

From: Dominic Leggett [REDACTED]
Sent: 05 March 2018 11:01
To: Natasha Kopala <Natasha.Kopala@dft.gsi.gov.uk>
Subject: Silvertown

Dear Ms Kopala,

This is just to copy to you directly (below) a comment I made through the Planning Commission system regarding TfL's most recent Air Quality Assessment.

I just wanted to ensure that your analysis of the viability and legality of the scheme will take account of the fact that, given the excess capacity that the tunnel creates, and the inevitability of induced demand from reduced journey times, all air quality forecasts TfL are providing are entirely dependent on there being political will to hold tunnel tolls to levels that will hold traffic to forecast levels. And that without a legal mechanism that ensures this, and that is immune to political interference, this is a very unlikely outcome.

I've also made a point about the fact that the scheme is building much more (very expensive) capacity under the Thames than is needed to attain its goals of congestion removal at existing traffic levels, and resilience - and that there is an alternative, much cheaper, option (that was never considered during optioneering) that could provide almost identical benefits. I am happy to provide more evidence to support this case if useful.

Best,

Dominic

Dear Ms Kopala,

This is a comment regarding TfL's Updated Air Quality Assessment for the Silvertown Tunnel.

I would like to draw attention to the fact that this air quality assessment is entirely predicated on effective future management of toll prices to keep traffic to the levels forecast - and that, for political reasons, this effective management is an unlikely outcome.

The tunnel, as designed, has capacity massively above its predicted use. Silvertown is expected to carry around 25,000 vehicles a day. Its theoretical capacity is somewhere similar to that of the Blackwall Tunnel, 100,000 vehicles/day. Therefore, if the toll is reduced to below the level needed to hold traffic to present-day levels, overall traffic through both tunnels will rise, until the point where it is either constrained by the lower toll level, or by the capacity of the approach roads. **The outcome in this case will be a rise in congestion around the tunnels (though not at the tunnels, due to the massive increase in capacity across the river), and a rise in pollution across the area.**

This is important as **the level that the toll is set at will be determined by the London Mayor - and so by the political incentives the Mayor faces.** Historically, politicians have

been willing to weaken measures designed to reduce congestion and pollution in order to get political support from drivers. The cancellation of the fuel duty escalator in the last few years' government budgets, and Boris Johnson's cancellation of the Western Congestion Charge Extension despite its clear congestion and pollution benefits are two recent examples.

A full analysis of the possible air quality consequences of building the Silvertown Tunnel, therefore, should show how air quality will vary across levels of tolling - from the case that TfL are presenting that in which tolls effectively control demand to hold use to existing levels of traffic - to that in which tolls are abandoned and demand is controlled by the capacity of the approach roads. I hope you will ask them for this.

Incidentally, as I noted above, the tunnel TfL are intending to build has massively more capacity (and is much more expensive) than the infrastructure that is actually needed to provide the capacity and resilience improvements that TfL want. Because the flow at Blackwall is tidal, nearly all the benefits of the proposed 2-bore 4-lane Silvertown Tunnel (and some other benefits) can be provided by a single bore 2-lane tunnel of slightly wider diameter than proposed with an escape route/bike/foot path under the roadway. As you will see if you look at the materials TfL have provided, this option was never examined during optioneering. As this option would save several hundred million pounds in construction costs, they should be asked to investigate its costs and benefits.

(TfL may argue that the full 2-bore Silvertown option allows better bus services - but if you look closely at their analysis, their suggestion of new bus routes is based on a survey, not a full analysis of demand. Where there is analysis of demand for trips, most of these go more directly through the Blackwall Tunnel - so one might suggest that the paucity of bus services here is a result of unreliability caused by congestion - which will be solved by a single-bore Silvertown option).

Best,

Dominic

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