

Submission of Clive Efford MP to TfL's Silvertown consultation exercise, November 2015

I am writing to express my opposition to the current proposals from TfL for a river crossing at Silvertown.

There is no avoiding the fact that the congestion which occurs daily on the approaches to the Blackwall tunnel is an environmental disaster that cannot be allowed to continue. However, building a road without considerable expansion of public transport capacity across the river at this location will result in the new road system becoming heavily congested in the future.

Introduction

There are a number of factors that must be acknowledged before we can agree the details of the scheme, which the current proposals from TfL fail to address.

- The environmental damage of existing congestion on the approaches to the Blackwall tunnel cannot continue.
- A road crossing alone will not solve the problem.
- Any new crossing cannot be allowed to generate new traffic along the approach roads and surrounding areas.
- This scheme must not lead to widening of the A102 to accommodate traffic from outside of the adjacent areas to the tunnel approaches.
- We must recognise the importance of the crossing for local people from Greenwich, Newham and Tower Hamlets.
- We need to recognise that people in other parts of London do not pay to cross the river on their local bridges and this principle must apply to residents of the adjacent boroughs and they must be exempt from any toll.
- Building a road crossing without expanding public transport is not sustainable in the long term.
- South East London has lost out historically on investment in public transport and is not served by the London Underground beyond North Greenwich.
- North Greenwich is already a major transport interchange but we must further increase public transport capacity to meet long-term future demand.
- Extending the Dockland Light Railway (DLR) to North Greenwich will relieve pressure on the Jubilee Line as demand grows
- The expansion of Docklands has increased demand for crossing the river from the southeast to destinations in the east of London.
- The DLR is the most viable method of increasing public transport capacity across the river from Silvertown to North Greenwich.
- After completion of the Silvertown crossing- including a link with the DLR - the next phase of expansion for the DLR should be from North Greenwich to Eltham.

A public transport link is vital

I find it astonishing that the Mayor for London and TfL can once again come up with a major scheme – supposedly intended to tackle congestion – which does not include any significant improvements in public transport links. It is vital to include a crossing for the DLR to North Greenwich as part of the Silvertown tunnel scheme. Not only would that help develop

North Greenwich into an even-more important transport hub, relieving demand for extra capacity on the Jubilee line, it would create the opportunity to extend the DLR along the corridor of the A102 to terminate at Eltham.

Expanding capacity of the river crossings as TfL propose will generate extra traffic along the A102 and surrounding roads. The lack of a public transport alternative will add to the demand for road space and will inevitably lead to the approaches becoming congested with traffic once again.

Previous projects

Anyone with any knowledge of the history of road schemes in this part of London will know that failing to include radically improved public transport as part of a project like this is a mistake which has been repeated time after time. The second tunnel at Dartford was opened in 1980 after traffic levels at the original 1963 tunnel increased much more quickly than anticipated. We were told that the second tunnel would solve the problem of congestion once and for all. Instead we saw traffic levels continue to increase and in 1991 the Queen Elizabeth II Bridge at Dartford was opened. Once again, we were told that this new bridge would be the solution to all our problems of congestion once and for all.

In 2004 TfL came up with a proposal for the Thames Gateway Bridge in East London. At the public inquiry TfL claimed the bridge was an essential measure to tackle congestion. However, the proposals were rejected by the Inspector. He dismissed TfL's claims about the level of regeneration benefit the bridge would deliver; found that TfL's proposed tolling arrangements were unacceptable; and told them that their traffic modelling was inadequate. He found that the scheme would result in unacceptable levels of traffic, air pollution and noise.

Now we are being told we need a crossing at Silvertown – once again without any public transport improvements – to finally solve the problem of congestion. Under the current proposals from TfL the new crossing will, like every one of its predecessors, simply generate more-and-more traffic until in a few years' time we will be back in exactly the same situation looking at a further crossing – unless we make a significant improvement to our public transport system now.

The current situation

Whilst I agree with TfL that we cannot allow the present situation to continue, I do not think their proposals offer a sustainable solution.

The chronic traffic problem which exists at the Blackwall tunnel is underlined by the gridlock which occurs in the surrounding streets whenever there is the slightest hold-up, affecting people across my south east London constituency. More and more people are seeking to cross the river at this location and we must include a public transport alternative. For this reason, I have constantly demanded that the Mayor includes options for a public-transport link between Greenwich peninsula and Silvertown in his transport plans to reduce demand for more-and-more road space. The Silvertown Link was not even mentioned in the Mayor's 2009 transport consultation document. It was not until I started the campaign to get people to write into the consultation that he was forced to take notice.

I agree with TfL that we cannot simply allow the current situation to continue.

- On a normal day, there can be a two mile tail-back to access the Blackwall Tunnel, with queuing each side of the river
- The delays can regularly add around 25 minutes to journey times through the tunnel
- There are almost 1,000 incidents a year at the Blackwall Tunnel, including a large number caused by tall HGVs. Each one of these incidents has major knock-on effects across South East London. The Blackwall Tunnel need only be closed for as little as six minutes for there to be a three mile tail-back to the tunnel stretching back into my constituency.
- Around one million hours are wasted each year by people queuing for the Blackwall tunnel, costing around £10m in lost time

Air pollution

The people living in the areas around the A2, A20, A102 and the A205 South Circular already endure high levels of congestion and air pollution. The air quality levels around many of our schools in this area are higher than what is considered to be safe by the EU. According to the Government's own figures, 6.9 percent of total deaths in the Royal Borough of Greenwich are attributable to air pollution. This is significantly above the average for England of 5.4 percent.

In order to ensure that local people are not exposed to more environmental pollution generated by large volumes of traffic, and in particular congestion, any scheme must include measures to minimise the amount of traffic attracted to the area by the new river crossing.

Increased demands in the future

A road crossing will not be sufficient to meet the growing demands along this corridor which is used for access to central and north London and the Docklands.

The A102 is a major arterial route and demand and congestion will inevitably grow because of developments such as Kidbrooke and Ebbsfleet, if no remedial action is taken now.

London Docklands will grow substantially over the next decade. For example the development of Wood Wharf in London's Docklands on its own will create up to 25,000 new jobs, with approximately 2 million sq ft net of office buildings and over 1600 new homes.

In Ebbsfleet 17 million square feet of floor space will be developed over the next 20 years with up to 10,000 homes and 20,000 jobs. As traffic levels increase in the southeast area due to new traffic movements generated by these developments, the congestion that occurs every day on the approaches to the Blackwall tunnel will inevitably increase.

Measures to prevent increased traffic levels

The approach roads along the A102 are currently two lanes in either direction south of Kidbrooke. If the scheme was to include any widening of this section of the road it would add to the levels of traffic already drawn into the area surrounding the Blackwall tunnel. If

the scheme is to deal effectively with the existing levels of traffic it must not involve any plans to widen the A102.

Before any scheme is approved there must be a comprehensive Environmental Impact Assessment for the crossing and various means of minimising traffic generation must be included to ensure that the current situation is not made worse.

Lack of investment in public transport infrastructure in southeast London

A great deal of time is spent discussing the London Underground and the need to maintain it and expand it, but little attention is given to those parts of London that are not directly served by it. TfL is indicating that it intends to introduce bus services through the tunnels, but this does not address the considerable disparity between investment in rail services in southeast London and other parts of the capital which has left this part of London behind other areas. The DLR would go some way to addressing this situation.

Tolling

It is vital that we do everything possible to ensure that any crossing at Silvertown does not simply generate more traffic. The inclusion of the DLR will be a major step forwards in achieving this and will offer commuters an alternative to using their cars. It is inevitable, however, that tolling of some vehicles have to play some part. **However, I can see no justification for local users in the Boroughs of Greenwich and Tower Hamlets having to pay to use their local bridge whilst people in the west of London pay no such charge.** It is vital therefore that residents of boroughs either side of the crossing are exempt from any tolls.

Tolling people from the boroughs adjoining the Blackwall and Silvertown tunnels can only be justified if TfL introduce a toll to use all of the river crossings in central and west London.

Businesses located close to the tunnels will also be disadvantaged as many will have increased transport costs. Small businesses or self-employed individuals who travel and those with deliveries will have customers located either side of the river and their costs will rise with the introduction of tolling.

The tolls must be set at a rate which will deter people from outside of the boroughs close to the tunnels from using the new crossing in larger numbers than currently use the Blackwall tunnel. The tunnel is primarily used by local people as demonstrated in TfL's own statistics showing that one third of the daily trips using the tunnel start and end in neighbouring boroughs either side of the river.

North Greenwich as a major transport hub for southeast London

It is essential that any new crossing provides a link for the DLR between North Greenwich station and Docklands. The station has grown as a strategic interchange and the addition of the DLR will provide greater choice for commuters and help relieve the demand on the Jubilee Line.

North Greenwich is growing in its strategic importance as a major transport interchange and the DLR will create greater choice for people. Buses and the DLR are the stitching that

brings communities in the east Thames corridor closer together. As the east Thames area north of the river develops and expands, more job opportunities will be created which will increase the demand from people who live in this area for more public transport links. It will not be sufficient just to build another road tunnel.

Bringing the DLR on to Eltham

Once the DLR comes to North Greenwich then it is possible that it could be brought to Eltham along the corridor of the A102. There is land adjacent to the motorway almost along its entire length that would allow the new rail link to be built either alongside, or even above it. Stops could then be introduced along the route close to the Millennium Way shopping precinct, Sun in the Sands, Kidbrooke station, Westhorne Avenue and Eltham. The terminal at Eltham can be located beside the Pleasaunce, east of well Hall Road. If we are to tackle congestion and encourage more people to use public transport then we have to consider things that would previously have been thought to be out of the question.

Greenwich Council has already carried out a feasibility study into the North Greenwich/Eltham DLR link which concluded, *"It would vastly improve north-south public transport links and connect large swathes of Greenwich Borough with existing fixed-track services to/from Central London and other parts of the Capital."*

"The construction of an elevated DLR extension along the line of the A2-BTSA, would undoubtedly provide a very sensible, high profile facility along a recognised transport corridor with good legibility and minimum land take."

I make no apology for placing my community firmly on the transport map. I want to ensure that the problems that we face in this part of London are taken into consideration when future plans for developing public transport are considered

Conclusion

The current situation is an environmental disaster which cannot be allowed to continue. However TfL's current proposals do not address the core issue of lack of public transport alternatives linking southeast London with east London.

The introduction of new bus services is welcome but does not address the considerable lack of investment that has occurred over many years and buses can be cut while rail services are a long term commitment and not subject to delay on heavily congested roads.

TfL's plans also fail to provide an alternative to driving to cross the river at this location and do not take account of the increased demand that will come from developments in the southeast and eastern parts of London that will increase demand for more road space.

Any attempt to use tolling to control traffic levels should not disadvantage local communities either side of the proposed crossing. Local people and businesses should be exempt from any tolls.

If we make the correct choices now, we have a chance to radically improve transport in this part of London. If we continue to make the mistakes of the past by choosing only to build

roads then we will have missed this once-in-a-generation opportunity and we will see congestion—with all its consequences for pollution, employment and prosperity—continue to grow.

Without the extension of the DLR offering an alternative means of crossing the river other than taking up scarce road space, this scheme will at best give a short respite from the congestion that currently blights the approaches to the Blackwall tunnel before they clog up again.

For the reasons set out above I cannot support the scheme as proposed by TfL.