

East London river crossings Jan 2013

The London Forum of Amenity and Civic Societies is a federation of over 130 community groups across London.

We fully support the aim of reducing the current unacceptable levels of congestion around the approaches to the Blackwall Tunnel, and of promoting local regeneration in this part of London. However, we could only support the proposal for the construction of new crossings if it were part of a package of measures designed to ensure that there was **no overall increase in traffic levels in East and South-East London**, ensuring that the full benefits of reduced congestion would be realised through reductions in pollution and improved journey times, especially for local business traffic.

After expanding on the nature of the required package, we then consider the alternative options against which the suggested package needs to be compared, and finally comment on the requirements for the pre-application consultation should the Silvertown tunnel be considered through a procedure for infrastructure projects of National Significance.

1. It is widely accepted that providing additional capacity to alleviate congestion will, in the absence of other measures, lead to the generation of additional traffic, thus recreating congestion along with increased levels of local pollution and global emissions. To be acceptable, the Silvertown Tunnel and bridge/ferry further east must be part of a wider package including the following:
 - a fully-fledged (time-based) pricing system for the tunnel, designed to regulate demand to avoid congestion, rather than fixed tolls levied for the purpose of funding the construction. Consideration should also be given to deterring vehicles taking longer routes (eg, Rotherhithe Tunnel) to avoid any charges.
 - there should be maximum encouragement for the more sustainable forms of transport, most obviously by providing substantial priority for buses. An advantage of ferries is that they actually can cater for pedestrians and cyclists as readily as cars, but there also needs to be provision with the Silvertown tunnel, ideally in the form of a separate mini-tunnel alongside. The Emirates cable-car is not an acceptable alternative.
 - encourage local regeneration to be genuinely local, by promoting forms of business activity which result in shorter supply chains. In this respect, it is essential that any new crossing at Gallions Reach should not become part of longer-distance strategic routes. Its charging structure should therefore give priority to local traffic, and positively deter longer distance vehicles.
2. Since it can be argued that much of any benefit arising from the proposals for the Silvertown Tunnel will be due to the introduction of charging to regulate demand, any assessment of the merits of building the tunnel must include a comparison with the introduction of a charging system on the existing road network – both on the Blackwall tunnel alone, and more widely.

3. If, following this preliminary consultation, TfL decides to proceed with the proposals, the consultation during the pre-application stage for the “nationally significant” Silvertown Tunnel should seek a much fuller engagement and openness than is normally the case with public consultations. Once the environmental and economic assessments are published the process should both enable the public to use the analysis in an informed way by providing a full understanding of the analysis and its implications, and encourage a robust probing of its underlying assumptions. TfL should also demonstrate a willingness to further extend the range of the analysis in response to public suggestions, whether to examine additional aspects of existing options, or to look at the consequence of variations of the proposals. This would require a range of presentations and seminars, most focusing on the understanding the results of the analysis, but some designed to provide for more detailed examination of the methodology by fellow experts. There also needs to be provision for a sequence of seminars to cater for any revisions or extensions of the analysis.

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