have still not been completed, it is reasonable to conclude that the papers rely on the assertion of untested hypotheses. This is hinted at within the report: "A definitive judgement has not been made in terms of the overall significance of the Scheme ... as further modelling will be required."

#### Effects of construction on surrounding communities

5.3. If it is not possible to remove construction waste by river, the traffic impact will be massive: 226,800 HGV movements with surrounding roads seeing significant increases in HGV traffic over a long construction period. Furthermore, it is proposed that there will be 280 car parking spaces for the site staff to use, resulting in a further significant number of vehicle movements. The report recognises that construction HGVs present significant risks, but there is little that actually addresses these risks.

#### Inadequate air quality modelling

5.4. Regarding air quality, we are dismayed that the impacts will not be fully assessed until the public are no longer being fully consulted. The Preliminary Environmental Information Report concludes it is inappropriate, based on the current limited modelling, to reach a definitive decision on significance at this stage. The impacts on air quality of the construction phase - significant dust, waste, exhausts from machinery, generators - have not been assessed at all.

5.5. The assessments of air quality show any reduction of pollution is insignificant and unfairly distributed when comparing the reference case and the assessed case. These analyses are also totally dependent on the ability of tolling to effectively limit the amount of traffic that would use the crossing and keep that traffic moving. There are significant risks that more drivers than foreseen will use the new tunnel, or would travel through adjacent neighbourhoods to opt for the nearest free crossing instead.

5.6. The assumption that air quality could be improved by keeping traffic moving is based on evidence that idling vehicles cause more pollution than free-flowing ones. If the same congestion seen today remains, with even more vehicles, the supposition about emission levels from flowing traffic is irrelevant.

#### Air quality monitoring sites and compliance with EU law

5.7. The PEIR lists air quality monitoring sites and determines whether the assessed case shows an improved forecast for each site against the reference case. It then goes on to argue that a majority of sites are forecast to record lower levels of nitrogen dioxide pollution. This is the wrong basis for comparison. There needs to be an assessment of whether the current pollution monitoring sites represent the best model of real-world distribution of nitrogen dioxide for it to follow that a comparison of sites in this manner can indicate an improvement in air quality.

5.8. The document emphasises whether locations monitored for air quality are likely to breach compliance levels. This suggests the project will be assessed by whether compliance is reached rather than by whether it actually safeguards public health, which will be affected by increases in nitrogen dioxide whether or not they pass the 40 µg/m<sup>3</sup> EU compliance limit.

5.9. In addition, the test of compliance under TfL's model would be to find all locations that are currently close to the compliance limit of 40 µg/m<sup>3</sup> and assess whether they would breach the limit under forecasts. We note that in the forecasts provided, none of the monitored locations that currently show nitrogen dioxide levels of >38 µg/m<sup>3</sup> are forecast to increase beyond 40 µg/m<sup>3</sup>. However, it does not follow that there are no locations at all in the affected area that will not breach the compliance limit as a result of the scheme.

5.10. The 2014 consultation included a map of air pollution impacts over a wide area<sup>2</sup>, showing increases in pollution in New Cross, Deptford, Rotherhithe (from traffic heading via Trundleys Road to Rotherhithe Tunnel), areas covered by both Lewisham and Southwark Councils, which have not benefited from the same level of consultation as Greenwich, Newham and Tower Hamlets. The 2014 map also shows pollution increases from the Silvertown Tunnel itself, most notably in the Royal Docks and Poplar. Why is there no further information on this wider impact in this consultation?

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<sup>2</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)

### The financial cost of air pollution

5.11. As above, the comparison is made on the basis of the number of sites that show an improvement in nitrogen dioxide levels, yet the true measure of improvement is the difference in expected net volume of nitrogen dioxide between forecasts. We note that the reference case would also show an improved net volume from the selected sites, but also that the Preliminary Economic Assessment shows a cost of £0.27m assigned to air quality.

5.12. It is not clear how a model that forecasts improved net air quality can also forecast an eventual cost due to air quality issues. Nor is it clear what this cost represents: does this represent the full impact on health due to poor air quality, including time lost to ill-health or early mortality?

### Contamination on Greenwich Peninsula

5.13. There are serious concerns about the thoroughness of any assessments done at this stage regarding the possibility of contamination under the Greenwich Peninsula, as highlighted in National Grid and Scotia Gas Networks' response to the 2014 consultation<sup>3</sup>. A large part of the peninsula will be dug up and transported away, while at the same time more new residents will be arriving and further development will be taking place. There is no reassurance here that the possibility of contamination has been assessed, and that any contamination discovered will not impact widely on the peninsula.

### Noise pollution and visual impacts

5.14. It is disappointing that only minor mitigations such as low noise surfacing are offered. There is already a significant environmental problem due to noise levels and elevated levels of noise during construction, as well as the impact of more vehicles in operation phase (even if they are passing more quickly), will add to this. Visual and acoustic barriers that are seemingly to protect local residents are themselves extremely unattractive and can affect views and "sense of place". Prioritising the needs of motor traffic means that the surrounding area is likely to become even less attractive to pedestrians and cyclists.

5.15. It is remarkable that all of the visualisations ignore the extremely likely impact of (even if we accept TfL's case at all) heavy volumes of traffic on more, wider roads: they are unrealistic to the point of fantasy. Pictures of the future landscaping at the tunnel's north portal make it look like it is the middle of a park rather than a footway in the midst of an expanse of concrete.

### Rotherhithe Tunnel

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<sup>3</sup> National Grid/ Scotia Gas Networks response to 2014 consultation:  
[http://www.silvertowntunnel.co.uk/wp-content/uploads/2015/11/SGN\\_response.pdf](http://www.silvertowntunnel.co.uk/wp-content/uploads/2015/11/SGN_response.pdf)

5.16. The risk of drivers diverting through Greenwich towards the Rotherhithe Tunnel seeking to avoid tolls would also add to already considerable congestion around a UNESCO World Heritage Site.

5.16. Traffic avoiding tolls would also add to congestion in areas such as Poplar and Limehouse, which have high population density and already suffer dangerous levels of pollution.

#### Marine ecology

5.17. We are concerned about the potential effect on the marine ecology caused by the formation of a jetty on the Silvertown side of the river. Significant work, such as piling, dredging and disposal of dredged material must take place to build this, presenting a high risk of significantly altering the nature of the existing water course.

**Traffic impacts: We have described the traffic impacts of the Silvertown Tunnel scheme and explained that we would monitor its effects on traffic before and after opening. Further details are set out in the 'Preliminary Transport Assessment' and 'Preliminary Monitoring and Mitigation Strategy', which is available to download. We would take appropriate measures to mitigate any negative effects that might occur as a result of the scheme. These measures could involve adjusting traffic light timings or other traffic management measures. If you have any concerns about the effect of the Silvertown Tunnel scheme in any particular location, or comments about how we might mitigate these, please let us know in the space below.**

6.1. Once built, the Silvertown Tunnel cannot be unbuilt. TfL admits traffic impacts will be felt far and wide, as far out as Orpington according to its junction impacts study. Whatever traffic management scheme TfL adopts, if it is not successful, neighbourhoods across London will pay the price for many years to come. Effectively, any mitigation will just be tinkering at the edges.

6.2. Even if TfL's modelling is correct, we still remain deeply concerned about the Silvertown Tunnel's impact on the road network both north and south of the Thames.

6.3. TfL itself admits that building the tunnel will increase traffic - indeed its whole strategy for tolling is put in place to manage that increase. However, despite this it has accepted that some local roads will be subject to an overall increase in traffic.

#### Silvertown Tunnel and effects on Blackwall Tunnel and beyond

6.4. We note heavy counter flows in the morning rush hour (Preliminary Transport Assessment (PTA) paragraph 4.2.24), heading from north to south. It seems bizarre to charge these travellers a cheaper rate than those heading south to north, and can only exacerbate the impacts of the scheme south of the Thames.

6.5. The modelled traffic flows in the preliminary transport assessment are selective, and do not include important factors such as weekend usage of the tunnels, when tolling will not apply, despite the likelihood of the area being overwhelmed with traffic. Nor does it consider the impact of retail developments (Westfield Stratford City or Ikea's planned Greenwich store) along with existing leisure and sporting activity in the area (ExCeL exhibitions, O2 Arena events, football at Charlton Athletic or West Ham United, etc).

6.6. TfL appears to be aiming to get traffic through the crossing point quicker so it results in a more concentrated rush hour. But this doesn't take into account the A2 bottleneck at Kidbrooke or other constraints on the network. To claim "the scheme will enable more motorists to travel at the times they wish" is nonsense if the tunnel results in wider congestion across the area, as seems likely.

6.7. Inviting us to judge traffic levels with a completed tunnel in 2021 (figure 7-2) seems unrealistic when TfL has been predicting a completion date of 2022/23 for some time now. Furthermore, even if we substitute "year the tunnel opens" for 2021, TfL should be providing us with traffic modelling for five and 10 years after opening, so we can fully judge its effects.

6.8. We find the reduction of 440 PCUs at Blackwall/Silvertown in the inter-peak hard to believe when the Silvertown Tunnel offers no relief for the southbound A12, and would question whether the road network around the Rotherhithe Tunnel could cope with the increases predicted, which strike us as being very modest. In general, the oddly low increases for Blackwall/Silvertown crossings are contradicted in particular by figure 7-15, showing large increases in traffic coming off the North Circular Road at Beckton, an increase which continues south along the already-congested A102 beyond the point where the A2 meets the A205 at Westthorne Avenue.

#### The effects of encouraging HGVs

6.9. Encouraging more HGVs to use the A13 East India Dock Road - as TfL intends to do by aiming the Silvertown Tunnel at juggernauts - is particularly dangerous. There are also safety issues, as the East India Dock Road/Leamouth Road junction sees a high number of collisions.

6.10. We question whether the Silvertown Tunnel would in fact reduce the number of overheight vehicles at Blackwall Tunnel. Drivers of heavy lorries who are aiming to reach the A12 will still prefer to use the Blackwall Tunnel as it will remain the most direct route. Sending all HGVs via Silvertown, which is mentioned as a possibility, would overwhelm the road network on the north side of the Thames and lead to yet more pollution at the A13/A12 junction. To say further work is needed on "routeing strategies" is unacceptable.

6.11. Furthermore, the number of traffic lights between Tidal Basin Roundabout and the A13/A12 junction will make the Silvertown Tunnel a difficult diversion route when the Blackwall Tunnel is closed. An incident at the Silvertown Tunnel will see HGVs facing lengthy diversions via Dartford, and double-decker buses needing to use Tower Bridge (or having their journeys curtailed).

### The consequences for the rest of the road network

6.12. The PTA highlights capacity issues on the A206 Woolwich Road, A2 Rochester Way and A20 Sidcup Road, along with sections of the A13, A118 and A1205. There are also issues on roads close to the tunnel portals and beyond. By generating more traffic, Silvertown Tunnel can only exacerbate the problems caused by this lack of capacity.

6.13. While TfL admits to only “modest” increases in delays on the A2, it is important to note that these modest delays do add up to create a longer delay. In addition, the lack of acknowledgement of delays on the A206 is worrying.

6.14. The enormous size of the area of influence - from the Essex border at Chigwell in the north to Orpington in the south - shows the huge potential for adverse consequences for the scheme. This is not some local, parochial issue.

6.15. It strikes us as odd that TfL would wish to increase average speeds on the South Circular Road when most of the road is entirely unsuited to high speed traffic - particularly through Woolwich and Catford - with limits of 30mph in most places that are governed by speed cameras. Queues on the South Circular are usually unrelated to incidents at the Blackwall Tunnel, as any look at St Mildred’s Road or the Catford one-way system would confirm.

6.16. We would also question why trips from Canary Wharf to Lewisham see an increase in journey time in the afternoon peak (paragraph 7.2.42) in a transport scheme which is meant to make access to employment easier. Worse still, figure 7-33 indicates that employment opportunities would be less accessible for drivers throughout large parts of Newham borough.

6.17. Even if the tunnel provides access to 200,000 extra jobs for drivers who live in Greenwich, Lewisham and Bexley boroughs, a scheme which is aimed at making it easier to drive merely offers the potential for an intolerable increase in traffic congestion throughout the area.

### Induced traffic and the A102

6.18. It is concerning that induced traffic is brushed aside with a brief study - which repeats misleading information about “dedicated bus lanes” in the tunnel (paragraph B.3.1). If a user charge is a “powerful demand management tool”, it is also one that risks overwhelming other roads in the vicinity. TfL admits the effects of a user charge are uncertain (B.4.5) but seems to be crossing its fingers and hoping it will work anyway. The consequences of getting it wrong mean this attitude is not acceptable.

6.19. While TfL is at great pains to emphasise the extra resilience an extra tunnel could provide, nothing is said about the resilience or otherwise of the A102, which this scheme depends on. The Woolwich Road and Blackwall Lane flyovers were judged in 2014 by TfL

engineers to be in a poor state<sup>4</sup>, and are just as vulnerable - perhaps even more so - to a structural failing or terrorist attack (possibilities which are specifically mentioned in the consultation documents).

#### Rotherhithe Tunnel and beyond - too little work done on impacts

6.20. It is striking that TfL does not consider the effect on the road network around Rotherhithe Tunnel when considering the scheme's impact on the crossing, nor does it consider mitigation around here and at Tower Bridge. It is also odd that TfL appears to rule out charging Rotherhithe Tunnel and Tower Bridge for their effect on adjacent crossings when the next one along, London Bridge, is inside the congestion charge zone.

6.21. If TfL is promising five years of traffic monitoring if the Silvertown Tunnel is constructed. Considering how little TfL appears to know about Blackwall Tunnel usage now, why isn't this monitoring happening already? If more crossings are planned, then five years will not be long enough to study the effects of this new phase of roadbuilding.

#### Borough-level statistics are not good enough

6.22. We note that the preliminary transport report highlights difficulties accessing the labour market by car in the Thamesmead and Erith areas (figures 4-39 and 4-40). It's unclear quite how building an additional road crossing at Blackwall is meant to solve that if the access issue is six miles further east. This simply highlights that further traffic congestion around the A102 and A206 would be inevitable if the Silvertown Tunnel was to go ahead.

6.23. We also note that trip figures are only recorded at borough level - these figures do not provide detailed enough evidence that a further road crossing at the Greenwich peninsula is needed. Further work needs to be done to pin down where these trips originate from and to find an appropriate solution.

**Cross-river bus services: The Silvertown Tunnel scheme would give us the opportunity to introduce new cross-river bus routes for east London. We have described an illustrative cross-river bus network for east London in the 'Preliminary Transport Assessment', which is available to download. If you have any comments on the introduction of new cross-river bus routes please let us know in the space below.**

7.1. The only thing stopping TfL from running more buses across the Thames at this point is TfL. If TfL were serious about improving cross-river connectivity for bus users, it would have introduced new services by now.

7.2. There are many locations north of the river that south Londoners cannot easily reach by bus - employment centres such as Canary Wharf and London City Airport to leisure destinations such as Victoria Park and Lee Valley Ice Centre. Meanwhile, east Londoners find it hard to reach historic Greenwich's visitor attractions by bus as well as town centres

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<sup>4</sup> Documents provided in response to TfL FOI request FOI-2131-1415, as footnote 1.

such as Eltham and Bromley. TfL does not need to spend £1bn on a new road to fix this - it could introduce new services through Blackwall Tunnel tomorrow if it were serious about boosting cross-river links. All the signs show that it isn't, and hasn't been for many years.

#### TfL's lack of interest in current cross-river bus links

7.3. Since 1968, TfL and its predecessors have chosen to only operate one service through the Blackwall Tunnel, the 108, which currently runs from Lewisham to Stratford. Its usefulness as a cross-river link has been significantly weakened since 1998, when the route was diverted to serve North Greenwich station. The current main 108 service is overcrowded and struggles with demand, and TfL has barely responded to demands for extra buses.

7.4. A passenger petition for a more frequent service<sup>5</sup> resulted in only a single extra departure slotted into to the morning rush hour in 2014<sup>6</sup>. The only significant recent improvements to the service have focused on boosting capacity south of the river on O2 event nights, when additional double-decker buses run in one direction from North Greenwich to Lewisham only.

7.5. Furthermore, we note that TfL abandoned the only route through the Rotherhithe Tunnel, the 395, in 2006. Against this background, TfL's claims about using the Silvertown Tunnel to run new bus services must be taken with a pinch of salt.

#### This scheme fails to meet local political demands

7.6. We believe TfL is talking up bus services in an attempt to pacify local politicians - particularly the leadership of Greenwich Council and the MP for Eltham<sup>7</sup> - who have demanded the Docklands Light Railway runs through the tunnel. Indeed, it appears TfL is trying to tie long-demanded bus improvements - such as a bus from Kidbrooke Village to North Greenwich - to approval of the Silvertown Tunnel.

7.7. TfL's proposals fall far short of the demands made by local politicians, in particular those made in Greenwich Council's 2014 consultation response<sup>8</sup>. Table F-1 in the Preliminary Transport Assessment shows that there would be a only be a small improvement in cross-river public transport capacity. Buses would not even get their own lane in the tunnel - despite misleading comments from TfL, even in these consultation documents. They would have to share a lane with HGVs, rendering them liable to delays.

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<sup>5</sup> <https://www.change.org/p/increase-capacity-on-the-108-bus-route>

<sup>6</sup> *News Shopper*, 24 July 2014  
[http://www.newsshopper.co.uk/news/11364879.TfL\\_to\\_add\\_extra\\_service\\_to\\_ease\\_chaos\\_on\\_108\\_bus\\_to\\_Greenwich/](http://www.newsshopper.co.uk/news/11364879.TfL_to_add_extra_service_to_ease_chaos_on_108_bus_to_Greenwich/)

<sup>7</sup> *News Shopper*, 28 January 2010  
[http://www.newsshopper.co.uk/news/4875389.ELTHAM\\_MP\\_demands\\_new\\_DLR\\_station/](http://www.newsshopper.co.uk/news/4875389.ELTHAM_MP_demands_new_DLR_station/)

<sup>8</sup> <http://committees.royalgreenwich.gov.uk/ieDecisionDetails.aspx?ID=3012>

### The indicative network does not even meet current needs

7.8. The “indicative new network” does little to address capacity problems on the existing 108 corridor (particularly between Blackheath Village and Westcombe Park) - the Grove Park to Canary Wharf service takes a diversion via Charlton, for example.

7.9. 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.

7.10. 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?

7.11. TfL claims route 108 would see a 25% increase in patronage if the Silvertown Tunnel were built because the route would have fewer delays. But this 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.

7.12. Indeed, with two services from East London - the 104a and 309 - set to run no further south than North Greenwich, it appears TfL's bus planners share our fears about the effects of the Silvertown Tunnel on south-east London's wider road network.

### Cross-river public transport links remain inadequate

7.13. TfL's comments about public transport improvements - namely the Jubilee Line extension - not having led to a decrease in Blackwall Tunnel usage strike us as odd to say the least. In particular, the wider SE London area lacks the orbital transport corridors needed to be truly competitive with the car. The DLR only runs as far as Lewisham and Woolwich, requiring often indirect bus journeys or unattractive National Rail trips to head further south. Indeed, paragraph F.3.12 concedes that public transport to the east of London is still inferior to that in the west.

7.14. Even 16 years after it opened, North Greenwich station is still relatively remote from surrounding communities - with the vast majority of users having to take a bus there. Most journeys from North Greenwich head west towards Canary Wharf and central London, rather than north to Stratford. Given the multiple changes required for journeys to north-east and east London, it is hardly surprising that the car would remain the preferred option for these trips. (An example - Charlton Station to Clapton Pond is 22 minutes by car, at least an hour by public transport.) The same applies in reverse - a trip to a location such as Eltham remains much easier by car from north of the Thames.

7.15. We would also note that the peak flows through the northbound tunnel - between 0600 and 0700 - take place when the 108 is running at a reduced frequency of four buses per hour. A better bus service through the tunnel at this time could aid modal shift and free up road space for vehicles that need to use the tunnel.

**Any other comments: Do you have any comments on any other issue connected to the Silvertown Tunnel scheme. If so, please let us know in the space below.**

8.1. We have drawn upon the Preliminary Business Case, the Preliminary Distributional Impacts Appraisal, the Preliminary Economic Assessment, the Preliminary Health Impact Assessment and the Preliminary Regeneration and Development Impact Assessment for many of the observations in this section.

8.2. Generally, it seems inappropriate that this is the final public consultation when so many of the assessments of the scheme's strengths and weaknesses are only at a preliminary stage.

#### Private Finance Initiative

8.3. The introductory web page for the consultation quotes the cost of the scheme as £1bn, but the preliminary outline business case quotes an estimated final cost of £792m - what accounts for this discrepancy? The cost of financing the contracts is not included in the business or economic cases: does this account for the difference?

8.4. TfL must ensure sufficient users pay the user charge to allow payment of the PFI contract. Thus it seems that TfL is expected to simultaneously encourage and discourage use of the tunnel. It hardly seems likely that TfL will work towards a net reduction of drivers using the crossing when it is reliant on the user charge revenue to pay the cost of tunnel construction.

8.5. PFI is likely to be more expensive to TfL than raising money either by bonds or from the Treasury. It also means the opportunity cost represented by spending money on building the Silvertown Tunnel rather than public transport is even greater.

8.6. Opting for a PFI scheme also suggests that TfL cannot pay for this project out of its regular budget. The long term (30-year) contractual commitment to pay an external company to operate and maintain the tunnel is likely to have an impact on other parts of TfL's budget, taking up vital funds that could be spent on the public transport network.

8.7. At the time of writing, it is widely reported TfL is soon to lose £700m of Government funding<sup>9</sup>. At the Surface Transport Panel meeting of 22 October 2015, TfL's managing director of surface transport, Leon Daniels, acknowledged that TfL would soon face a steep

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<sup>9</sup> *Financial Times*, 12 November 2015:  
<http://www.ft.com/cms/s/0/b7392524-8923-11e5-90de-f44762bf9896.html>

loss of funding - and commented that funding the Silvertown Tunnel would be a considerable challenge.

### Resilience

8.8. The business case states that one of the problems to be solved by building the Silvertown Tunnel is that the northbound Blackwall Tunnel is built to outdated design standards and unsuitable for many of the types of vehicle that attempt to use it. TfL's intention is to increase the resilience of the local transport network. However, the scheme proposes that this outdated tunnel will remain in use for motor traffic. It seems likely that resilience will not be greatly improved if the flaws of a tunnel built for horse traffic still cause delays and congestion.

8.9. This situation may be worsened as drivers attempt to move between approaches to blocked and unblocked tunnels and a greater volume of traffic is forced via the Silvertown Tunnel onto the road network in east London.

### Project management

8.10. Can TfL explain its process for cost management? We note that a risk figure is included in the current scheme budget - does this risk figure represent all tolerance for cost increases? If costs increase beyond this figure as the details of construction become apparent, will the project's sponsors cancel the scheme?

8.11. The economic assessment correctly does not include sunk cost in its calculation of benefit. However, sunk cost is still important information for local decision-makers as an indicator of the health of the scheme: does TfL have a comparison of cost-to-date against forecast costs for this stage of the project?

### Modelling and risk

8.12. There is no way for the lay reader to assess the confidence with which predictions under the assessed case are made. This means assessing whether the risks presented by the scheme are acceptable is impossible.

8.13. All the preliminary assessments to date are on the basis of the assessed case - this means that risks to the case are not visible to those who should consent to the scheme, and that adverse externalities are not sufficiently included in possible impacts. Does TfL have a list of risks to the scheme (including both risks to the project and risks to the project's benefit case) with the likelihood of the risk coming to pass and the impact if it does? For example, assessment of both noise and air quality impacts are entirely dependent on traffic volumes being the same as the assessed case.

8.14. The assessment areas differ widely across the different areas being considered: while the traffic and congestion impacts are considered over a comparatively wide area, the public transport impacts are considered over a smaller area and the environmental impacts

considered over a smaller area again. This means that comparison across different considerations is made more difficult.

8.15. TfL uses a number of models throughout the consultation documents to forecast the likely outcomes of the scheme. But it is unclear how far the models used have been tested against real-world outcomes. Has TfL compared the models used and their forecasts for traffic volumes in the current road configuration against actual traffic volumes and flows? Does TfL intend to make this comparison in the time available between now and the start of construction to provide further evidence of the strength of its predictions?

#### Public transport

8.16. The business case argues that significant investment in public transport in east and south east London has left the highway network behind. However, any examination of available public transport in south east London in particular would show that the density of available public transport connections is not comparable to areas an equivalent distance from central London in west London. Investment to date has improved the situation in east and south east London but more is still needed to support the growth of the area, and the £1 billion to be spent on this scheme represents money that will not be spent on public transport.

8.17. The Health Impact Assessment shows that building highways connectivity does not benefit the poorest quintile of the population who are largely dependent on public transport. Spending on public transport rather than this scheme would more equitably distribute the opportunities brought about by regeneration.

#### Air quality modelling

8.18. Defra modelling assumes that diesel cars will meet EU emissions standards. This assumption has recently been shown to be unsafe following the discovery that both nitrogen dioxide and carbon dioxide emissions ratings for Volkswagen cars were obtained fraudulently. That Defra models have been shown to be optimistic over time is acknowledged and discussed in section 6.3 of the PEIR, and yet there is no evidence that the model chosen will sufficiently counter this bias - merely that it is roughly as optimistic/pessimistic as a London-based model.

8.19. Our own surveys of local air quality suggests that nitrogen dioxide is present at unsafe levels in the areas of east and south east London we studied. Even a modest increase in traffic volumes would mean that air quality worsens.

#### Economic case

8.20. Transport connectivity is a necessary but not a sufficient condition for development: does the economic benefit given in the analysis under 'wider impact' only include the proportion of, for example, agglomeration benefits that is made possible by new roads?

8.21. The business case argues both that new roads are needed to support new development in east London and also that new development will only be made possible if new roads are built. It seems more likely that the growth of east and south-east London will continue whether the tunnel is built or not. Developer Knight Dragon, when applying to Greenwich Council for its recent Greenwich Peninsula masterplan, told planners the Silvertown Tunnel was not needed for development to go ahead<sup>10</sup>.

8.22. In addition, the business case argues that even though car use as a share of trips is declining, the increase in population will mean that there will be a small absolute rise in trips by car, while elsewhere acknowledging that the phenomenon of induced traffic means that building roads is likely to lead to an increase in traffic volumes. While TfL intends to mitigate the amount of traffic induced by imposing a user charge, there would be less risk of increasing the amount of car trips in London if additional road capacity is not added.

8.23. The likelihood of the economic benefits suggested coming to pass is hard to assess as all scheme documentation only presents the best outcome of the scheme. This means the risk of negative externalities if the scheme does not perform to forecast is not covered in the scheme documentation. In particular, costs associated with ill-health associated with higher levels of air pollution - economic impact both through loss of productive time from early death or illness and through health care costs - are not presented as a risk to the scheme. Costs associated with regulatory fines for poor air quality are also not covered in the scheme documents.

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<sup>10</sup> Greenwich Council planning reference 15/0716/O - Part 1 Transport Assessment, paragraph 7.10.4: "The Masterplan proposals are not reliant on the presence of the tunnel."  
[http://publicaccess.royalgreenwich.gov.uk/online-applications/files/A9EC14B6776F4F497C096524165D6C2F/pdf/15\\_0716\\_O-PART\\_1\\_TRANSPORT\\_ASSESSMENT-288659.pdf](http://publicaccess.royalgreenwich.gov.uk/online-applications/files/A9EC14B6776F4F497C096524165D6C2F/pdf/15_0716_O-PART_1_TRANSPORT_ASSESSMENT-288659.pdf)