

## **No to Silvertown Tunnel - submission to London Assembly Transport Committee congestion investigation, September 2016**

The Silvertown Tunnel is a planned road tunnel that would run under the River Thames between the Greenwich Peninsula and the Royal Docks. No to Silvertown Tunnel is a campaign set up by local residents to oppose the scheme.

We believe the Silvertown Tunnel, if built, will fail in its objective to relieve congestion, and lead to worse jams and worse pollution in both east and south-east London.

This response aims to answer questions 14, 15 and 16. We would be happy to address the committee about the issues raised. You can find out more about the issues surrounding the Silvertown Tunnel, and our campaign, at [www.silvertowntunnel.co.uk](http://www.silvertowntunnel.co.uk).

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### **Can new road infrastructure help reduce traffic congestion?**

1. It is well-known that road-building generates more traffic. This is borne out by evidence reviewed for the UK Department for Transport by the Standing Advisory Committee on Trunk Road Assessment (SACTRA)<sup>1</sup> in 1994 and further evidence reviewed by the University of Toronto<sup>2</sup> in 2011. Many more studies attest to the evidence.

2. Attempting to fix congestion by building new road infrastructure is, therefore, counterproductive. At the Silvertown Tunnel, even with tolls, Transport for London envisages increases in traffic heading southbound in the evening peak, into the already congested A102/A2. Tolling also risks sending further traffic to the nearest free crossing at Rotherhithe, resulting in increased congestion in Greenwich, Deptford, Poplar and Limehouse.

3. The surrounding road network simply cannot cope with even a small increase in traffic. TfL admits to capacity issues on routes on both sides of the river.<sup>3</sup> Any short-term gain from temporarily unblocking the northbound Blackwall Tunnel bottleneck would be wiped out by increased congestion on the A1020 Lower Lea Crossing (which already struggles to cope with

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<sup>1</sup> *Trunk Roads and the Generation of Traffic*, 1994

<http://webarchive.nationalarchives.gov.uk/+/http://www.dft.gov.uk/pgr/economics/rdg/nataarchivedocs/trunkroadstraffic.pdf>

<sup>2</sup> *The Fundamental Law of Road Congestion. Evidence From US Cities.*

<http://www.environment.utoronto.ca/News/RoadExpansionStudy.aspx>

<sup>3</sup> Silvertown Tunnel Preliminary Transport Report, paragraph 4.2.32

<http://content.tfl.gov.uk/preliminary-transport-assessment-chapters-01-to-08.pdf>

ExCeL exhibition traffic<sup>4</sup>) and A102/A2 southbound through Kidbrooke and Eltham, which is already beset by daily southbound queues<sup>5</sup>. In effect, the Silvertown Tunnel would displace traffic congestion from one spot to elsewhere, rather than relieving it.

4. Even former mayor Boris Johnson, who was a strong advocate for the scheme, admitted the Silvertown Tunnel will put more pressure on the road network<sup>6</sup>. Greenwich Council's consultants have also warned that the proposals as they stand, which contain no accommodation for public transport, pedestrians or cyclists, will overwhelm local roads<sup>7</sup>.

### **The Silvertown Tunnel and air quality**

5. We have conducted three "citizen science" air pollution studies, which show the already-frightening levels of air pollution in areas close to the Blackwall Tunnel approaches.

6. One reading showed nitrogen dioxide levels of 104 microgrammes per cubic metre by the A102 at Bramshot Avenue, Charlton<sup>8</sup>, on a route used by children heading to primary and secondary schools in the area. This road is expected to have to cope with extra traffic if the Silvertown Tunnel is built.

7. Tunnel supporters like to compare the east side of London with west London, where there are far more road crossings, claiming a new crossing at Blackwall will relieve air pollution issues<sup>9,10</sup>. This simply is not the case. These bridges are jammed with traffic on a daily basis in rush hour

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<sup>4</sup> Local resident's video: <https://www.youtube.com/watch?v=6gUe3NYsYII>

<sup>5</sup> No to Silvertown Tunnel video: <http://www.silvertowntunnel.co.uk/2014/10/22/video-tfls-silvertown-tunnel-wont-cure-blackwall-tunnel-congestion/>

<sup>6</sup> *Ask Boris*, LBC, 1 April 2014 <http://www.lbc.co.uk/ask-boris-1st-april---watch-in-full-89825>  
Transcribed by the Boris Watch blog  
<http://www.boriswatch.co.uk/2014/04/02/more-lbc-transcripts-east-london-river-crossings/>

<sup>7</sup> Eltham DLR extension feasibility study, Hyder Consulting, obtained via Freedom of Information Act  
[http://853blog.files.wordpress.com/2014/04/eltham\\_dlr002.pdf](http://853blog.files.wordpress.com/2014/04/eltham_dlr002.pdf)  
[https://www.whatdotheyknow.com/request/silvertown\\_falconwood\\_hyder\\_cons](https://www.whatdotheyknow.com/request/silvertown_falconwood_hyder_cons)

<sup>8</sup> No to Silvertown Tunnel 2014 air pollution study  
<http://www.silvertowntunnel.co.uk/our-study/2014-silvertown-tunnel-pollution-study-results/>

<sup>9</sup> Newham councillor Conor McAuley quoted in the Newham Recorder, 26 January 2013  
[http://www.newhamrecorder.co.uk/news/big\\_debate\\_newham\\_councillor\\_and\\_tower\\_hamlets\\_resident\\_argue\\_for\\_and\\_against\\_more\\_river\\_crossings\\_1\\_1829083](http://www.newhamrecorder.co.uk/news/big_debate_newham_councillor_and_tower_hamlets_resident_argue_for_and_against_more_river_crossings_1_1829083)

<sup>10</sup> Greenwich councillor Harry Singh, question 36, full council meeting 30 January 2013  
<http://committees.greenwich.gov.uk/documents/s25825/Minutes%20Appendix%20A%20-%20Public%20Questions.pdf>

and residents in Putney<sup>11</sup> and Battersea<sup>12</sup> complain of high pollution levels. In 2015, Putney High Street exceeded its yearly legal limit of nitrogen dioxide levels in a week<sup>13</sup>. It has since been declared a “green bus corridor”<sup>14</sup>. More crossings do not equal less pollution.

### **The Silvertown Tunnel is no solution to traffic congestion**

8. We're fully aware there is a problem with traffic at the Blackwall Tunnel. We know because we live here. But building a third tunnel there is no solution. It will exacerbate other bottlenecks. And we regret that local politicians in Greenwich, Newham and Tower Hamlets are falling into line with discredited and outdated schemes such as the Silvertown Tunnel. Indeed, in Greenwich's case, it actively promoted it in its council newspaper and on street stalls<sup>15</sup> - rather than backing sustainable schemes for our capital's future needs. We are grateful that other boroughs - particularly Lewisham<sup>16</sup> and Hackney<sup>17</sup> - have properly scrutinised the scheme, and found it wanting.

9. We also doubt that a new crossing between Greenwich Peninsula and the Royal Docks will act as an economic boost. In London, it has been public transport investment that has brought investment into areas. Canary Wharf only really began to take off after the Jubilee Line opened in 1999, while areas such as Brockley and Shoreditch have been boosted by the new London Overground service. In the Royal Docks, development is already taking place on the Royal Wharf and City Island developments without the addition of a new road tunnel, while development is accelerating at Greenwich Peninsula.

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<sup>11</sup> Putney Society <http://www.putneysociety.org.uk/news-and-issues/air-pollution-in-putney.html>

<sup>12</sup> *Wandsworth Guardian*, 4 February 2014  
[http://www.wandsworthguardian.co.uk/news/10983607.Groups\\_join\\_forces\\_to\\_tackle\\_high\\_levels\\_of\\_air\\_pollution\\_in\\_Battersea/](http://www.wandsworthguardian.co.uk/news/10983607.Groups_join_forces_to_tackle_high_levels_of_air_pollution_in_Battersea/)

<sup>13</sup> *CityMetric*, 7 January 2015  
<http://www.citymetric.com/horizons/some-london-streets-have-already-hit-their-pollution-limits-entire-year-618>

<sup>14</sup> Wandsworth Council press release, 9 August 2016  
[http://www.wandsworth.gov.uk/news/article/13467/putney\\_to\\_be\\_london\\_s\\_first\\_low\\_emission\\_bus\\_zones](http://www.wandsworth.gov.uk/news/article/13467/putney_to_be_london_s_first_low_emission_bus_zones)

<sup>15</sup> *Greenwich Time*, 4/11/18 December 2012, 8/15/22/29 January 2013  
<http://www.royalgreenwich.gov.uk/greenwichtime>

<sup>16</sup> Lewisham Council representation to Silvertown Tunnel planning process  
<https://infrastructure.planninginspectorate.gov.uk/projects/london/silvertown-tunnel/?ipcsection=relreps&relrep=25261>

<sup>17</sup> Hackney Council representation to Silvertown Tunnel planning process  
<https://infrastructure.planninginspectorate.gov.uk/projects/london/silvertown-tunnel/?ipcsection=relreps&relrep=25346>

## **Tolling the Silvertown Tunnel shows it will not work**

10. TfL's need to toll the Silvertown Tunnel and the Blackwall Tunnel shows how unworkable this scheme is. It is unlikely that the low toll charges - just £1 for a car in off-peak hours, with some journeys charged at £3 in peak hours<sup>18</sup> - will prevent a huge increase in traffic using this corridor. There is no incentive to use public transport where it is available. A bus journey (£1.50) is more expensive for a single traveller at off-peak hours, while the Emirates Air Line (£3.50) will always be more expensive<sup>19</sup>. Conversely, higher tolls would compel drivers to use the nearest free crossings at Rotherhithe Tunnel and Tower Bridge, exacerbating congestion elsewhere, including the Maritime Greenwich World Heritage Site.

11. If TfL genuinely believed that tolling a single section of the network would reduce unnecessary demand, it could apply the charges to the Blackwall Tunnel tomorrow - saving the expense and bother of spending £1 billion on a new road. However, it refuses to do so<sup>20</sup>.

12. TfL's own traffic forecasts show the Silvertown Tunnel would increase northbound traffic flows in the morning peak by 37%<sup>21</sup>. Even if the perennial queues at the Blackwall Tunnel entrance clear, it is not clear how the local road network in Poplar, Silvertown and Canning Town is meant to absorb this influx of extra traffic, which will include HGVs currently prohibited by the restrictive nature of the northbound Blackwall Tunnel.

13. Furthermore, southbound flows in the afternoon peak are due to increase by 35%<sup>22</sup> - but most of these drivers are simply doomed to join the existing queues on the A102 and A2 through Sun-in-the-Sands and Kidbrooke, increasing congestion and pollution on this corridor and adding to costs for businesses who depend on a reliable road network.

## **What infrastructure is needed to cut congestion?**

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<sup>18</sup> Silvertown Tunnel Preliminary Charging Report  
<http://content.tfl.gov.uk/preliminary-charging-report.pdf>

<sup>19</sup> No to Silvertown Tunnel response to 2015 TfL consultation, section 4.16  
[http://www.silvertowntunnel.co.uk/wp-content/uploads/2015/11/NtST\\_2015\\_consultation\\_response\\_with\\_foontnotes.pdf](http://www.silvertowntunnel.co.uk/wp-content/uploads/2015/11/NtST_2015_consultation_response_with_foontnotes.pdf)

<sup>20</sup> Mayor's Question Time, answer from Boris Johnson to Caroline Pidgeon AM, 19 November 2014  
[http://questions.london.gov.uk/QuestionSearch/searchclient/questions/question\\_278496](http://questions.london.gov.uk/QuestionSearch/searchclient/questions/question_278496)

<sup>21</sup> Silvertown Tunnel Traffic Forecasting Report, figure 4-1  
<http://content.tfl.gov.uk/st-silvertown-traffic-forecasting-report.pdf>

<sup>22</sup> Silvertown Tunnel Traffic Forecasting Report, figure 4-2  
<http://content.tfl.gov.uk/st-silvertown-traffic-forecasting-report.pdf>

13. Any solution to the problem of cross-river congestion should be looked at in the context of cutting congestion levels across east and south-east London as a whole - such as dropping tolls at Dartford, to keep unnecessary traffic off the A2, A102 and A12. Traffic from outside London - say, Maidstone to Enfield - shouldn't be using inner London to get there in the first place - yet the current tolling regime at Dartford incentivises them to do so.

14. Road pricing across London - rather than at specific points - should be considered to get traffic levels down to sustainable numbers. The technology already exists to do this. Otherwise, building new roads will simply overwhelm east and south east London with congestion.

15. People in east and south-east London also need to have the public transport alternatives that west Londoners enjoy. We would like to see better public transport connections across the Thames, such as extending the London Overground from Barking to Thamesmead and Abbey Wood, and pedestrian and cycle connections from Canary Wharf to both North Greenwich and Rotherhithe. The emphasis should be on making connections like these, not on urban road-building.