

Response to Transport for London (TfL) statutory consultation on the proposed Silvertown Tunnel (2015) from the Royal Borough of Greenwich Conservative Council Group

November 2015

1. Executive summary

- 1.1. The Greenwich Conservative Council Group welcomes this opportunity to comment on more detailed proposals for the Silvertown Tunnel.
- 1.2. **We remain supportive in principle of the Tunnel**, which we believe will bring significant economic benefits to Greenwich and London as a whole, and will provide a much-needed improvement to the resilience of our local transport network. **Despite this, we have significant concerns over several aspects of the current proposals** – including on the environmental impact, air and noise pollution, insufficient changes to the existing road network and plans that would see local residents included in tolling arrangements.
- 1.3. In addition to these concerns, we remain of the view that the current proposals represent **a missed opportunity for a significantly more ambitious radical solution that would include bringing a new DLR extension to Eltham**. We believe a DLR extension would take a significant amount of traffic off the road network, strengthening the case for the Tunnel as a means of improving resilience and reducing congestion, and would be transformative for the South East London economy. Our area of London is suffering from decades of under-investment in transport infrastructure because bold decisions were not taken in the past – and we fear that not including the DLR extension is a further example of this.
- 1.4. From these proposals and our previous interactions with TfL, and with the leadership of the Royal Borough of Greenwich, **we do not believe that sufficiently serious consideration has been given to the DLR option**. We believe this is in part because Greenwich Council has failed to make the case for the DLR extension to TfL, including its deeply regrettable decision not to even submit its own externally-commissioned Hyder Consulting study for consideration in 2011.

- 1.5. **We strongly recommend that Transport for London halts its current timetable and gives formal consideration to the DLR option**, with an alternative proposal then put to public consultation.
- 1.6. We do not believe this should be the final consultation on the scheme. Whether the scheme proceeds with or without formal consideration of the DLR option, then we believe the final – rather than preliminary – various reports, assessment and statements should be put to a final public consultation before plans are formally submitted, even though this would delay TfL’s timetable.
- 1.7. This further consultation is particularly important in ensuring improved public scrutiny of the environmental impact of the proposals, given that under the current consultation process, the final environmental information report will only become available after the last stage at which members of the public and stakeholders can submit their views. The environmental impact of the proposal remains the aspect causing most public concern, and we believe TfL must do more to address this point.
- 1.8. We believe that plans for the proposed mitigations for disruption caused by the construction of the Tunnel should also be put to separate consultation, as these are at too early a stage for the public and stakeholders to express an informed view.
- 1.9. In the response that follows, we have firstly answered the questions in line with the Consultation Questionnaire, with reference to the 11 Consultation Documents. We have also considered representations from our constituents, attended various public meetings and given consideration to other groups’ views and responses.
- 1.10. Any queries about this response should be directed to Cllr Matt Hartley, Leader of the Conservative Group (matt.hartley@royalgreenwich.gov.uk) or Cllr Matt Clare, Conservative Spokesperson for Transport (matt.clare@royalgreenwich.gov.uk)

2. Question (1) - 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?

- 2.1. We support the Silvertown Tunnel scheme in principle as a means of addressing congestion and closures at the Blackwall Tunnel and supporting future growth. Our starting point is that the status quo is clearly untenable, with significant problems at Blackwall not only inhibit economic activity but also causing significant damage to the environment and public health. The current proposals would represent a considerable improvement, with a more resilient transport network, less congestion and standing traffic.
- 2.2. The proposal makes a convincing case for the economic benefits of the Tunnel to Greenwich, opening up new markets north of the river, reducing overheads caused by the inadequacy of the current road network and stimulating job creation. We note in particular TfL's survey of employers, in which three quarters said that Blackwall Tunnel congestion is a constraint or disruption on their ability to trade and a fifth said they would employ additional staff if this was resolved.
- 2.3. However, we have significant concerns over several other aspects of the current proposals, including on environmental impact, air and noise pollution, insufficient changes to the existing road network and plans that would see local residents included in tolling arrangements. These are given throughout this response.
- 2.4. We also believe that the proposals represent a missed opportunity for a significantly more ambitious and radical solution that would also include bringing a new DLR extension to Eltham, along the proposed route developed by Hyder Consulting for Greenwich Council in 2011 (a study that was regrettably never submitted by Greenwich Council for formal consideration). This would be transformative for the South East London economy, and would rectify decades of under-investment in public transport infrastructure. Inclusion of a DLR extension would take a significant amount of traffic off the road network, strengthening the case for the Tunnel as a means of improving resilience and reducing congestion.
- 2.5. Given these concerns, we strongly recommend that TfL halts its current timetable and gives formal consideration to the DLR option, with an alternative proposal then put to public consultation.
- 2.6. Further details on the points above are given in our responses to subsequent questions.

3. Question (2) - 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.

- 3.1. We have significant concerns over this aspect of the proposals, which only include the junctions linking the tunnel to the existing road network – and do not include any changes to elements of the network further afield. On the south side, we are surprised to learn that TfL expects that no changes will be needed to junctions further south including the Sun In The Sands roundabout and the Kidbrooke Elbow, which currently see significant congestion.
- 3.2. While we accept that this existing congestion is largely due to the problems at the Blackwall Tunnel that this proposal will address, it seems unrealistic to expect that no changes will be required to these junctions given the fundamental change to road usage patterns that the Tunnel will bring. This is particularly true as TfL has stated that traffic impacts will be felt as far as Bromley.
- 3.3. If TfL is confident in its assessment that changes to junctions further north and south are not required, then the reasons for this assessment should be published and opened up to public and stakeholder scrutiny. If such changes have not been included because these consequences of the proposal have not been formally considered, then this should be rectified at the earliest opportunity.

4. Question (3) - 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.

- 4.1. We fully accept that such a significant construction project will entail significant disruption while construction is underway, but this must be done with public consent and after thorough, details consultation, particularly with residents who will be directly affected on the Peninsula.
- 4.2. We support TfL's stated intention to minimise this disruption as far as possible, but note that this planning is at a very early stage and in our view, too early a stage to give detailed comment. We therefore believe that the proposed mitigations should be put out for consultation separately when further developed.
- 4.3. In so far as we can comment on the information provided, we welcome the stated intention to use the river as far as possible to transport construction materials, but would like to see further details of the extent to which this will be possible in practice.
- 4.4. The likely road closures, to the extent that information has been provided, give us cause for concern that current congestion on the Peninsula has not fully been taken into account. This is particularly true when there are problems on the Southeastern rail network, as there are frequently, resulting in additional strain on North Greenwich station – and during major events held at the O2 Arena. Again, we would like to see more detail given when this is ready, with a separate public consultation.
- 4.5. We note that there will be significant movement of lorries on both sides of the Tunnel, with more on the north side. However, we are concerned that this will significantly increase noise pollution during construction for residents living along the A2, particularly affecting residents on Siebert Road and Westcombe Hill. The consequences of construction make it even more essential that an adequate noise barrier is constructed along Siebert Road as a matter of urgency.

5. Question (4) - 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.

- 5.1. We accept that user charging is needed to both manage demand and pay for the construction costs of the Tunnel, but believe there is a strong case for Greenwich residents and businesses, who are among those most affected by the scheme, to be exempted from tolling.
- 5.2. An exemption from tolling for Greenwich residents and businesses would be an appropriate recognition of the long-term underinvestment in transport infrastructure that the borough has suffered over several decades, and would go some way towards compensating residents for the prolonged disruption that construction of the scheme would cause.
- 5.3. We would similarly support the same exemption, on an equitable basis, for residents affected on the north side of the river. We fully support the other proposed discounts and exemptions as apply to the London Congestion Charging Zone.
- 5.4. We would welcome further clarity on how the appropriate toll level will be calculated, and under what circumstances it could be changed in the future. We would like to see an explanation of how this decision will be made, and what user and public involvement there would be in this decision.
- 5.5. We are concerned that the proposed peak/off-peak/free arrangement for tolling could produce undesirable edge effects, and would welcome further clarity on how this will be mitigated against and tackled should problems arise. For instance, the 10pm cut-off for tolling in the evening could see lorries travelling later at night, causing greater night-time disruption to residents along the A102 in particular.
- 5.6. We are also unconvinced by the lack of tolling at weekends in the current proposals, as the existing road network demonstrates that there can be considerable demand on Saturdays in particular – and the same case for tolling as a means to manage demand may well apply at weekends. We believe TfL should revisit this question in developing user charging plans further to ensure residents do not suffer negative impacts at the weekends.

6. Question (5) - 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

- 6.1. While we appreciate that significant concerns have been raised on the environmental impact of the Tunnel, in particular by the No 2 Silvertown campaign group that has conducted its own research, we believe these concerns do not sufficiently take into account the negative environmental and public health impacts already being brought about that current levels of congestion caused by the status quo.
- 6.2. We believe the proposal makes a convincing case that the status quo is a major contributing factor to poor air quality in London, with greater levels of emissions caused by standing traffic that would be reduced by lower congestion and greater resilience that the Tunnel will bring about.
- 6.3. However, we believe that TfL could still do a lot more to make the case for the positive environmental effects of the proposal to residents and to provide reassurance on this point. This remains the most contested aspect of the proposal, and TfL needs to do more to address the concerns that have been raised.
- 6.4. The report itself states that further modelling will be required to make a final judgment on the environmental impact – and so this strengthens our previously expressed view that this should not be the final consultation before the plans are submitted. Instead, the full and final Environmental Information Report should be completed and put to final consultation.
- 6.5. Many of the concerns that have been raised rest on the durability of assumptions made about traffic levels and congestion. We believe it would be beneficial if TfL publishes the environmental impact of a wider range of scenarios – including, so far as possible, modelling the effect should its various assumptions prove to be incorrect – so these can be held up to public scrutiny in a final consultation.
- 6.6. We believe it is essential that the scheme includes the installation of noise barriers along the A102, in particular in the case of properties along Siebert Road and Westcombe Hill. We note that the assessment for the Development Consent Order must include consideration of how the scheme will “contribute to improvements to health and quality of life through the effective management and

control of noise”, and as such the consideration of noise barriers is an essential component.

- 6.7. We also consider these noise barriers to be the minimum mitigation that is necessary. In particular, we believe that there is an opportunity for additional trees and shrubs to be planted along the existing A102/A2, and the new approach road, to further absorb air and noise pollution.
- 6.8. We would also suggest that TfL gives consideration to using the spoil from the tunnel to provide landscaping around the approach road.

7. Question (6) 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.

- 7.1. We believe the proposal makes a convincing case for the benefits to traffic flow and network efficiency in the Blackwall Tunnel element due to the increased resilience the scheme would bring to the road network.
- 7.2. We would like to see further details on individual mitigation strategies for any adverse traffic impacts that do arise as they are developed, and note that it is important these are consulted on as appropriate, with residents as well as the local authority.
- 7.3. However, we have particular concerns about the traffic impact at key junctions further south such as the Sun In The Sands roundabout and Kidbrooke Elbow. As we have previously argued, we believe the proposal must consider changes at these junctions as part of the scheme, particularly given that the report itself states that traffic impact will be felt significantly further afield than the immediate vicinity of the Tunnel.
- 7.4. Ultimately, the success of tolling in managing demand will be key in managing traffic impact at key points, and this reinforces the need for more clarity on how tolling will be modelled.
- 7.5. Smarter traffic management has been cited as a solution to many challenges in managing traffic impact, but we would like to see an assurance that adequate resource will be invested in this aspect of the scheme to ensure that the claimed benefits do materialise.

8. Question (7) - 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.

- 8.1. We strongly welcome the outline cross-river bus service plans that have been developed since the 2014 consultation. Our position has always been that the Tunnel must include a significant public transport element – and while in our view this should primarily be achieved by a far more ambitious, radical proposal including a DLR extension to Eltham – cross-river bus services are also essential if the proposal is to realise the full benefits possible.
- 8.2. It is right that these public transport benefits should be experienced directly by residents further afield than solely the immediate vicinity of the Tunnel, including the south of Greenwich borough, and as such strongly welcome the proposed new 'Grove Park to Canary Wharf' and 'Eltham to Beckton' bus routes.
- 8.3. We believe further potential bus routes should be explored, including benefiting residents in Shooters Hill, and look forward to scrutinising the more details proposals when they become available in the future.
- 8.4. However, we note that buses will still not benefit from a dedicated lane in the Tunnel, which would ensure that public transport remains the most attractive option possible to users and one that is not subject to congestion when it arises. We believe that consideration should be given to this arrangement, at least in anything other than extraordinary conditions.

9. Question (8) 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.

- 9.1. As highlighted throughout this response, we believe the proposed scheme represents a missed opportunity for a significantly more ambitious, radical solution that would include bringing a new DLR extension to Eltham. Current transport problems in South East London are the result of decades of under-investment in our transport infrastructure, and we fear that the decision not to consider incorporating the DLR in this scheme will come to be seen as yet another example of short-sighted thinking.
- 9.2. We believe the inclusion of a DLR extension, bringing the DLR along the route proposed by Hyder Consulting's report for Greenwich Council (which we understand was never formally considered or submitted to TfL) in 2011 via Kidbrooke and Eltham, would be transformative for the South East London economy.
- 9.3. Bringing the DLR to Kidbrooke and Eltham would help to take a significant amount of traffic off the road network, helping to manage demand at Silvertown and Blackwall, reducing congestion and pollution and thus ultimately helping the scheme to achieve its objectives.
- 9.4. It is clear that the cost of a DLR extension would be significant – perhaps as significant as the current predicted cost of the Silvertown Tunnel itself – however we believe that after decades of underinvestment, this expenditure is long overdue. The cost would of course in part be recouped over time through increased use of the DLR network, and could also be recovered through the proposed Silvertown and Blackwall tolling system
- 9.5. We note that TfL has been clear that tolling will need to continue ad infinitum beyond the Silvertown construction cost recovery point, for the purposes of demand management – but it is not clear what receipts after this point would be used for. Recovery of the costs of DLR would be an entirely appropriate use of these future receipts, through a similar mechanism.
- 9.6. From our previous interactions with TfL we do not believe that the DLR option has been given sufficiently serious formal consideration. We believe this is in part because Greenwich Council has failed to make the case for investment, including its regrettable decision not to even submit its own externally-commissioned study on this in 2011. We believe that this must be rectified before any further progress is made with the proposal.

- 9.7. We therefore recommend that TfL halts its current timetable and gives serious formal consideration to inclusion of the DLR in to the proposed scheme, and puts an alternative plan to formal consideration.
- 9.8. We further note with disappointment TfL's assessment that the design of the Tunnel would not render it suitable for cyclists. Separate cycle lanes included in schemes in Holland have previously been held up as good examples of tunnel design and we would like further details of why this option has not been considered.
- 9.9. We believe that just as TfL must improve public transport to the south of the borough through a DLR extension to Eltham, so too must public transport links be improved elsewhere – and the construction of the Silvertown Tunnel must not reduce the focus on wider public transport issues in South East London.
- 9.10. Further to the point above, we strongly support an extension of the London Overground from Barking Riverside to Thamesmead and Abbey Wood, and the extension of the Bakerloo Line to Lewisham.
- 9.11. We also believe, like the Mayor of London, that Greenwich is an ideal place for an extension for the successful Cycle Hire Scheme and believe strongly that this should be extended to Greenwich Town Centre as soon as possible. We are disappointed that Greenwich Council has so far refused, for its part, to make a pro-active proposal to TfL on this point. While the Cycle Hire Scheme would affect only a small number of journeys, it would still make a contribution, albeit a small one, to freeing up space on public transport and taking traffic off the road – and more importantly would boost tourism and improve convenience for residents in Greenwich.