

London

August 15 2019

Dear Mayor Khan,

We would like to commend you on the important step of declaring a climate emergency, and on your decision to move forward with the wider ULEZ to help reduce local air pollution in London. It is heartening to have a London Mayor who wants to lead on these crucial issues.

We are concerned, however, that allowing TfL to build the Silvertown Tunnel would threaten much of your good work on improving air quality, and position London's carbon emissions on a pathway that is not consistent with the Paris agreement and contributes directly to climate breakdown. We are a cross-party coalition, and we are not opposing the Tunnel to make a political point, but because we believe both the environmental case and the economic case for the project are deeply flawed.

The business case for building the tunnel, which mostly comes from alleviating congestion, rests on a model that assumes that private vehicle trips slightly increase over the coming years, and that carbon emissions decline only slightly - far less than demanded by your London Environment Strategy. Even keeping to the carbon budget in the Strategy would breach London's IPCC 1.5 degree carbon budget in 8 years, according to recent work supported by climate scientists at Manchester Tyndall, thus removing any chance of London meeting its share of the Paris agreement.

We recognise that the Mayor does not have control over many of the policy decisions affecting London's carbon emissions. You do, however, have a great deal of control over surface transport - which, in 2017, the latest DBEIS figures show, comprises 27% of London's carbon footprint. A Paris-aligned carbon budget requires cuts at greater than 12% a year. We believe that it is possible for you to act to reduce surface transport emissions at this rate over the next few years, without assistance from Westminster. In particular, we know from TfL's own figures that nearly 5 million private vehicle trips every day could be moved to cleaner and less carbon-intensive modes. Developing and implementing a clear pathway to zero emissions for TfL surface transport would also help achieve your air quality and road safety goals.

We think that the most effective way to do this will be London-wide smart road pricing, as recommended by both the Centre for London, and TfL's own 2017 report on 'Understanding & Managing Congestion in London'. Smart road pricing will allow you to manage traffic levels across the city in order to balance carbon reduction, congestion, local pollution and social justice outcomes - and to gain from an income stream that will fund new infrastructure (such as DLR Eltham extension) to enable a swift modal shift to public transport, cycling and walking. Such a scheme was never included in any assessment of alternative measures to the Tunnel.

We believe that you could start to implement smart road pricing as early as 2021, if you take advantage of the camera enforcement system that is being put in place to manage the expanded ULEZ.

If you do this, or pending its implementation use any other pricing strategy at Blackwall, you will also be able to solve the chronic congestion and pollution issues at the tunnel mouths, reduce blockages, and improve cross-river bus services, by adjusting the price to reduce traffic, and preventing over-height vehicles registering

for the charge. And you can do this several years earlier than with the Silvertown scheme, and without spending £1bn on new road capacity that, in a climate emergency, we will never be able to use.

Furthermore, the Silvertown scheme, even in the best case scenario, and according to TfL's own figures, spends £1bn of Londoners' money to increase overall traffic, carbon emissions, and air pollution. In the worst case, it makes congestion and pollution much much worse across an already heavily polluted area where some of London's poorer populations live. Local schools are very concerned - you will recall our earlier letter signed by 15 head teachers. Pricing Blackwall, on the other hand, will reduce traffic, emissions, and pollution. And it will provide an income stream that can be used to further reduce carbon emissions and local pollution. Local children need these changes to start now - they don't have years to wait.

We note that TfL have suspended contract negotiations due to legal moves by a bidder. We would ask that you take advantage of this hiatus to pause the scheme and review a number of related aspects:

(a) The recent Aether report reviewed Air Pollution exposure in London against the LES. Now two similar steps need to be taken on carbon emissions. First, the LES and the MTS need to be reviewed against delivering a Paris-aligned carbon budget that is consistent with your Climate Emergency declaration. Second, TfL policy needs to be reviewed, with and without Silvertown tunnel, against the revised carbon budgets in the LES and MTS. The bottom line must be that TfL policy does not undermine London staying within its share of the IPCC global carbon budget for limiting climate heating to 1.5 degrees centigrade above pre-industrial levels (ie: the Paris-aligned budget), as supported by your recent climate emergency declaration.

(b) TfL should be asked to review the business case and traffic forecasts for the Silvertown Tunnel, to take account of the climate emergency and the London-wide actions needed to achieve our carbon reduction goals. This should also include an assessment of the traffic, carbon, air pollution and economic effects of using price mechanisms to fully de-congest the Blackwall Tunnel without building Silvertown Tunnel, and of a London-wide smart charging scheme.

(c) TfL should be asked for new air quality assessments that show clearly how air quality varies if future Mayors reduce or abolish the Silvertown and Blackwall tolls, as they have authority to do - and that include the effects of new land use (e.g. the two new planned freight depots on each side of the tunnel).

We note that the real effects of global heating are consistently overshooting the effects predicted in models. There is a serious risk of dangerous feedback loops. We have very little time. It is essential that those with control over policy right now take the most precautionary path in terms of climate risk. This may mean taking action that looks politically somewhat radical. We hope that you will be brave enough to show climate leadership for London and we will, of course, offer you our full support if you do.

If you do take action, you will not be alone. In the last two months, the Labour administration in Wales has cancelled the M4 'relief' road, Marseilles has cancelled the expansion of Marignane Airport, and Hereford Council has paused a bypass and link road. We need far more radical change, but calling a halt on new projects that will lock in carbon emissions far into the future is a vital first step.

Please find attached a detailed briefing note from SSTC on the Silvertown scheme. We are of course happy to meet you and discuss these points further, if that is useful.

Yours,

Stop the Silvertown Tunnel Coalition (██████████, Coordinator)

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