

Sadiq Khan
Mayor of London
City Hall
The Queen's Walk
London SE1 2AA

3rd September 2019

Dear Mayor,

Open letter, re: pausing Silvertown Tunnel

Thank you for your letter of 4th June in response to our letter 26th March on the Silvertown Tunnel.

We write to urge you, given the pause on the project currently enforced on you by the legal case on contractors, to use this time to further evaluate this project against alternative solutions, in light of recent developments. We also request a meeting to discuss these alternatives.

As leading active travel and environmental NGOs, we are your allies in improving conditions for walking and cycling through the Healthy Streets approach. We support your determination to address London's air quality and climate crises. We strongly back your Mayor's Transport Strategy's aims to reduce motor traffic levels and the proportion of trips made in London by private motor vehicles. Yet we consider the Silvertown Tunnel is incompatible with these laudable policies, indeed it is likely to work directly against them.

We do appreciate the previous review of east London river crossings you undertook, and revisions to the Silvertown scheme to the extent it is now asserted that tolls would control traffic such that the scheme would result in no overall increase (or even a slight decrease), in traffic, air pollution or carbon emissions. However even this scenario presents problems, and we do not consider this scenario an adequate contribution to London's sustainable development.

Given the scale of London's air pollution and climate crises, their impacts on residents and your own policies, we believe all new transport schemes should properly contribute to addressing these problems rather than ignoring them, or even risk exacerbating them. This is the only likely way that not only will we be able to clean up our air and avoid the worst of the climate crisis, but that you will achieve your stated policy aims.

The Silvertown Tunnel risks doing the opposite.

1. Even assuming TfL's assertion that the Silvertown Tunnel will result in no additional motor traffic journeys (due to tolling), the negative impacts to congestion and thus air quality where traffic is redistributed to new areas would be serious and unacceptable. Indeed TfL acknowledges that, while slightly improving air pollution in some areas, the scheme would worsen air pollution in other areas where it would already be over legal limits. The Silvertown Tunnel must not be a hugely expensive method of simply redistributing existing road traffic, congestion and air pollution.
2. The evidence on "induced demand" is however that increases in road capacity almost invariably generate new traffic, particularly in already-congested areas such as East London. TfL asserts that tolling will be used to restrain trips at approximately current levels overall. But TfL's traffic modelling does not, we understand, assume that any actual new trips or

demand will be generated by the tunnel, nor any from any subsequent land use change. Yet we have recently seen an application for a lorry park, in anticipation it seems of Silvertown being built, which would bring more HGV traffic to the area (as well as raising concerns about the potential negative impact for the safety of people who walk and cycle in the area).

If the tunnel does, as history would suggest, result in further additional trips over time, then it would also result in more overall traffic, pollution and emissions. Alternatively, tolling would have to be increased after the tunnel opens, which could prove hard to do at all (let alone rapidly) once the fee structure is established.

3. The Silvertown Tunnel is predicated on keeping motor vehicle flows from north-south London and vice versa in the area broadly static. That stands in stark contrast with your Mayor's Transport Strategy's stated aim to effectively halve the proportion of motor vehicle journeys made (removing millions of them from London, overall, daily) by 2041. It also ignores the elasticity in current mode share that is identified by TfL that shows millions of daily car journeys that could easily be done by other modes. Further, the current trajectory of your strategy documents is not bold enough to achieve emission cuts that would see London holding up its end of the Paris climate change Agreement. In other words, you must make even more rapid and deep cuts to private motor traffic volumes to achieve your policy ambitions and deal with the climate crisis, yet Silvertown Tunnel will not play its part.

While it is clear current problems at Blackwall need addressing, the above warrant a careful consideration of viable alternatives prior to commencing with Silvertown. A full package of whatever combination of measures is needed must be evaluated. So far, this has not happened:

- a. TfL has confirmed its "max" alternatives package did not include considering measures to "throttle back" private motor traffic at the Blackwall Tunnel approaches, which could be done in stages - even back to the M25. This could include reallocating road space to a bus priority scheme at the Blackwall Tunnel approaches, improving bus services through Blackwall Tunnel. This would likely trigger "modal shift" as well as reducing private motor traffic capacity there. Reduction in private motor traffic capacity there would lead to "traffic evaporation", reducing emissions and pollution levels – a "road diet", as this approach is known.
- b. We also understand that tolling the Blackwall Tunnel (without building the Silvertown Tunnel) wasn't modelled to a level to address the current problems.
- c. There has also been no assessment that we can ascertain which includes the impact of any likely future London-wide road-user charging schemes on the levels of motor traffic using Blackwall and other east London crossings.

We believe these are ample reasons for you and TfL to re-evaluate the Silvertown Tunnel. But more, allowing the tunnel to move forward while the proposed walking and cycling bridge from Rotherhithe to Canary Wharf is paused due to costs, despite both being set out as part of the same package, seems additionally problematic. The bridge has potential benefits for the city's health, economy and environment, the Silvertown tunnel could well have the opposite effects; yet currently one moves forward and the other doesn't.

In conclusion, growing travel demand in East London should be catered for sustainably, as must the resolution of existing congestion. This proposed major road scheme is completely inappropriate considering the transport and environmental challenges facing London - and, if allowed to move forward, risks seriously damaging your own stated policies and ambitions for our great city, and would be an unfortunate legacy.

We urge you to at least evaluate the scheme against a fuller package of alternatives, although we think the reasons to scrap Silvertown Tunnel entirely are clear.

We therefore urge you to meet us to discuss these proposals and the alternatives available to you.

Yours,



Joe Irvin

Chief Executive, Living Streets



Paul Tuohy

Chief Executive, Cycling UK



Xavier Brice

Chief Executive, Sustrans



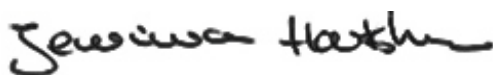
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