

Silvertown Tunnel Planning Inquiry ~ final written representations from Campaign for Better Transport

Summary

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment.

The Silvertown Tunnel planning application proposes a new four lane road under the River Thames between Silvertown and north Greenwich, parallel to the existing Blackwall Tunnel.

This final written representation follows our oral representation at one of the inquiry sessions and records the points made then on induced traffic; air quality; tolls; local benefit; resilience; and bus provision.

Campaign for Better Transport has previously made representations on the plans which set out our case against the proposals, and which are appended to this submission.

We welcome the scrutiny given the proposals during the Inquiry process. We submit that the tide of evidence and policy continue to turn against the application.

During the course of the Inquiry, there has been fresh evidence of induced traffic from new roads; the legal requirements on air quality have strengthened; Boroughs that previously supported the plans have spoken against them; and the applicant's position on tolls remains inconsistent.

Increased traffic

We reject the applicant's assertion that doubling road capacity through constructing the Silvertown Tunnel can possibly avoid increasing traffic through the area.

The phenomenon of induced traffic is well-known, and has been confirmed since the Inquiry hearings in a recent report *The Impact of Road Projects in England*. This detailed study of over 80 road schemes in England found that traffic increased across the board. Of 13 schemes studied in depth, the average increases over the short run (3-7 years; seven schemes) were +7%. Average increases over the long run (8-20 years; six schemes) were +47%. These were increases over-and-above background traffic growth.¹

This has been further underlined by the latest reports on traffic levels on the expanded sections of the M25 and performance of the Dartford Crossing, both of which have reported in the last month, and show continued traffic growth in excess of original projections..

Additional traffic through the Silvertown Tunnel is not simply a problem for the new road. Increased traffic will inevitably have a knock-on effect on local roads and streets which, as the Borough Councils affected have testified, has not been adequately modelled.

¹ Sloman L, Hopkinson L and Taylor I (2017) *The Impact of Road Projects in England Report for CPRE*

Air pollution

We reject the applicant's assertion that Silvertown Tunnel will not worsen air quality in the surrounding area. Even marginal increase in traffic levels will therefore make air quality worse, and it is beyond the applicant's power to prevent this.

While there are plans under the Mayor's ULEZ to increase charges for road use by some categories of vehicle, based on their emissions, there are no powers to ban them. Furthermore, real world driving tests of vehicles demonstrate that the majority of models emit more pollution than their lab classification allows.

We believe it is beyond the applicant's powers to deliver an air quality-neutral scheme, however good their intentions; yet that is a policy requirement under current legislation and in light of recent court cases. The Government's Clean Air Zone guidance is due to be published before the end of April and is likely to strengthen requirements for action on air quality. On these grounds alone, the application should be refused.

Nor do we find the argument that by reducing queuing, the Tunnel will improve air quality. There is no guarantee that queuing, caused by either crashes or heavy traffic volumes, will be eliminated by constructing the Silvertown Tunnel, given that new road capacity stimulates increased traffic levels.

Should the Mayor's ULEZ, and other policy changes lead to greater take up of electric vehicles in the future, that could have a positive impact on emissions but that is independent of whether the Silvertown Tunnel goes ahead or not.

Tolls

Introducing toll roads to central London is a radical step and in isolation from a comprehensive package of road pricing is likely to have unintended adverse consequences.

It is hard to see how a toll level could be set that would avoid such pitfalls. Too high and the charge will exclude local users who will therefore have all the pain of the Tunnel and none of the gain, and push more traffic onto existing crossings, in particular the Rotherhithe Tunnel. Too low, and there will be a real risk of drawing in additional traffic, including heavy goods traffic that currently uses the Dartford Crossing.

In its recent announcement on the Mersey Gateway, the Department for Transport limited neighbouring discounts, stating: "It is government policy that users of estuarial crossings should help pay for the benefits they receive". A similar approach should apply to the Silvertown Tunnel. Yet we note that the applicant has varied their toll proposals, contemplating wider discounts, in response to demands from neighbouring Boroughs.

This negates the value of traffic modelling based on earlier assumptions about toll levels and further undermines the case that there is any potential traffic reduction benefit from the Silvertown Tunnel proposals.

Benefit to the local area

We agree that improved transport connectivity is good for communities. However, what local people in Canning Town, Greenwich and beyond need is better access to the existing network with improved public transport links, public realm and traffic management, not new network capacity.

In fact, local people are least likely to benefit as London as a whole, and poorer communities within London, have lower car ownership and usage than the population in general. This trend has deliberately been encouraged by both borough and London Plan policies capping parking provision and encouraging 'car-free housing', car clubs and related measures, as well as the reallocation of parking land for residential use.

Using projected housing growth and job growth as an argument for increased vehicle movement goes against London policies, which have been a model of rail-led regeneration. Instead, we argue that a proposal more grounded in planning policy would see demand management of existing road capacity, combined with improved connections with Crossrail, extended Overground and DLR routes, and enhanced provision for walking & cycling, including better use of the existing cable car.

Resilience

As we have previously argued, we believe resilience of the existing road crossings would be better delivered by a package of demand management measures, which could include tolling the Blackwall Tunnel, implementing smart queueing, extending the congestion charge, etc.

No longer part of a package of crossings, the Silvertown Tunnel risks being, as others have said, the world's most expensive traffic management scheme. At worst it could even reduce resilience by increasing traffic at Rotherhithe and Tower Bridge as drivers seek to avoid the new tolls.

There is also the issue of financial resilience: the cost of the Tunnel is a huge drain on TfL budgets at a time when these are already under pressure with the loss of external revenue support.

Bus provision

We welcome the applicant's proposal for additional bus services should the Silvertown Tunnel go ahead. However, we note that these services could equally be deployed with single decker buses through the Blackwall Tunnel.

Indeed, such services could provide a valuable contribution to the stated goals of resilience, traffic reduction and local connectivity. Figures from Greener Journeys show that each bus typically replaces 200 cars, and unlike a tolled road connection, they are available to all, including the many non car users in the area around the proposed Tunnel.

Conclusion

Proposals for the Silvertown Tunnel, originally part of a package of road crossings sponsored by the previous Mayor, are now isolated and at odds with the thrust of TfL policy, which in all other areas is moving away from new roads, with a clear focus on modal shift, public transport, active travel and tough action on air quality.

The Panel will be doing London – and even the applicant – a service in refusing this scheme.

April 2017

Bridget Fox
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.

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Appendix I

Silvertown Tunnel Planning Inquiry ~ written representations from Campaign for Better Transport November 2016

Summary

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The Silvertown Tunnel planning application proposes a new four lane road under the River Thames between Silvertown and north Greenwich, parallel to the existing Blackwall Tunnel.

Campaign for Better Transport has previously made representations on the plans (attached to this representation as appendices A & B) which set out our case against the proposals.

Principal issues

The Inspectors have made an *Initial assessment of principal issues* in the Rule 6 letter (3 October 2016). We have structured our additional representations in response.

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1. Air quality, noise and other constructional or operational environmental impacts

The London Plan (March 2016) sets out clear policies for all development proposals in terms of improving air quality (Policy 7.14), which on their face would appear to reject the Silvertown Tunnel proposals. In particular, the policy calls for “greater use of sustainable transport modes” and that new development should “at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality”.²

We have previously expressed concerns that any increase in traffic volumes, even spread between the existing Blackwall Tunnel and proposed Silvertown Tunnel, will inevitably lead to a worsening in air quality, given that motor vehicles are responsible for 80% of NO_x emissions in areas around major roads. This concern is increased given the recent research showing that the tests on which current regulations rely “have found higher levels of nitrogen oxide (NO_x) emissions in test track and real world driving conditions than in the laboratory for all manufacturers’ vehicles”.³

The NPPF section 120 sets out a requirement to take into account “the effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution”. It is hard to see how the applicant can have taken the cumulative effects of pollution into account given these levels have been systematically underestimated by the current vehicle testing regime.

² London Plan Chapter 7 (March 2016) <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-seven-londons-living-spaces>

³ DfT Vehicle Emissions Testing Programme (April 2016)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/548148/vehicle-emissions-testing-programme-web.pdf

The 2 November 2016 judgement in the High Court Judgement on the case brought by ClientEarth against DEFRA on the adequacy of the Government's Air Quality Plan⁴ has further significant implications for transport infrastructure and operation which are not yet fully understood. Given the concerns expressed by Mr Justice Garnham about the adequacy of current air quality modelling, we believe that Transport for London should be directed to halt this application until a legally acceptable air quality model is developed and applied to the Silvertown proposals. We note the Rule 17 letter on this subject and await the responses with interest: however, we are not persuaded that any current model can, by definition, have taken into account this very recent ruling.

The ClientEarth judgement has further possible implications which should cause this application to be reconsidered: the impact of a more comprehensive Ultra Low Emission Zone; the potential for anticipated new legislation to restrict the most polluting vehicles; the potential for anticipated changes in the tax regime to encourage the scrappage of older vehicles. While such new policies may seek to reduce the overall levels of air pollution from vehicles, they are also likely to result in a reduction of vehicle numbers. This in turn would improve the resilience of the existing Blackwall Tunnel as well as its air pollution impacts, reducing the need for an additional road crossing at Silvertown, and bringing into question one of the fundamental assumptions supporting the application.

It is important to note that relying on a shift to electric vehicles (EVs) is not a complete solution to the problems of air pollution from vehicles, as the braking systems on EVs are significant emitters of toxic particulate matter (PM). Reducing overall traffic levels is likely to be a key element of any response to the High Court judgement, and it would therefore be flying in the face of both the law and emerging policy to approve a major new road in an area already subject to illegal levels of air pollution.⁵

The NPPF further requires using health impact assessments to consider any significant impacts on health; addressing health inequalities, providing equal access to healthier food and open spaces, and promoting active travel and physical activity.

The Health Secretary recently called the rise in obesity, particularly child obesity, "a national emergency"⁶ and it is particularly acute in the area around the Silvertown Tunnel. Londoners living in Richmond upon Thames are 1.5 times more likely to be physically active than those living in Barking and Dagenham. Public Health England has mapped health inequalities in London, showing that on a range of indicators, including obesity and levels of physical activity, east London boroughs fare worse than boroughs in the rest of the capital, contributing to a 16 year gap in life expectancy between men in the richest and poorest boroughs.⁷

To achieve the goals of public health policy, safer and more attractive provision for active travel, walking and cycling should be prioritised ahead of promoting a new generation of car-dependency. This application has severe negative impacts on the quality of the public realm at either end of the tunnel, with knock on adverse impacts on walking and cycling. This is contrary to the goals set out in key public policies including the draft national Cycling and Walking Investment Strategy which sets out to "make cycling and walking the natural choice for shorter journeys or as part of a longer journey".⁸

⁴ <https://www.judiciary.gov.uk/judgments/clientearth-v-secretary-of-state-for-the-environment-food-and-rural-affairs/>

⁵ IPPR and Kings College: Lethal and illegal (Nov 2016) <http://www.ippr.org/publications/lethal-and-illegal-londons-air-pollution-crisis>

⁶ <http://www.theguardian.com/society/2016/feb/07/childhood-obesity-national-emergency-jeremy-hunt-health-sugar-tax-jamie-oliver>

⁷ Public Health England, Health Inequalities in London (October 2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/467805/Health_inequalities_in_London_Oct_15.pdf

⁸ Draft Cycling & Walking Investment Strategy (DfT 2016)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/512895/cycling-and-walking-investment-strategy.pdf

Given what we now know about the public health crises in both air pollution and obesity, it would in our view be a backwards step to make even a marginal increase in road capacity without at least equivalent increases in capacity for sustainable modes, something that is not offered by the current proposals.

7. Policy and objectives

We do not believe, on the basis of evidence, that building a relatively short section of trunk road in inner London will make any long term positive contribution to relieving congestion or improving the resilience of the road network. There are many example of the phenomenon of induced traffic cited in our previous submission (at Appendix B).

The phenomenon of induced traffic is well-established. Indeed, Highways England's latest reports on the Dartford Crossing demonstrate that new road capacity cannot provide a sustainable long-term solution: *"Analysis of traffic data shows that traffic demand at Dartford has responded in step with capacity; such that whenever new capacity has been provided, it has filled up and created the need for more capacity. This has been a recurring pattern since the second tunnel was opened at Dartford in 1980 and then the QEII Bridge in 1991. Today there is insufficient capacity to cater for current and future traffic demand."*⁹

There is also a risk of displaced traffic on to local roads with adverse impacts on congestion, safety and environmental quality, particularly in the event of tailbacks or tunnel closures. Even if the tunnel is operating as proposed, any additional traffic will go on to join the existing road network, which is already experiencing severe congestion. This is at odds with a range of local and national policies, not least the requirements of the Road Traffic Reduction Act 1997 and the 2011 Sustainable Transport White Paper.¹⁰

We understand the need to tackle congestion. London is the 'congestion capital of Europe' according to the annual INRIX congestion report. It found traffic congestion in London had risen noticeably since 2012, with journey times in Central London increasing by 12 per cent annually, although the volume of car traffic continues to fall.¹¹ TfL's latest Travel in London report reports a recent fall in journey time reliability, with a 13 per cent increase in average traffic delay since 2013.¹²

The TfL Roads Task Force (2013) suggested that there was no one single cause of congestion: "the majority of the current unreliability, 79 per cent of it on the TLRN in a weekday AM peak is accounted by volume of traffic and day-to-day variability in traffic demand."¹³ The INRIX report suggests that the primary cause is temporary loss of capacity through road works and construction traffic, not a permanent, structural shortage of road space.

Private car use in London has been falling over a number of years, despite the growing population: car use as a share of all trips, has declined from a peak of 50 per cent in 1990 to a current level of 36 per cent¹⁴, with some analysts suggesting we have reached 'peak car'.¹⁵

This is common trend as cities grow: denser populations can support greater concentration of services, reducing the need for travel, while mass transit is the only viable solution for peak time commuter travel.¹⁶

⁹ Highways England Lower Thames Crossing Pre-Consultation Scheme Assessment Report https://highwaysengland.citizenspace.com/cip/lower-thames-crossing-consultation/supporting_documents/Scheme%20Assessment%20Report%20Volume%201%20%20Executive%20Summary.pdf

¹⁰ Creating Growth, Cutting Carbon Making Sustainable Local Transport Happen https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3890/making-sustainable-local-transport-happen-whitepaper.pdf

¹¹ INRIX 2015 Traffic Scorecard <http://inrix.com/scorecard/>

¹² TfL Traffic in London Report 8 <http://content.tfl.gov.uk/travel-in-london-report-8.pdf>

¹³ TfL Roads Task Force Technical Note 11 <http://content.tfl.gov.uk/technical-note-11-to-what-extent-is-congestion-andunreliability-on-the-road-network.pdf>

¹⁴ David Metz: Traffic congestion in London <http://peakcar.org/traffic-congestion-in-london/>

¹⁵ Professor Phil Goodwin: Peak car: evidence indicates that private car use may have peaked and be on the decline <http://www.rudi.net/node/22123>

The London Plan and national planning policy both prioritise focusing development on brownfield sites and around existing transport hubs in order to maximise the benefits of densification without generating adverse environmental impacts. The NPPF core principles seek to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and “focus significant development in locations which are or can be made sustainable”. This is seen in the growth of low-car and car-free housing policies in inner London, breaking the link between the provision of new homes and the provision of car space to match. Infrastructure planning decisions should support this benign trend rather than take a backwards step towards more road capacity.

We recognise that in London there has been a significant growth in commercial traffic (freight and construction traffic). Light goods vehicles (delivery vans) now make up 13 per cent of all motorised urban traffic. However a policy-compliant solution is not to increase the amount of road space available for freight vehicles, but rather to encourage better use of existing networks through delivery consolidation and modal shift, in line with the latest local (London Plan) and national policy.

To quote the most recent DfT freight policy, “The Government has set a stretching and legally binding Fifth Carbon Budget which will see a 57 per cent reduction in emissions in 2032 compared to 1990 levels, on a path towards reducing emissions by 80 per cent by 2050 as set out in the Climate Change Act. Government is committed to ensuring that transport plays a full part in delivering the economy-wide emissions reductions needed to meet this target. Currently domestic transport emissions make up nearly a quarter of total UK domestic greenhouse gas emissions, with road freight a significant contributor – in 2014 HGVs were responsible for 17 per cent of total UK transport emissions. Shifting more freight from road to rail therefore has the potential to make a real contribution to meeting the UK’s emissions reduction targets.”¹⁷

An approach based on sustainable modes would sit far more comfortably with the NPPF which advocates that “economic, social and environmental gains should be sought jointly and simultaneously through the planning system” as well as the Mayor of London’s transport strategy which aims to “reduce the need to travel, encourage the use of more sustainable, less congesting modes of transport (public transport, cycling, walking and the Blue Ribbon Network), set appropriate parking standards, and through investment in infrastructure, service improvements, promotion of smarter travel initiatives and further demand management measures as appropriate, aim to increase public transport, walking and cycling mode share”. It is difficult to see how the current proposals would meet these requirements.

The higher traffic volumes and encouragement of car use arising from new road capacity would be at odds with other key public policy priorities not least carbon reduction. The UK has a binding target of an 80% CO2 emissions reduction by 2050 and reducing transport emissions is key to achieving this. As part of its contribution to the Paris Agreement, which came into effect this month, the UK Government has further committed to doubling the EU’s economy-wide emissions reduction target to at least 40% by 2030.¹⁸ This requires a joined-up policy to encourage strategic modal shift to sustainable modes and reducing the need to travel, which is undermined by proposals for major new road capacity such as the Silvertown Tunnel.

8. Redevelopment, urban renewal and other socio-economic issues

In terms of supporting local economic activity, developing road crossings primarily for private motor vehicles is not the kind of connectivity that is most needed. TfL’s latest annual figures show strong upwards growth in rail and bus use, while car use is falling: “vehicle kilometres in London in 2014 were 9.5 per cent lower than in 2000 and this fall in road demand has been a consistent feature of the last decade. Between 1994 and 2014 there has been a net shift in mode share, at the trip level, of 13 percentage points away from the private car towards public transport, walking and cycling. This shift relates to all travel in London, whether by residents or non-residents.” A sustainable transport approach would be more likely to provide usable

¹⁶ David Metz: Travel in the twenty-first century <http://peakcar.org/travel-in-the-twenty-first-century/>

¹⁷ DfT Rail Freight Strategy October 2016 <https://www.gov.uk/government/publications/rail-freight-transport>

¹⁸ <https://www.gov.uk/government/speeches/the-paris-agreement-proves-that-the-transition-to-a-climate-neutral-and-climate-resilient-world-is-happening>

connectivity while making the growing residential centres on either side of the river more attractive places, strengthening the local economy.

Road-based connections will not provide the kind of regeneration most needed by the communities on either side of the river. As the mapping produced in the consultation shows, new road crossings will bring a significant increase in traffic volumes through these neighbourhoods, adding to noise pollution, air pollution and community severance.

One aim of the proposed Silvertown Tunnel is to assist access to employment. Road-based crossings will reinforce patterns of exclusion from work for those who do not have cars or do not drive particularly young people and the long-term unemployed. Research we conducted with the DfT found that encouraging sustainable travel helps increase the pool of labour for companies by increasing employers' access to non-car users in the workforce, leading to real benefits for employers, employees and the wider economy.¹⁹

There has been a significant increase in the amount of construction activity in east London and this has contributed to both current congestion and calls for future increases in road capacity. However it is important to note that the bulk of major construction projects that are due to take place in the areas served by the Silvertown Tunnel (including Crossharbour/Isle of Dogs regeneration, the Olympic Park, Crossrail, Canning Town, Silvertown, Custom House and Albert Docks regeneration to the north of the river and the redevelopment of north Greenwich, Greenwich Town Centre, and Deptford Creek to the south), are already completed, or will be largely completed before the proposed tunnel comes on stream in 2023.

Far from easing such building and regeneration projects, the impact of the congestion works for the proposed tunnel is likely to prolong disruption after these projects have been completed, continuing the adverse impact of building works on the surrounding communities, and delaying any benefit from these regeneration schemes.

9. Transportation and traffic

In our earlier submission (Appendix B) we noted that London's population growth does not result in equivalent traffic growth, and this needs to be factored into the modelling. In addition, further challenges to conventional modelling arise from the recent ClientEarth court case: the Department for Transport's current review into how Web TAG handles social and economic impacts: and recent studies criticising how the value of time is treated in modelling, with evidence that regular travellers will simply extend their travel area as travel time reduces rather than seek less time in transit.²⁰

We believe that there are a range of approaches to improve resilience at the existing Blackwall Tunnel and/or provide other options for crossing the Thames, which need to be fully explored before considering a new Silvertown Tunnel.

These could include:

- smart queueing and other demand management approaches
- new cross-river rail and/or light rail links, including proposed DLR and Overground cross-river extensions
- new cycling and walking crossings, including the proposed Rotherhithe bascule bridge
- investment in environmental and design improvements to existing roads to reduce air pollution and improve safety

¹⁹ Improving local transport helps the economy – experience from the Local Sustainable Transport Fund <http://www.bettertransport.org.uk/sites/default/files/research-files/Improving%20local%20transport%20helps%20the%20economy%20-%20experience%20from%20the%20LSTF.pdf>

²⁰ Prof. David Metz, Valuing Travel Time (July 2016) <http://peakcar.org/valuing-travel-time-savings-problems-with-the-paradigm/>

- improving provision of sustainable modes on the existing road network, encouraging modal shift and making better use of capacity
- investment in wharf capacity along the Thames to maximise water-based movement of freight
- joining up with other initiatives to shift distance freight to rail and manage on-road delivery times
- exploring a wider approach to demand management including road user charging / congestion charging not exclusively at new crossings.

We welcome the recent announcements focusing on extending the DLR and the London Overground rather than developing additional road crossings at Gallions and Belvedere. Providing new light-rail links across the river, with the option of parallel walking and cycling routes, would provide real regeneration benefits through direct connections from emerging neighbourhoods to London's employment centres that would be available to all. We do not believe this approach has been fully explored at Silvertown.

There is a great missed opportunity to provide more and better cycling capacity. The proposal for a bus shuttle service for cyclists and their bicycles is a thin gloss on what is effectively a new trunk road. The precedents are not happy. The similar shuttle service at Dartford is poorly publicised, poorly served and poorly used.²¹

We are not satisfied that full consideration has been given to maximising use of the Emirates cable car. This existing infrastructure has potential to meet many of the needs for local transport of people and light goods better than a new road tunnel. This would make better use of the significant capital investment already made in what is currently a woefully underused piece of infrastructure on a parallel route to the proposed Silvertown Tunnel.²² It also has potential to offer cyclists a route across the river that is at least as attractive as the bus shuttle proposed for the Silvertown Tunnel.

We are not satisfied that full consideration has been given to either a bus-only tunnel or to improved provision of bus routes through the existing Blackwall Tunnel, which can easily accommodate single decker buses. The recent introduction of a new Hopper bus fare (allowing TfL bus passengers to switch buses to complete their journey for a single fare rather than being charged separately for each bus used) allows dramatic reconfiguration of bus routes, for example with a dedicated shuttle through the Blackwall Tunnel, which would not have been an option at the time the Silvertown Planning application was submitted. The recent growth in bus usage resulting²³ also changes the assumptions on both the demand for such bus routes and the consequent reduction in car travel as buses become a more attractive option.

There is also great potential to reduce demand for road capacity through extending the MiniHolland approach to the boroughs to be served by the tunnel. In Waltham Forest, traffic levels in 12 key roads in the "village" area of Walthamstow fell by 56 per cent, or 10,000 fewer vehicles a day, following the introduction of strategic road closures, combined with improved walking and cycling provision. If such an approach were implemented in neighbourhoods around north and east Greenwich, north Woolwich, Silvertown and Canning Town, assuming similar impacts, this would significantly reduce demand for new capacity at the Silvertown Tunnel crossing point.

We also believe that there is potential to explore the introduction of a Workplace parking levy. This approach has already been implemented successfully by the city of Nottingham using powers under the 2000 Transport Act, and has shown a range of benefits including reduced traffic levels, investment in public transport, and early achievement of the city's carbon reduction targets, combined with growth in homes and jobs.²⁴ Piloting such a scheme in the Canary Wharf/Isle of Dogs central business district for example, could

²¹ Transport Focus <http://www.transportfocus.org.uk/research-publications/publications/dartford-crossing-cyclists-transport-focus-correspondence/>

²² Usage data for the Emirates Air Line 2015

https://www.whatdotheyknow.com/request/usage_data_for_the_emirates_air

²³ Ten million journeys made with Mayor's new 'Hopper' fare (October 2016)

<https://www.london.gov.uk/press-releases/mayoral/ten-million-journeys-made-with-hopper>

²⁴ Workplace Parking Levy briefing: Nottingham <http://www.cbththoughtleadership.org.uk/WPL-Briefing-Nottingham.pdf>

help manage demand on existing road-based river crossings while providing additional benefits in terms of air pollution, carbon reduction and better use of valuable employment land.

We believe the applicant should be directed not to progress the Silvertown Tunnel until these issues and alternatives, many of which have developed since the planning application was submitted, have been fully explored.

10. User charging

The issue of user charging is a key test for the viability of this project and the extent to which it can deliver its promises. It is notable that organisations that support the principle of the Tunnel, including London Borough of Newham and the Federation of Small Businesses, are opposed to a user charge being levied. Yet the applicant asserts – and we agree – that a charge is essential both to fund the project and to manage demand.

It is unclear whether in practice the added operational costs imposed by such a user charge on local businesses would compensate for the proposed gain in travel time from congestion relief. Given the experience of other schemes – notable Dartford – where any congestion relief is temporary but the user charges are permanent; this would seem to be an insuperable problem for the applicants to overcome.

We believe that further work needs to be done, as part of any further modelling required in response to the concerns raised by us and by others on the current modelling, on the appropriate level of user charge in tandem with the proposed ULEZ and supplementary congestion charge (t-charge) for the most polluting vehicles; with any proposed fiscal changes around fuel prices and/or Vehicle Excise Duty in the light of the ClientEarth court case; and the implications for demand from other new policy initiatives, including changes to other proposed river crossings announced by Transport for London at the start of this Inquiry.

There also needs to be testing of the charges for construction traffic in terms of placing greater burdens on the viability costs of affordable housing provision, contrary to the priority for affordable housing given by the London Plan (section 3.12) and borough plans.

We understand the calls from local communities to offer concessions for local users. The proposal to have tolls on the crossings – which we agree would be essential for demand management as well as funding – would increase the tendency for these to be primarily through routes for commercial traffic, with little or no local benefit.

However we believe there is an overwhelming environmental case – and a policy case to meet legal requirements on carbon reduction and air quality – to apply the user charge equally to all vehicles within a use class, with local and distance traffic treated the same. Any exemptions should be on the basis of vehicle fuel type and emissions, in line with the current congestion charge and emerging ULEZ charging regimes, with overall user charges set at a level that manages down demand in an area which already has more than its fair share of traffic, noise and pollution.

Examining Authority's written questions

We note that the majority of the questions are for the applicant.

GA2	We believe that this application should be considered in the context of the London Plan and NPPF, rather than the National Networks NPS. The application site falls fully within the London Plan area, and is being promoted by Transport for London and the Mayor of London under the same devolved powers. It would be inappropriate to consider this out of the London context by reference to the NNNPS.
AQ1, AQ2,	We believe that the 2021 baseline is not sufficient given that 2023 is the operational start of the scheme and that the applicant must aim to ensure that the scheme is air-quality neutral in line with

AQ9, AQ16	<p>both the London Plan and the wider requirements for significant intervention to meet legally binding air quality requirements, currently breached in London.</p> <p>We are not satisfied that the current proposals are appropriately assessed nor appropriately mitigated as a) we have an uncertain baseline given the real world driving emissions compared to lab tests and b) the proposed increase in overall traffic levels, leading to an inevitable increase in roadside emissions.</p>
SE3	<p>We note the apparent contradiction between levying a user charge and stimulating economic growth. We support a user charge on the basis of managing demand for environmental reasons as part of a wider sustainable transport policy, not only to cover construction and maintenance costs. However we agree with the Inspector that it is unclear whether in practice the added operational costs imposed by such a user charge on local businesses would compensate for the proposed (and probably temporary) gain in travel time from congestion relief. We urge against approving a Tunnel without a user charge given the likely knock on effects on congestion and air pollution from provision without demand management, which would be inherently unsustainable.</p>

November 2016

Bridget Fox
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.

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Appendix A – Representation on registering as an interested party, August 2016

The Silvertown Tunnel is promoted as responding to increasing population, meeting demand for river crossings and providing economic benefit. However, the scheme has serious problems that undermine this rationale.

New roads generate new traffic: increases in traffic, including heavy goods, would blight, not regenerate, parts of Greenwich, Newham and Tower Hamlets. Instead of 'relieving' the Blackwall Tunnel, the approach roads to the south would be shared, creating increased demand on existing roads, relocating congestion rather than reducing it, while increasing noise and air pollution.

Air pollution is already at lethal and illegal levels: over 90% of modern vehicles on the road emit more pollution than the standard lab tests record. Even a marginal increase in traffic levels will add to roadside pollution. The Mayor's ULEZ proposals, although welcome, will charge, not exclude, the most polluting traffic.

The proposed tunnel is designed to accommodate HGVs in both directions, incentivising larger, more dangerous and more polluting vehicles, to come into areas that already suffer from noise, air pollution and congestion.

There is no economic or social benefit to the Greenwich peninsula, which is in need of new public transport to serve 10,000 new homes planned for the area. There is no benefit to the communities in North Woolwich, Silvertown and Canning Town: existing car ownership levels are relatively low, and the new homes being built there are largely car-free, benefitting from access to the DLR, Crossrail and the Canning Town interchange. Toll costs will adversely impact local small businesses making deliveries (e.g. florists): tolls will add to local construction costs, undermining the viability of affordable housing in new developments.

The main beneficiary of the tunnel is likely to be commercial traffic servicing businesses in the Royal Docks, Isle of Dogs and Canary Wharf. Exploring options for smarter last mile deliveries, following the expertise in Greenwich, and for workplace parking levies, would be a better and more sustainable option, in tune with emerging transport policy.

There appears to have been no serious consideration of alternatives, including, but not limited to, a public transport only connection; provision for cycling routes; a package of demand management measures on existing roads, including smart road user charges, as part of the proposed London ULEZ.

There is also the cost and impact of removing the spoil from the tunnels and where it would be dumped, with removal adding to the danger and pollution on local roads.

The scheme is projected to cost £1bn, at a time when TfL is facing massive cost pressures from loss of central Government funding, delivering a fares freeze and meeting growing demands on public transport. We are not satisfied that this scheme represents value for money. The money could be much better spent on providing pedestrian and cycling links between the Greenwich peninsula and Canary Wharf, among other sustainable transport infrastructure.

We believe the combination of these factors - little or no local economic benefit, significant adverse environmental impacts, and high cost - combine to undermine the case for the Silvertown Tunnel.

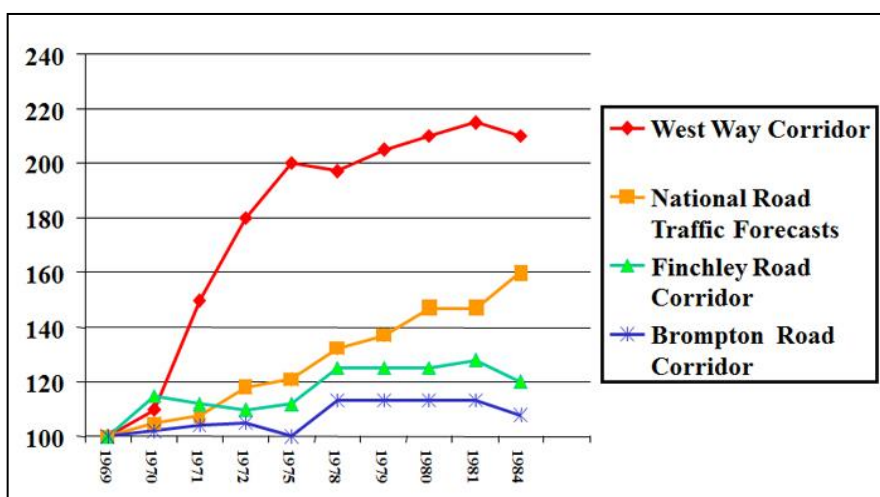
Appendix B - Response to the November 2015 TfL consultation on the proposed Silvertown Tunnel scheme

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.

The principle of 'induced traffic' has been demonstrated repeatedly since 1925,²⁵ 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.²⁶ 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.²⁷



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

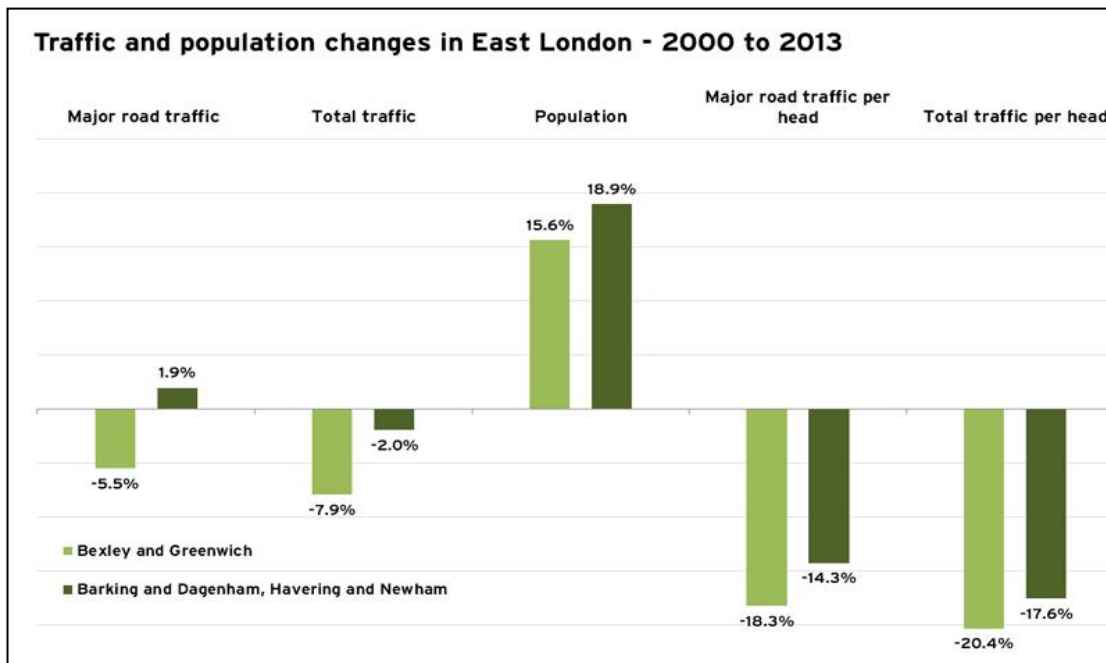
Even the expected increase in population of the East London boroughs in the coming years is not a reason to add more road space. As the chart below shows, since 2000, the boroughs north and south of the Thames in this area have seen rapid population growth without a corresponding increase in traffic – traffic per head has dropped between 14 and 20 percent in this period.²⁸

²⁵ 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>

²⁶ 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/wtp05.2.pdf>

²⁷ 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>

²⁸ 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



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.

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.²⁹ 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 legislation³⁰ – 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,³¹ and the 2014 European Court of Justice judgment that the

²⁹ 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%99likely-decades%E2%80%99-due-failing-tests>

³⁰ Directive 2008/50/EC http://ec.europa.eu/environment/air/quality/legislation/existing_leg.htm

³¹ News about Supreme Court decision with links to summary and full judgment <http://www.healthyair.org.uk/clientearth-triumph-in-the-supreme-court/>

government must act to bring pollution within legal limits 'as soon as possible'³² – 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.

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.

³² 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>