Summary

Traffic forecast
The traffic forecast has failed adequately to address the likely increase of traffic flows due to both latent and induced demand, let alone population growth. TfL's forecast of a reduction on private motor vehicle trips following the opening of the tunnel is not credible

Economic Assessment
The economic assessment identifies 20,000 jobs available north of the Thames for residents south of the Thames, which will be accessible by private motor vehicle. Given that TfL forecast a reduction in private motor vehicle trips either the economic benefit of the tunnel is false or the traffic forecast is false.

Charging to Control Demand
TfL has identified charging as their preferred mechanism to control demand. TfL have not provided evidence to show that this tool will be effective.

Environmental Assessment
The environmental impacts of the operation of the tunnel are dependent on the accuracy of the traffic forecast. If the traffic forecast is inaccurate, the environmental impact must also be inaccurate.

Full Submission

The proposed Silvertown/Blackwall Tunnel has the potential to have severe environmental impacts in the surrounding area. Transport for London (TfL) has a duty to honestly assess these impacts. This it has failed to do. The documents submitted are internally inconsistent and do not honestly assess the environmental impact from the operation of the Tunnel.

<u>Traffic Forecasting</u>

Latent and induced demands are inevitable impacts of a new road link. The Department for Transport report by the Standing Committee Advisory Committee on Trunk Road Assessment (SCACTRA) advised the government as long ago as 1994 that this was a probable outcome of new road links. Specifically the report stated that '…induced traffic will be of the greatest importance in the following circumstances:

- Where the network is operating or is expected to operate close to capacity
- Where the elasticity of demand with respect to travel costs is high as may occur where trips are suppressed by congestion and then released when the network improves;
- Where the implementation of the scheme causes large changes in travel costs

This suggests the categories of road where apprisial needs to be most careful are improvement to trunk roads in and around urban areas, estuary crossing schemes and strategic capacity enhancing inter-urban schemes including motorway widening.'
[Executive summary para 13]
The proposed tunnel fulfils all the conditions of a scheme likely to induce traffic from the government's own report.

In 1999, a study was made on the impacts of improved road links in London, including the impacts of the 1968 new Blackwall tunnel. The report concluded got the Blackwall Tunnel

- 142% increase in Blackwall Tunnel Traffic from approximately one year before the duplication of the tunnels [in 1968] to three months after, with the effects being felt chiefly during the peak periods.
- From 1962 to 1982 total traffic using the Blackwall Tunnels increased by 242%.
- There has been no significant reduction in traffic using the neighbouring inner crossings
- Large volumes of traffic have been generated by the duplication of the Blackwall Tunnels.

'The effects of strategic network changes on traffic'
http://worldtransportjournal.com/wp-content/uploads/2015/02/wtpp05.2.pdf

In 2006, the Campaign to Protect Rural England and the Countryside Agency commissioned a report to look at traffic impacts from more recent road projects

‘ Beyond Transport Infrastructure – lessons for the future from recent road projects’
http://www.transportforqualityoflife.com/u/files/Beyond-Transport-Infrastructure-fullreport%20July2006.pdf
The report ‘…demonstrated that traffic growth on the new routes in question was higher than forecast, sometimes quite dramatically so’ (para 3.1.1 Traffic flows)

The potential for both the release of latent demand and induced demand on completion of the tunnel is both real and significant. TfL have identified latent remand as an issue. The Transport Assessment states ‘there inevitably be a growth in trips made by private vehicles’…’demand for river crossing will ..Increase further..’ & ‘demand to flow southbound is forecast to increase from 104% to 142%’ [S3]

The assessment documents specifically address the need for a new tunnel
In the Transport Assessment 5.10.4 ‘In a future year scenario without the Silvertown Tunnel scheme, therefore, in the absence of new road crossing capacity there will be limited capacity for growth in road vehicle trips across the river between east and south-east London..’
Clearly the tunnel is designed to provide for the additional growth.

Despite the inevitability of additional traffic using the new crossing, TfL forecasts that the number of private motor vehicles using the new link will actually *fall*. The Transport Assessment states ‘…Total cross-river person trips by private vehicle reduces by 1,800 in the Assessed Case across the 24-hour weekday period (-0.22%)’ (para 7.2.9). This assertion is not credible. At the very least there should have been traffic modelling to show the impacts of the two tunnels operating at capacity on both traffic congestion in the surrounding (unimproved) road network and the effects this congestion would have on air quality and noise. Given the increase in traffic when the 1968 tunnel opened it is entirely conceivable that traffic levels would increase to more than the combined capacity of the new crossing. See also comments below in Dartford Tunnel.

Economic Assessment
Much has been made of the new tunnel opening up job opportunities the people through the use of the new crossing by *private motor car.* The Transport assessment states:
‘….Greenwich, Lewisham and Bexley are estimated to see over 200,000 additional potential jobs made accessible within a 45 minute journey time [by private vehicle]…’ [7.11.5]
However TfL’s traffic forecasts state that the number of private motor vehicle trips will *fall*.
Either the Economic Assessment if false or the traffic forecast is false. Both cannot be true.

Environmental Assessment
The environmental impacts of the operation of the tunnel are dependent on the accuracy of the traffic forecast. If the traffic forecast is inaccurate, the environmental impact must also be inaccurate.

User Charging and demand suppression
TfL explicitly state that user charging will suppress induced demand [User Charging section of Transport Assessment] and implicitly assert that user charging will also suppress induced demand. That TfL do *not* do is provide evidence to support either assertion. In case of a crossing or the Thames close by at Dartford, user charging seems to have *no* impact on control of traffic flows. The Dartford crossing has always been tolled, despite that, the capacity of the original tunnel crossing has had to be increased first by a bridge, in itself larger than the original tunnel and now proposals are under consideration for a further, tolled, crossing at Gravesend to meet the demand.
If user charging was an effective way of controlling demand, then TfL should have considered user charging on the existing, unimproved tunnel.

Conclusions
The environmental impact of the new tunnel is dependent on the volume of the traffic using it. The assessment by TfL has not addressed the possible, indeed likely environmental impacts of the tunnel. The application to build the tunnel should be rejected on the basis that the likely environmental impacts have not been assessed. The application could be reconsidered once a proper environmental impact assessment has been carried out.

If despite the above, the Planning Inspectorate is minded to approve the application, TfL should be required to take all necessary steps to ensure that traffic levels do not exceed those forecast in their application. The current arrangement where TfL and the host boroughs may take action if the environmental impact is more severe that forecast is insufficient.