

From: Pardoe John
Sent: 17 September 2019 14:06
To: Parr Billy
Subject: Further challenge to scheme
Attachments: Letter to Heidi Alexander 7 August 2019.pdf

Hi Billy

We've had another letter with a few questions that we are looking to answer. I've highlighted the main bits at the base of this email and attached the letter. Perhaps you could assist with answering the point 2 highlighted in yellow below?

2. A review of 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 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.

I will expand on the point that just installing road pricing does not assist resilience or public transport.

Is their statement below untrue and TfL have "*modelled in detail the very feasible option of fully de-congesting Blackwall either directly with a toll*" ? I note your previous response to me Fri 05/07/2019 17:11, you confirmed that Blackwall only charging was dealt with in the Traffic Forecasting Report.

Secondly, it is clear from what we heard in the meeting and from our conversation with David Rowe afterwards that TfL has never modelled in detail the very feasible option of fully de-congesting Blackwall either directly with a toll, or with more widespread pricing scheme such as suggested above - and has never done a cost-benefit comparison of this option - which is clearly a very credible alternative - with the Silvertown project. If they had done this, the cost/benefit figures we have seen indicate that they would likely have found that 'just pricing to remove congestion' achieves nearly all the de-congestion and public transport benefits of the Silvertown scheme (about £958m worth of the overall £1216m) several years before the Silvertown scheme would - as well as some of the reliability benefits of Silvertown (because removing queues improves reliability, and because a pricing scheme can be used to exclude over-height vehicles).

I also note your response to me Fri 05/07/2019 17:11, you confirmed that we have already examined charging at Blackwall combined with a 'public transport max' package that included a number of currently unfunded schemes, such as Crossrail 2, Bakerloo line extension and extensions to the DLR and Overground, but again this was nowhere near as effective as the Silvertown Tunnel option.

For the London Wide smart charging system part of the question I will be advising:

The affect of a London-wide road user charging (RUC) scheme on the user charges for Silvertown and Blackwall tunnels depends on the specific objectives of that scheme. However, our Charging Policies and Procedures provide flexibility to cope with this and are linked to specific traffic, environmental and other objectives of the Silvertown scheme. Any future RUC scheme would need to address the obligations of the DCO and specifically the Charging Policies and Procedures which would continue to stand regardless of any wider RUC scheme. I've set out a couple of examples which might help:

- A wider RUC scheme might be designed to deliver further improvements to air quality but achieve this through major changes to the fleet rather than reducing demand. In this scenario we would look to maintain general user charge levels at Silvertown / Blackwall, but may remove certain exemptions for low-emission vehicles so as to reduce congestion, secure the reliability of the bus network and so meet other objectives of the Silvertown scheme.

- A wider RUC scheme might be designed to reduce demand on the road network across a wider area of London, including at Silvertown/Blackwall. This could result in reduced traffic at Blackwall/Silvertown but might encourage greater levels of specific vehicle classes due to a more efficient network e.g. HGVs. In this case we would look to maintain higher charges for HGV's or other relevant vehicle classes to continue to secure our beneficial impacts on air quality.

Regardless of a future RUC scheme, we will be required to assess its impacts and make changes to the Blackwall/Silvertown charges to ensuring we are meeting the environmental, economic and other objectives set out within the DCO.

Regards

John

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Thirdly - though we did not have time to get to this point in the meeting, we would re-iterate that all the traffic, air pollution, and congestion forecasts for Silvertown are based on the level of the toll - and that the level of the toll is entirely under control of future Mayors - who, in a worst case scenario can remove it entirely. We think, therefore, that everyone affected by or promoting this scheme should be allowed to see the worst-case pollution scenario (which can be calculated from the worst-case no-charge traffic scenario on pages 57-63 of the traffic forecast) before the project goes ahead.

So we are asking for the following, before you allow TfL to sign the contract for this scheme:

1. A new carbon impact assessment of the whole TfL transport policy (with/without Silvertown tunnel) based on not breaching London's share of the IPCC global carbon budget for limiting climate heating to 1.5 degrees centigrade above pre-industrial levels. This approach is supported by the Mayor's recent climate emergency declaration.
2. A review of 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 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.
3. 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 i.e. the two new planned freight depots on each side of the tunnel.