

No to Silvertown Tunnel - initial response to Planning Inspectorate, 15 August 2016

The No to Silvertown Tunnel campaign is a community-based group of east and south-east London residents who are opposed to the construction of the Silvertown Tunnel.

We work with other residents and community groups to raise awareness of the scheme's impacts on air quality, noise levels and traffic congestion, as well its effects on the health of individuals and communities.

We have responded to previous consultations, and have met TfL on several occasions to discuss the project. We now would like to register as objectors to the Silvertown Tunnel.

The points we will make include:

- TfL's claims that the Silvertown Tunnel will increase resilience for this road corridor are unjustified. The tunnel will simply displace traffic into the already heavily-congested local road system.
- The business case does not adequately consider the economic impacts for users.
- The scheme will not support regeneration in the immediate or the wider areas, as claimed.
- The Silvertown Tunnel will not provide economic or social benefits to the to people living in areas most in need of regeneration locally, notably North Woolwich and Thamesmead.

Congestion:

- The levels of traffic on the Silvertown Tunnel and Blackwall Tunnel cannot be controlled in the way TfL has laid out.
- The scheme will cause traffic levels to rise, with increased congestion across a wide area, north and south of the Thames, both on main trunk roads and local roads through areas including (but not limited to) Greenwich and Canning Town.
- TfL has not properly considered a wide range of alternatives including public transport.
- Real-world examples of induced traffic would suggest that TfL has not taken sufficient account of the phenomenon. Furthermore, its strategy for mitigation is not sufficient and strong enough to prevent a severe deterioration in local conditions, both in the immediate aftermath of opening and in the longer term once its five-year monitoring period ends.
- The risks to the Maritime Greenwich World Heritage Site from traffic congestion have not been properly considered.

Environmental impacts:

- TfL has not given adequate information on the scheme's likely environmental impacts - particularly regarding air quality - and its strategy for mitigation is insufficient.
- There is inadequate mitigation for noise pollution.
- The scheme provides improved access for northbound HGVs and coaches - but the resulting noise, pollution and congestion impacts have not been properly considered.
- The impact on London's overall air quality has not been fully considered in relation to current objectives.

Cost and opportunity cost:

- Provision of public transport in and between east and south-east London lags behind other London areas. Orbital public transport links could be improved.

Tolling and demand management:

- The charging structure's effects on traffic congestion on local roads has not been properly considered.
- What economic effects charging will have for users in relation to those in other parts of London, as well as the tidal patterns of traffic, have not been properly considered.

Provision of alternative solutions:

- Instead of building new roads, schemes to improve the management of traffic and the road network should be implemented.

Consultation:

- There has not been sufficient consultation with local residents and communities in areas that will be affected by the scheme.

We approved this submission at our committee meeting of 11 August 2016. We would be happy to answer any questions you have, and you can find more information about our campaign at www.silvertowntunnel.co.uk.