

No to Silvertown Tunnel [SILV - 227]

Second Written Representation to Planning Inspectorate 14 December 2016

1. MODELLING AND FORECASTING

1.1. Section 3 of our Written Representation of 15 November 2016¹ deals briefly with our concerns regarding the Applicant's approach to modelling and forecasting.

1.2. In Section 5, we discuss specific concerns on the local impact of the Scheme which are not addressed by current forecasts. In particular, paragraph 5.4 deals with the impact on the A2/A102 southbound, while paragraph 5.15 deals with the impact on the Rotherhithe Tunnel.

1.3. The Applicant's Traffic Forecasting Report describes current forecasts as "the best estimate of most likely impacts of the Scheme which forms a single point within a range of possible outcomes"². While it is understood that uncertainty is inherent in any forecasting, decision makers have not been presented with a quantified estimate of the likelihood of the presented forecasts coming to pass. This is critical information, without which the assumed benefits of the Scheme cannot be fairly assessed: all forecasts associated with the Scheme are based on the traffic modelling applied. In general, individual behavioural changes are very difficult to predict using modelling³.

1.4. More information is needed on how price elasticity of demand will affect the volume of traffic. From discussions at the Issue Specific Hearing on 7 December 2016, we understand the Applicant has assessed cases at three price points. However, we feel this does not sufficiently support its claims that price flexibility will be effective in controlling traffic volumes. Following these discussions, we understand TfL is to supply more evidence for pricing decisions.

1.5. At the same Issue Specific Hearing, it was suggested that TfL's modelling was "optimistic". The Applicant's counsel responded by commenting "when the tunnel is open, we'll have real data". Considering the very real risks of increased pollution from this Scheme, and the current mayor's numerous public pronouncements on pollution, we feel this is an irresponsible attitude to take.

2. CORRESPONDENCE WITH THE MAYOR

2.1. Our second and final point concerns correspondence with the Mayor. We wrote to Sadiq Khan on 1 November 2016, seeking more information about his review of the Scheme. This letter is contained in Appendix C of our Written Representation of 15 November 2016.

2.2. As of 14 December 2016, we have still had no response from his office.

¹ REP1-059, [No to Silvertown Tunnel Written Representation](#)

² APP-105, [Traffic Forecasting Report - Sensitivity Testing](#), paragraph 1.1.2

³ *Individual Behaviour Change: Evidence in transport and public health*, University of the West of England/ Centre for Transport & Society, November 2009, particularly paragraph 3.3.
<http://webarchive.nationalarchives.gov.uk/20100413203302/http://www.dft.gov.uk/pgr/scienceresearch/social/behaviour-changes/pdf/transport-and-health.pdf>