

No to Silvertown Tunnel briefing, August 2015

www.silvertowntunnel.co.uk

These are the main objections to the Silvertown Tunnel. Our concern is that many politicians simply haven't looked at the detail of the proposal. They're so deafened by the mantra of "more river crossings" that they are sleepwalking into a dangerous project that will have consequences across east and south east London.

It appears that Transport for London is rushing this proposal through so it can be rubber-stamped by Boris Johnson before he leaves office. Justifications for building it keep changing. It was once sold as an economic boost to the area - now it's being sold as a relief road for HGVs that can't fit through the 1897 northbound tunnel¹.

A final consultation is due in September, with a planning application set to go to the UK Government in spring 2016. A decision isn't expected until the end of 2017 - so there's plenty of room for an incoming mayor to cancel the project.

The Silvertown Tunnel doesn't have the widespread support its promoters claim. Hackney, Lewisham and Southwark Councils oppose it. Hackney even passed a motion against it in July².

Greenwich & Woolwich MP Matt Pennycook has serious doubts about the proposal³. Major landowners in the Royal Docks - Quintain and ExCeL - also have big doubts. Southern Gas Networks, which owns what's left of the old East Greenwich Gas Works, is adamantly opposed to the scheme, citing concerns about contaminated land⁴. As you'd expect, Green London Assembly members oppose it, but so do Liberal Democrats.

1. The Silvertown Tunnel will increase traffic in the area, and TfL's policy on tolling is in chaos. As recently as the autumn 2014 consultation⁵, TfL has stated that it expects more traffic to use the combined Blackwall/Silvertown crossings if the Silvertown Tunnel is built. It's also said tolls will be comparable to those at Dartford - which is already at capacity. We understand it's starting to tell councillors that the tolls will be set

¹ TfL presentation to East Greenwich Residents Association, 19 May 2015:
<http://www.egra.london/#!/silvertown-tunnel/c16mn>

² Hackney, Lewisham and Southwark responses to 2014 consultation, plus last week's motion:
<http://www.silvertowntunnel.co.uk/2015/07/23/hackney-council-declares-its-opposition-to-the-silvertown-tunnel/>

³ Matt Pennycook, Greenwich.co.uk, November 2014:
<http://blogs.greenwich.co.uk/matt-pennycook/the-case-for-the-silvertown-tunnel-has-still-not-been-made-convincingly/>

⁴ Taken from these companies' submissions to the 2014 Silvertown Tunnel consultation.

⁵ Figures 7-5 and 7-7 here:
<https://tfl.gov.uk/cdn/static/cms/documents/st-silvertown-tunnel-transport-assessment.pdf>

at a level that will prevent any increase in traffic - contradicting their own consultation materials - but there's no evidence of any research being carried out to test this.

2. The Silvertown Tunnel will exacerbate bottlenecks elsewhere on London's road network, and create new ones. Encouraging new traffic to use the A102 will worsen southbound queues through the Sun-in-the-Sands roundabout and out through Eltham on the A2. North of the river, it will do nothing to ease traffic on the A12 south through Tower Hamlets, but it will exacerbate queues on the Lower Lea Crossing - which already struggles with traffic to ExCeL - and Aspen Way, as it will make travel to and from Canary Wharf more straightforward for commuters from Kent and Essex. Current plans to end the tunnel at a roundabout risk queues running through the tunnel and back into south London. Meanwhile, tolls at Blackwall/Silvertown are likely to result in more traffic using Rotherhithe Tunnel, with knock-on effects in Deptford, New Cross, historic Greenwich town centre, Lewisham and Brockley. A report commissioned by Greenwich Council, but never formally published, says the tunnel will overwhelm local roads⁶.

3. The Silvertown Tunnel will encourage more HGVs onto London's roads. TfL has recently started to claim the tunnel's main aim is to provide a diversionary route for lorries that can't fit into the 1897 Blackwall Tunnel. Yet we should not be encouraging HGVs to enter inner London in the first place - that is what the Dartford crossing is for. TfL openly admits that many lorry drivers, especially those from abroad, would rather chance it through Blackwall than use the M25. Since many HGVs will simply be aiming to head north on the A12, it is unclear quite why TfL thinks such drivers would change their behaviour and use the Silvertown Tunnel instead. This new HGV traffic would face a contorted route upon leaving the tunnel, adding to local traffic at Leamouth Road and East India Dock Road before reaching the A12. TfL should be doing more to stop overheight HGVs from getting anywhere near the tunnel in the first place - such as monitoring heights of lorries before they reach Woolwich Road flyover, allowing them to take the M25/ Dartford Crossing instead.

4. The Silvertown Tunnel will add pressure onto a single pinch-point - the A102 through Greenwich. TfL claims the tunnel will "increase resilience" at Blackwall - but it will simply make its southern approach even more vulnerable to congestion. The current road faces 100 closures per year due to breakdowns, accidents and other incidents⁷. Its flyovers at Blackwall Lane and Woolwich Road, built in 1969, are in a "poor" condition, according to TfL maintenance reports⁸. Accepting the Silvertown Tunnel on trust that other crossings will miraculously appear later - particularly the hotly-disputed bridge at Gallions - is irresponsible, to say the least.

⁶ Hyder Consulting report into Eltham DLR proposal, May 2012
https://853blog.files.wordpress.com/2014/04/eltham_dlr002.pdf

⁷ Taken from FOI request to TfL:
https://www.whatdotheyknow.com/request/east_south_east_london_road_clos#incoming-567248

⁸ BBC London News, December 2012: <http://www.bbc.co.uk/news/uk-england-london-20533457> We have the most recent reports, obtained via FOI, and the conditions are still "poor".

5. The Silvertown Tunnel will worsen air quality - TfL admits this. We often hear London-wide politicians say they want to improve London's air quality - perhaps when talking about Heathrow. But they go silent when it comes to the Silvertown Tunnel, a plan which TfL admits will lead to increased pollution where congestion worsens⁹. Who in Greenwich, Tower Hamlets, Newham or Lewisham will vote for a mayoral candidate who wants to erode the quality of their lives and their children's lives? Some local representatives still cling to the belief that "free-flowing" traffic will magically get rid of pollution, even if there is more of it¹⁰ - there is no evidence to prove this.

6. TfL is not properly considering public transport or cycling/walking alternatives. TfL's view is that, effectively, there already have been enough "new" public transport crossings across the Thames - these include the East London Line (opened 1869), the Emirates Air Line and HS1 (which charges premium fares and is of very limited use). Yet even with Crossrail, there will remain no public transport crossings east of Woolwich. Public transport has played a key role in regeneration, from Canary Wharf to the benefits of the London Overground. Furthermore, TfL is only now belatedly investigating the possibility of a Rotherhithe-Canary Wharf walking/cycling bridge. While welcome, this links areas that are already well-developed. We have called for a walking/cycling link from the Greenwich Peninsula to Canary Wharf (a bridge was costed by TfL at £100m in 2011)¹¹ and for the urgent expansion of the London Overground from Barking Riverside to Thamesmead and Abbey Wood¹², areas from which many Blackwall Tunnel users start their journeys.

7. The cost is spiralling. In 2012, the tunnel was costed at £600m¹³. In 2014, it was £750m¹⁴. Earlier this year, KPMG announced to City traders that the PFI project was worth £1bn¹⁵. With possible decontamination costs, what will the final bill be? And how long will it take to pay the final debt off - is this toxic tunnel really worth the cost?

⁹ page 9, Responses to issues raised in autumn 2014 consultation
https://consultations.tfl.gov.uk/rivercrossings/silvertown-consultation/user_uploads/silvertown-responses-to-issues-raised-report.pdf-1

¹⁰ Greenwich councillor Harry Singh, question 36, January 2013 council meeting:
<http://committees.greenwich.gov.uk/documents/s25825/Minutes%20Appendix%20A%20-%20Public%20Questions.pdf>

¹¹ 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/>

¹² No to Silvertown Tunnel petition
<https://www.change.org/p/boris-johnson-rt-hon-patrick-mcloughlin-mp-transport-for-london-extend-london-overground-from-barking-riverside-to-thamesmead-and-abbey-wood>

¹³ BBC London, October 2012 <http://www.bbc.co.uk/news/uk-england-london-20140560>

¹⁴ BBC London, October 2014 <http://www.bbc.co.uk/news/uk-england-london-29610463>

¹⁵ Announced on Thomson Reuters newswire, 20 April 2015