

Our ref: MGLA071019-4151

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Date:

Thank you for writing to me about the Silvertown Tunnel. I know my Deputy Mayor for Transport, Heidi Alexander, has written to you on my behalf on a number of occasions and has also met with you to discuss your concerns. I'd like to take this opportunity to reiterate my views on the scheme, and also to respond to some key matters you raise in your most recent letters of 4 October and 7 November.

I am committed to reducing car dominance, improving air quality and addressing the climate emergency. The current situation at the Blackwall Tunnel cannot continue as it fundamentally undermines these goals. The regular congestion and tailbacks that occur when the tunnel closes means the approach roads are some of the most polluted in London. ~~Meanwhile~~ This problem is only exacerbated during the regular incidents that occur at the Blackwall Tunnel and this, the lack of resilience means Transport for London (TfL) is not able to run a reliable cross-river bus service, which would encourage people to travel by more sustainable means. Building the Silvertown Tunnel with an associated user charge, and introducing a new user charge at Blackwall, is the best solution to ~~these~~ problems.

I reject the assertion that the information presented by TfL through the public consultation and to the Planning Inspectorate was incorrect and misleading or known to be false.

~~Detailed comparison of assessed scheme v Blackwall Tolls, wider pricing to fully congest Blackwall, single bore option:~~

TfL has undertaken a comprehensive assessment of options to address these problems and my Deputy Mayor for Transport and TfL have explained this process to you. Options assessment was a key consideration in the Development Consent Order process, is thoroughly explained in TfL's submissions to the Planning Inspectorate, and was recognised in the Secretary of State's decision letter which states:

"The Secretary of State notes that while concerns were raised from some interested parties... there was no challenge to the fact that there are existing problems in relation to the Blackwall Tunnel and its approaches that demonstrate that there is a need to be addressed. The Secretary of State agrees with the Panel at PR 4.5.23 that there are no reasons to disagree with the objectives set by the Applicant for identifying a solution.

The Secretary of State notes the options appraised and alternatives canvassed (PR 4.6.12-35) and he agrees with the Panel that there has been sufficient assessment of alternatives"

Comment [a1]: I thought best to keep this high level but I think we have the info if you want to go into more detail on specific options, some are explained below

[Revenue from user charging will initially be used to pay off the cost of building the Silvertown Tunnel but you are wrong to suggest 'the success of the scheme depends on TfL maintaining existing levels of heavy motor traffic across the river, in order to pay off the construction loan'. The Charging Policy makes explicitly clear that TfL's ability to repay is a secondary consideration to traffic, environmental and economic factors. That being said, TfL quickly anticipates a surplus from the user charging revenue after a relatively short period which, in addition to paying the costs of building the tunnel, would be reinvested in the transport network.](#)

[Spending of toll/pricing income on other infra or PT.](#)

[TfL failure to give economic value to carbon reductions or local air pollution improvements in comparison of schemes.](#)

In your letter of 4 October, you ask detailed questions about the potential to introduce a user charge at the Blackwall Tunnel. This option, including not constructing a tunnel at Silvertown, has been explored in detail. In a scenario where the same user charges were introduced at Blackwall as are assumed for the Silvertown Tunnel 'assessed case', there would be increased demand at adjacent, less suitable crossings such as the Woolwich Ferry and Rotherhithe Tunnel, and increased congestion and air quality issues across the network. Further increasing the charge to reduce congestion at the Blackwall corridor to a level similar to that expected for the Silvertown Tunnel scheme, coupled with the fact that no new crossing would be provided, would mean a significant proportion of traffic would re-route from Blackwall. This would bring even higher levels of congestion and worsened air quality to other river crossings and elsewhere on the network.

Furthermore, a Blackwall-only charge option wouldn't address the inherent constraints associated with the design of the current crossing. This design means that the tunnel experiences a disproportionately higher number of incidents and closures compared to other major UK highway tunnels. It would not allow TfL to run double deck buses that will help make a step change in public transport provision.

In response to your assertion that traffic would be displaced onto other roads such as the A102, TfL's modelling has detailed that overall there is a significant reduction in travel time (i.e. congestion), particularly in the peaks, as a result of the scheme.

As Heidi outlined in her letter to you of 20 September, London's 1.5C trajectory takes the Silvertown Tunnel into consideration as it is based on modelling of London's entire transport system. London's carbon reduction pathway is in line with the Committee on Climate Change's pathway and the Intergovernmental Panel on Climate Change's trajectories consistent with a limited probability of overshooting 1.5C warming. The independent assessment of our climate action plan is available on our website, along with the letter from C40 confirming that London has developed a Paris Agreement compatible climate action plan. These documents can be accessed on the following webpage, under the heading "Related documents", and listed as Appendix 6 (Final Climate Action Plan Assessment) and Appendix 7 (C40 Climate Action Plan Letter): <https://www.london.gov.uk/what-we-do/environment/london-environment-strategy>

Transport emissions in the 1.5C pathway fall firstly from modal shift as it assumes 80 per cent of trips are made by foot, cycle or public transport by 2041. The modelling by Element Energy then assessed how the remaining road transport could be moved to either electric or hydrogen energy supply. London's zero carbon pathway only assumes hydrogen is used for certain transport applications such as Heavy Goods Vehicles that it may not be possible to electrify. The pathway is not based on the

Comment [a2]: Suggest we are not drawn on this. The Business Case does make an economic valuation of air quality improvements but it is insignificant relative to the economic value of journey times etc. This is really a question about DfT's TAG rather than this specific scheme

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scenario that is heavily reliant on hydrogen given our shared concern over the future widespread availability of low carbon hydrogen.

Instead, London's zero carbon pathway relies heavily on electric vehicles. They will result in significant carbon savings, not only due to their increased efficiency (compared to petrol and diesel vehicles) but as they run on increasingly low carbon electricity. Even with current electricity grid intensity and considering the embodied carbon associated with their production, electric vehicles already save significant amounts of carbon over their lifetime. This benefit will grow in future as the grid decarbonises further.

~~Carbon emission targets in future—would these undermine business case for tunnel and mechanism for repayment?~~

~~While the Silvertown Tunnel proposals have been fully considered in our current plans, I can also assure you that the scheme has the flexibility to co-exist with any subsequent developments, such as new proposals for regulation or wider road user charging. How exactly the Silvertown Tunnel and its user charge is effected clearly depends on the specific objectives and impacts of any new policy or development, but the Charging Policies and Procedures provide flexibility to cope with this. In setting and varying the user charge, TfL is required to re-assess impacts taking any contextual developments into account, and make changes to satisfy the environmental, economic and other objectives set out within the DCO. Again it's important to note that TfL's ability to repay construction costs is a secondary consideration in the Charging Policy.~~

~~Ability of future Mayor to remove or reduce the toll and how this would impact AQ.~~

~~I have repeatedly explained how the setting and varying of the user charge is a decision for the TfL board following substantial analysis and consultation by TfL. It must all be in compliance with the Charging Policy which will ensure the commitments in terms of traffic, environmental and economic impacts are met. Amending the Charging Policy is a decision for the Mayor but it is certainly not a political decision. Any Mayor would need to have regard for relevant policy at the time, the DCO assessments and would need to consult on any proposals having regard for the views of Londoners. Any breach of a DCO is in fact a criminal offence.~~

In concluding your letter, you say that you believe public policy should be made on the basis of the best possible analysis of value for money, air quality and carbon emissions. I can assure you that this has been the case for the Silvertown scheme, and I would not be endorsing it otherwise. I know you hold very strong views on the scheme, and I share your passion for protecting our environment for future generations. However, unless there are substantively new and different points you wish to raise, I feel additional correspondence on this issue is unlikely to be productive.

Thank you again for writing to me.

Yours sincerely,

Sadiq Khan
Mayor of London

MAYOR'S OFFICE ADVICE NOTES

(TO BE COMPLETED BY DRAFTING OFFICER AND UPLOADED WITH DRAFT FOR MAYOR TO SIGN)

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Background/Comments:

Add additional information here: XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

If correspondence is urgent:

Provide reason(s) for urgency and specify if correspondence needs to be sent out by a certain date (if different to Write On 20-day deadline).

