

## **No to Silvertown Tunnel - response to Greenwich Peninsula Masterplan planning application - reference 15/0716/O**

### **Introduction: Who we are and how we got here**

No to Silvertown Tunnel is a group set up by residents in south-east London concerned about the impact of Transport for London's proposed road crossing between the Greenwich Peninsula and Royal Docks. We've measured air pollution on both sides of the Thames, met politicians and planners, held public meetings and campaigned for a more sustainable vision for transport in London.

We appreciate that many people find it difficult to cross the River Thames between east and south-east London, but we feel the option promoted by TfL and several local politicians will do little to ease congestion at the Blackwall Tunnel. Indeed, it will merely add to congestion and pollution on the A102, particularly southbound<sup>1</sup>.

Reinforcing this road's status as a "strategic route" and encouraging more traffic to use the peninsula as a bypass will act as a brake on regeneration and sustainable development on the Greenwich Peninsula. Businesses on both sides of the river - including Southern Gas Networks and the ExCel exhibition centre - noted the futility of adding more traffic to already-congested roads in their response to TfL's recent consultation into the scheme<sup>2</sup>.

We believe the Silvertown Tunnel is the wrong scheme in the wrong location. It should be cancelled and replaced with alternative schemes that promote public transport, walking and cycling between the Greenwich Peninsula and communities north of the Thames.

### **Why we're commenting and what we'd like to see**

We're pleased to see that Knight Dragon is not depending on the tunnel for its plans to go ahead. Yet whether or not the tunnel is built, we feel the proposed transport plans for the peninsula are inadequate, and risk leaving residents and businesses with few options for travelling to and from their homes and places of employment.

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<sup>1</sup> Trunk Roads and the Generation of Traffic, Department of Transport, 1994  
<http://webarchive.nationalarchives.gov.uk/+/http://www.dft.gov.uk/pgr/economics/rdg/nataarchivedocs/trunkroadstraffic.pdf> (among many pieces of research into this issue)

<sup>2</sup> TfL Silvertown Tunnel consultation report, March 2015  
[https://consultations.tfl.gov.uk/rivercrossings/silvertown-consultation/user\\_uploads/silvertown-tunnel-consultation-report.pdf](https://consultations.tfl.gov.uk/rivercrossings/silvertown-consultation/user_uploads/silvertown-tunnel-consultation-report.pdf)

We believe the Greater London Authority, Greenwich and Tower Hamlets councils, and relevant landowners should be looking urgently at providing a link for pedestrians and cyclists between the Greenwich Peninsula and Canary Wharf.

Without a pedestrian/cycle connection to Canary Wharf, any further intensification on the peninsula will simply be unsustainable.

### **A word on this planning process**

Firstly, we feel it would be remiss to not comment on the way this application process has been carried out. Treating this enormous planning application in the same manner as an application to build a domestic extension, with minimal publicity and a restricted timeframe to scrutinise 191 documents shows a lack of respect for the people who will have to live with the consequences of whatever decision is made.

Its timing - coinciding with a general election campaign and another large application at nearby Enderby Wharf - has been regrettable to say the least.

### **Is the traffic modelling reliable?**

Part 8 of Knight Dragon's transport summary contains predictions for traffic levels on Greenwich Peninsula in 2031 if the Silvertown Tunnel is built. This is the first time traffic predictions for a Silvertown Tunnel in 2031 have been published - even TfL's consultation in late 2014 restricted itself to 2021, just after the tunnel is planned to be built.

The figures, which use TfL's own modelling, do not take into account induced traffic (the traffic generated by building new roads). We find many predictions are risible, especially considering TfL is openly admitting to a 20% rise in traffic on the Blackwall Tunnel Southern Approach, even with tolling to manage demand.

In particular, we find the predicted large drops in morning peak traffic at the Blackwall Tunnel baffling when most tunnel traffic is heading to and from destinations reached via the A12, which would be difficult to access from the Silvertown Tunnel's northern exit at Tidal Basin Roundabout.

We would remind you that the Hyder Consulting report into a possible Eltham DLR extension, submitted to Greenwich Council in May 2012, predicted the new road, if built without a public transport alternative, "would encourage traffic growth as and when new developments come on stream", a process which would risk exhausting capacity<sup>3</sup>.

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<sup>3</sup> Executive summary: [https://853blog.files.wordpress.com/2014/04/eltham\\_dlr002.pdf](https://853blog.files.wordpress.com/2014/04/eltham_dlr002.pdf)

TfL is still not proposing a substantial public transport alternative to the Silvertown Tunnel. Neither study envisages other road crossings being opened, indeed, Knight Dragon is assuming the Woolwich Ferry is still in operation.

So the planning board should consider which version of the future strikes it as most realistic - Hyder Consulting's fears of gridlock, or Knight Dragon's huge drops in Blackwall Tunnel use.

The TfL modelling used by Knight Dragon is not open to public scrutiny. We would suggest councillors and planners question the assumptions behind both these figures and the traffic modelling throughout the scheme.

### **Current proposals show an over-reliance on North Greenwich station**

Knight Dragon's new masterplan contains a significant increase in housing, and is certainly more ambitious in the employment and leisure opportunities it envisages for the Greenwich Peninsula.

But it is over-reliant on North Greenwich underground station as a means of accessing the peninsula. The station is the eighth busiest outside zone 1<sup>4</sup>, and is already heavily congested in weekday rush hours and when the O2 hosts major events.

Most London Underground stations are usually expected to serve their immediate locality and adjacent neighbourhoods. But North Greenwich serves an enormous catchment area, stretching out as far as Eltham and Thamesmead, and there are demands for it to serve more areas, notably Kidbrooke Village<sup>5</sup>.

It's certainly true that the Jubilee Line has transformed travel in Greenwich, Charlton, Blackheath and surrounding areas. But it seems we are asking a lot of North Greenwich station before the Greenwich Peninsula is even half-built.

It is true that Crossrail - which regrettably will not directly serve North Greenwich - will provide some short-term relief. But even London's transport commissioner believes it will be "full within months"<sup>6</sup>.

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<sup>4</sup> <http://www.tfl.gov.uk/corporate/publications-and-reports/underground-services-performance>

<sup>5</sup> <http://www.kidbrookeregeneration.info/index.cfm?articleID=214&newsArticleID=235>

<sup>6</sup>

<http://www.theguardian.com/uk-news/2014/sep/21/london-lack-affordable-transport-risks-sparking-riots-tfl-chief>

## **A new bus station is very welcome - but it's not enough**

Anyone who has ever used North Greenwich bus station at rush hour will be pleased to hear Knight Dragon plans to rebuild and expand it.

But we feel the current plans - offering space for 17 bus stands rather than 15, and 11 bus stops rather than seven - aren't sufficient.

With long-term demands for a service to Kidbrooke Village, the possibility of the Greenwich Waterfront Transit being revived<sup>7</sup>, and the need to solve continuing capacity problems on the 108 to Blackheath and Lewisham<sup>8</sup>, we believe more stands and stops will be needed to serve not just residents on the peninsula itself, but those in surrounding areas and further afield.

But most importantly, Greenwich Peninsula residents will need an alternative to the Jubilee Line. This would relieve pressure on the service, provide an option to use in times of disruption, and make it easier for new residents to travel to and from Canary Wharf.

## **A new pedestrian and cycle connection to Canary Wharf**

We believe that the Greenwich Peninsula can only reach its full potential if it is better linked to its nearest neighbour: the economic, leisure and transport hub of Canary Wharf.

The failure to attract businesses to occupy 6 Mitre Passage is proof of how poorly the area is viewed by companies looking for office space. Indeed, it is notable that Greenwich Council recently placed an Article 4 designation on both Mitre Passage and its neighbouring block in Pier Walk to prevent them from being converted to residential use<sup>9</sup>.

There is nothing in Knight Dragon's masterplan that will improve connections between the Greenwich Peninsula and the rest of London. And there is little in the way of action or encouragement from other bodies to fix this.

While a Silvertown road tunnel offers potential for buses to take a circuitous route to Canary Wharf, this benefit is outweighed by the tunnel's dependence on the congested A102/A2 route

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<sup>7</sup> As mooted in the Charlton Riverside Masterplan

[http://www.royalgreenwich.gov.uk/site/custom\\_scripts/core-strategy-examination-library/examination-documents/Issue-09/Issue-09-RBG.pdf](http://www.royalgreenwich.gov.uk/site/custom_scripts/core-strategy-examination-library/examination-documents/Issue-09/Issue-09-RBG.pdf)

<sup>8</sup> News Shopper, 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>9</sup> [http://www.royalgreenwich.gov.uk/downloads/file/2498/pier\\_walkmitre\\_passage\\_article\\_4\\_direction](http://www.royalgreenwich.gov.uk/downloads/file/2498/pier_walkmitre_passage_article_4_direction)

to the south, and the A1020/A1261 towards the Canary Wharf and the City, and the likelihood that the tunnel will exacerbate this congestion.

The Emirates Air Line - with no regular Oyster card commuters, and increasingly marketed as a tourist attraction - is not a solution as it runs in the wrong direction to Canary Wharf and charges premium fares. While it remains outside normal TfL fare structures, discouraging its use for commuting for all but its nearest neighbours, the cable car can not be taken seriously as a transport connection.

Any ferry connection between Greenwich Peninsula and Canary Wharf will be little better. As with the cable car, premium fares (as charged by current Thames Clippers services) restrict usage to only the area's most well-off residents.

Instead, Knight Dragon, Greenwich Council, the Greater London Authority and other partners should be investigating the possibility of creating a pedestrian and cycle connection between Canary Wharf and North Greenwich, to aid resilience and boost links between the two.

A pedestrian/cycle connection would be accessible to all, from cleaners to chief executives.

Without it, the sustainability and vitality of what seems set to be largely a dormitory development has to be questioned.

### **A North Greenwich to Canary Wharf bridge is a challenge, but possible**

A bridge between Drawdock Road and the Isle of Dogs was assessed as part of TfL's London Cable Car need and business case ahead of planning permission being applied for in 2010<sup>10</sup>. It set the cost at £90m - which appears to offer good value compared with the £60m bill for the Emirates Air Line.

While there will be engineering challenges in bridging a river used by large vessels, the assessment says a scheme could be "iconic" and would be "likely to encourage investment" in North Greenwich and Canary Wharf.

In addition, with the key centres of activity growing in both locations, the problem of depositing pedestrians and cyclists in unattractive areas is disappearing.

A bridge would be a landmark for cruise liners heading to the new terminal at east Greenwich. It would also promote walking and especially cycling in the area.

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<sup>10</sup> "Cable car need and business case" via [whatdotheyknow.com](https://www.whatdotheyknow.com) - TfL ref FOI-0844-1112  
<https://www.whatdotheyknow.com/request/87261/response/228048/attach/3/Cable%20car%20need%20and%20bus%20case%20redacted.pdf>

Indeed, a pedestrian and cycle crossing would aid bringing the London Cycle Hire scheme to North Greenwich - the new Santander branding even features the O2, despite the scheme not actually serving the area.

### **There is a proposal for a bridge at Rotherhithe - why not for Greenwich?**

Sustrans has proposed a bridge for the west side of Canary Wharf, linking it to Rotherhithe, which the government's 2014 National Infrastructure Plan said would be "worth looking at in more detail"<sup>11</sup>, while the Mayor of London has indicated he would back consider backing a scheme<sup>12</sup>.

If the Greenwich Peninsula is to be taken seriously as an integral part of inner London - rather than an obscure location out on a limb, fit only for motorway bypasses - a similar crossing should be considered.

Just as at Rotherhithe, a crossing to Canary Wharf would also promote walking and cycling in the wider area - particularly cycling, where it would form an attractive commuter route from Charlton, Woolwich and other points in the Royal Borough of Greenwich as well as relieving pressure on the existing Greenwich Foot Tunnel.

### **Conclusion: Doing nothing is not an option - this time it's true**

If Greenwich Peninsula is to become a sustainable community that attracts both residents and businesses, then increasing capacity for walking and cycling is a must. It must be easier for people to easily travel short distances without resorting to driving or putting pressure on public transport.

This should apply to trips to employment, shopping and leisure at Canary Wharf as much it should apply to trips to Greenwich town centre, the retail parks in Charlton, East Greenwich's shops or football matches at The Valley.

We appreciate that Greenwich's planning board won't be able to magic a bridge out of thin air when it meets. But we believe the revision of this masterplan provides an opportunity for politicians and planners to consider a more sustainable future for Greenwich Peninsula, and how it could be funded.

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<http://road.cc/content/news/138077-government-says-cycling-bridge-across-thames-canary-wharf-worth-looking>

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<http://road.cc/content/news/133819-mayor-london-open-canary-wharf-cycle-bridge-%E2%80%93-asks-whether-it%E2%80%99s-sort-curly-wurly>

A favourite mantra of those who are promoting the Silvertown Tunnel is “doing nothing is not an option”. To be frank, we’ve found this actually means they’re unwilling to consider the consequences of their actions and would rather avoid answering difficult questions.

But relying on North Greenwich station (and a possible road tunnel) won’t ensure a sustainable, successful community. Doing nothing about an alternative link to Canary Wharf really isn’t an option.

Creating a pedestrian and cycle connection across the Thames to one of London’s biggest economic hubs will challenge perceptions that Greenwich Peninsula is inaccessible. It will cement the new district’s success and create additional capacity on existing public transport.

Whatever our disagreements over the Silvertown Tunnel, we urge politicians and planners to take this suggestion seriously, for the sake of the future of the Greenwich Peninsula as well as neighbouring communities both within and beyond the borough of Greenwich.

**No to Silvertown Tunnel ([www.silvertowntunnel.co.uk](http://www.silvertowntunnel.co.uk))**

**24 April 2015**