

Response to the consultation on the proposed Silvertown Tunnel scheme

By email to Transport for London at rivercrossings@tfl.gov.uk

Do you support the Silvertown Tunnel scheme as a means to address congestion and closures at the Blackwall Tunnel, and support future growth in London? If you have any comments about our intention to apply for consent to build and operate the Silvertown Tunnel scheme, please let us know in the space below.

The Campaign for Better Transport is strongly opposed to the proposed Silvertown road tunnel scheme.

We oppose new road-based river crossings in east London as there is no evidence that building new road capacity will improve congestion or support economic growth in London. In fact, building a new road here is risky, causing induced traffic which will add to the congestion, noise and air pollution problems in the area.

Traffic impacts: We have described the traffic impacts of the Silvertown Tunnel scheme and explained that we would monitor its effects on traffic before and after opening. Further details are set out in the 'Preliminary Transport Assessment' and 'Preliminary Monitoring and Mitigation Strategy', which is available to download. We would take appropriate measures to mitigate any negative effects that might occur as a result of the scheme. These measures could involve adjusting traffic light timings or other traffic management measures. If you have any concerns about the effect of the Silvertown Tunnel scheme in any particular location, or comments about how we might mitigate these, please let us know in the space below.

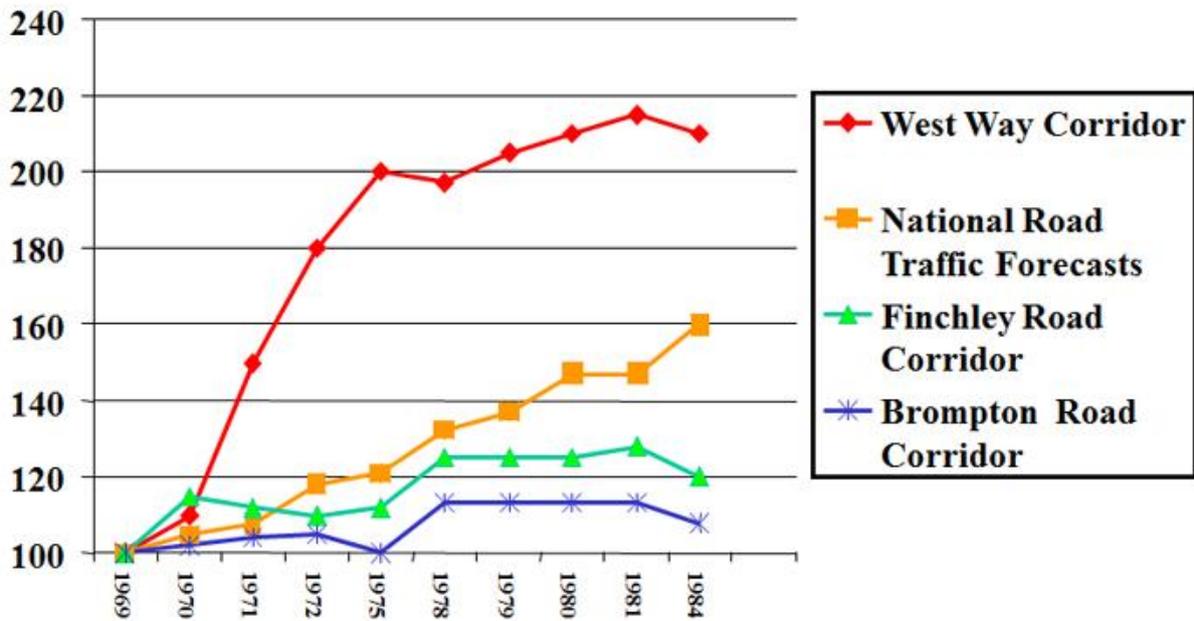
The principle of 'induced traffic' has been demonstrated repeatedly since 1925,¹ and the fact that it is most sharply seen when new road capacity is built in urban areas of existing congestion and suppressed demand was shown by the London roads studies of the 1980s, summarised in the chart below by John Elliott.² The same studies also showed that the widening of the Blackwall Tunnel in 1969 (doubling capacity) led to more than 100% of new traffic within one year of opening.

This phenomenon has again been demonstrated recently in a study of the widening of the A206 in Crayford. This showed both induced traffic and increased pollution once the road was widened.³

¹ Induced traffic. Again. And again. And again. Phil Goodwin, Local Transport Today 450 (2006) 24 <http://stopcityairportmasterplan.tumblr.com/post/19513243412/induced-traffic-again-and-again-and-again>

² The Effects of Strategic Network Changes on Traffic Steve Purnell, Jillian Beardwood and John Elliott. World Transport Policy & Practice 5/2 (1999) 28-48 <http://www.eco-logica.co.uk/pdf/wtpp05.2.pdf>

³ Degradation in urban air quality from construction activity and increased traffic arising from a road widening scheme. Anna Font, Timothy Baker, Ian S. Mudway, Esme Purdie, Christina Dunster, Gary W. Fuller. Science of the Total Environment 497-498 (2014) 123-132 <http://www.sciencedirect.com/science/article/pii/S0048969714010900>

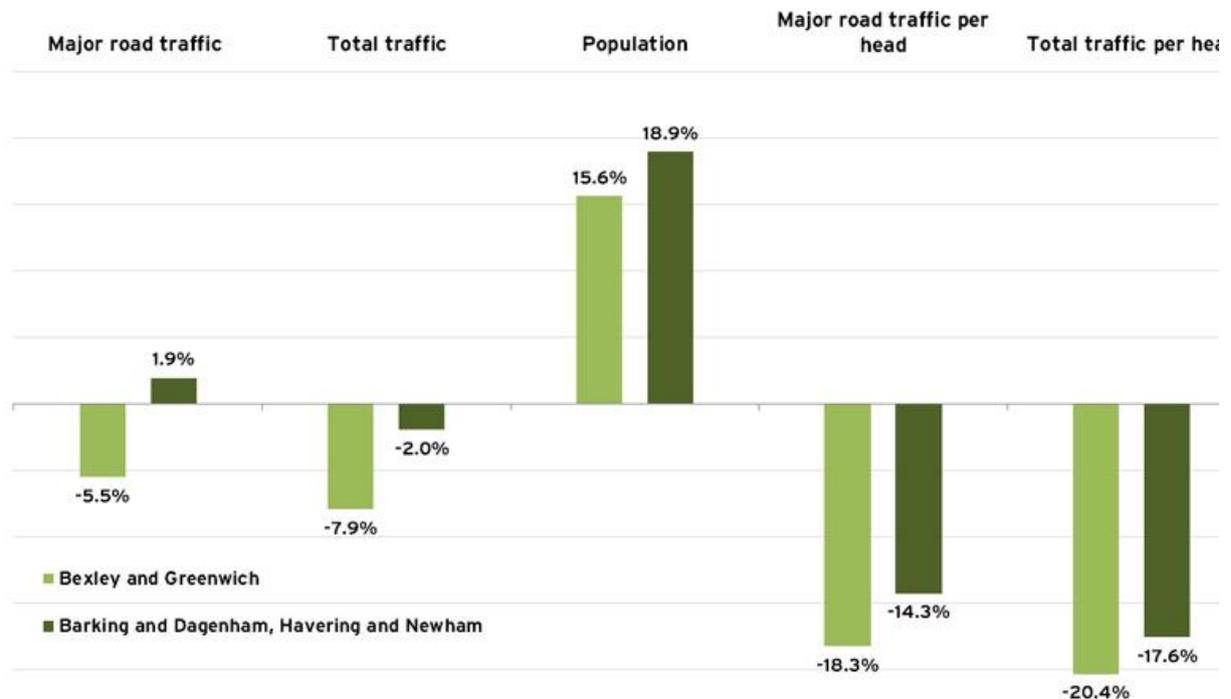


GLC London studies 1966-1986 showed induced traffic on the widened West Way road corridor

Even the expected increase in population of the East London boroughs in the coming years is not a reason to add more road space. As the chart below shows, since 2000, the boroughs north and south of the Thames in this area have seen rapid population growth without a corresponding increase in traffic – traffic per head has dropped between 14 and 20 percent in this period.⁴

⁴ Chart data from DfT Traffic Counts website <http://www.dft.gov.uk/traffic-counts>, London Datastore <http://data.london.gov.uk/datastore/package/office-national-statistics-ons-population-estimates-borough> and DfT Traffic Statistics table TRA 8901 www.gov.uk/government/organisations/department-for-transport/series/road-traffic-statistics

Traffic and population changes in East London - 2000 to 2013



User charges: As part of our plans for the new Silvertown Tunnel we are proposing to apply a user charge to both the existing Blackwall Tunnel and the proposed new tunnel in order to manage traffic demand and pay for the new tunnel to be built. The level of the charge would be set closer to the time that the Silvertown Tunnel opens, taking account of the conditions that exist at that time. Further details are set out in the 'Preliminary Charging Report', which is available to download. If you have any comments on our proposals for user charging please let us know in the space below.

The Preliminary Charging Report indicate that the proposed user charging will not reduce demand at peak times and the scheme, even with charging, will therefore contribute to increased air pollution. The proposed charging therefore fails to ameliorate for the effects of the scheme will have on induced traffic. If the scheme is not intended to increase traffic through this area, the same effect can be had by not building it at all and tolling the existing crossing. This would be a much cheaper and sustainable alternative.

Environmental effects: We have described the likely environmental effects of the Silvertown Tunnel scheme and described some mitigating measures we would take. Further details are set out in the 'Preliminary Environmental Information Report' (PEIR), which is available to download. If you have any comments on the likely environmental effects of the scheme and the proposed mitigation measures, or on any of the information set out in the PEIR, please let us know in the space below.

Because of the increase in traffic expected as a result of the scheme, we are concerned about the effects on air pollution, as the proposed new road tunnel is in an already highly polluted area.

Air pollution evaluation is a constantly evolving topic and the subject of much research. For example, the most recent EURO VI standards designed to reduce vehicle emissions have already been called into question in terms of the real-world reductions they will bring in the future.⁵ Defra modelling assumes that diesel cars will meet EU emissions standards, but this has been proven not to be the case. Many other factors are also involved in determining the concentrations of pollutants experienced by people living near busy roads.

There are serious questions, raised by the details of the Preliminary Environmental Information Report that we have examined, about the legality of the proposed scheme. The report concludes "A definitive judgement has not been made in terms of the overall significance of the Scheme". However, there are clear indications that air pollution in areas currently above the legal limits, and not expected to be below these limits until 2030 without new compliance measures, will remain above the legal limit with the scheme in place.

If this is the case, then it is likely the scheme cannot be pursued.

The legislation⁶ – along with the 2013 Supreme Court ruling that the UK is failing in its legal duty to protect people from the effects of air pollution,⁷ and the 2014 European Court of Justice judgment that the government must act to bring pollution within legal limits 'as soon as possible'⁸ – is clear that areas currently within legal limits cannot be pushed over them, and it is unlikely that projects that make pollution worse and delay compliance are permissible either.

⁵ High diesel NOx emissions 'likely for decades' due to failing tests. Transport and Environment, August 2014 <http://www.transportenvironment.org/News/high-diesel-nox-emissions-%E2%80%98likely-decades%E2%80%99-due-failing-tests>

⁶ Directive 2008/50/EC http://ec.europa.eu/environment/air/quality/legislation/existing_leg.htm

⁷ News about Supreme Court decision with links to summary and full judgment <http://www.healthyair.org.uk/clientearth-triumph-in-the-supreme-court/>

⁸ Court of Justice of the European Union, Judgment in Case C-404/13 The Queen, on the application of ClientEarth v The Secretary of State for the Environment, Food and Rural Affairs, November 2014 <http://curia.europa.eu/jcms/upload/docs/application/pdf/2014-11/cp140153en.pdf>

Cross-river bus services: The Silvertown Tunnel scheme would give us the opportunity to introduce new cross-river bus routes for east London. We have described an illustrative cross-river bus network for east London in the 'Preliminary Transport Assessment', which is available to download. If you have any comments on the introduction of new cross-river bus routes please let us know in the space below.

We support the provision of cross river bus services in east London. However, it is noted that the three existing crossings to the east of Tower Bridge currently carry only two bus routes, the hourly X80 service and the roughly 10 minute interval 108 service. It is therefore possible to improve existing cross river bus connections using existing road infrastructure and we encourage Transport for London to do so.

The report 'Alternative options considered to address the issues at the Blackwall Tunnel' provides an incomplete assessment of the public transport options available, such as pedestrian/cycling bridges and improved rail connections. The objective to increase public transport connectivity through this area is a laudable one, and would be more sustainably achieved through properly exploring these alternatives.

November 2015

Steve Chambers
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

16 Waterside, 44-48 Wharf Road, London N1 7UX
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