Appendix 2: assessment of Transport for London’s reasons for changing the proposed Silvertown Tunnel from a category A tunnel to a category E tunnel

Cost

It has been advised by Transport for London that a category A tunnel would cost approximately £2.5 million more than a category E tunnel. This is considered to be a very small sum of money in the context of the cost of the scheme as a whole (nearly £1 000 million) and saving this sum appears to be a false economy given the benefits that would accrue from safely conveying dangerous goods across the River Thames without unnecessarily long routes via Central London.

Concurrent Operation of the Blackwall and Silvertown Tunnels

Transport for London’s position is that the shared Greenwich Peninsula approach road would increase the risk of vehicles conveying dangerous goods using the Blackwall Tunnel, which is an existing category E tunnel that is not capable of safely conveying dangerous goods. This does not seem to be a valid reason for designing the Silvertown Tunnel so as to also be incapable of safely conveying dangerous goods. The need to sign vehicles carrying dangerous goods away from the Blackwall Tunnel onto a diversion route is an existing situation. Currently the diversion is to Tower Bridge. A diversion to a category A Silvertown Tunnel would be a vastly shorter and less complicated diversion that would be much more likely to be complied with. The only operational situation when a category A Silvertown Tunnel would not represent a much less onerous diversion away from the Blackwall Tunnel would be when the Silvertown Tunnel was closed (for maintenance or because of an incident) but the Blackwall Tunnel remained open. The diversion in this instance would then revert to Tower Bridge—which is the existing situation. It is therefore not the case that a category A Silvertown Tunnel would increase risk at the Blackwall Tunnel or on the Greenwich Peninsula.

Diversion of Dangerous Goods Traffic from the Dartford Crossing

Transport for London’s position is that a category A Silvertown Tunnel would result in the diversion of dangerous goods traffic into South-East London and East London from outside London. This is unlikely to occur on any significant scale. The Dartford Crossing is a hybrid bridge/tunnel crossing, with the bridge being unrestricted and the northbound tunnels being category C tunnels, capable of conveying some dangerous goods under escort. Diversion of dangerous goods traffic into London from outside London would therefore only occur for northbound traffic, not southbound traffic, and only for those dangerous goods not suitable for passage through a category C tunnel. There is a time penalty involved in dangerous goods traffic waiting to be escorted, but this would not outweigh the time penalty involved in the 16-mile drive into Inner London to use the Silvertown Tunnel and then back out to the M25 again. The diversion effect would therefore only occur for a small proportion of dangerous goods traffic, and this traffic would already be diverting into Inner London and Central London to use the Central London road bridges. A diversion from outside London through South-East London to the Silvertown Tunnel is much shorter than one through South-East London to Tower Bridge.
Stakeholders’ Concerns

Transport for London’s position is that a category A Silvertown Tunnel would be of concern to a number of stakeholders, for the three reasons set out above. As these reasons do not appear to be convincing reasons for the construction of a road tunnel that cannot safely convey dangerous goods, these stakeholders’ concerns should be able to be removed or ameliorated by the provision to them of accurate information. In any event, these stakeholders’ concerns need to be set against other stakeholders’ concerns, including those, such as the City of London, the London Borough of Southwark and the Road Transport Association, who are concerned with the proposed continuation of the passage of dangerous goods into and through Central London.