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London

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August 7th 2019

Dear Heidi,

Thanks very much for taking the time to meet us on Friday.

We would like to emphasise that the Stop the Silvertown Tunnel Coalition has no political affiliation. We are a cross-party coalition, and our only purpose is to ensure that you and the Mayor understand exactly why the Silvertown Tunnel is a massive environmental and economic mistake.

We would like to re-emphasise three key points, relating to the action that is necessary to mitigate the climate emergency, to the value for money of the project, and to the air quality projections.

First, we were deeply disappointed to hear that despite declaring a climate emergency, the Mayor is not yet even contemplating any policies to reduce motor vehicle traffic in ways that might lead the city on to the IPCC 1.5 degree pathway. On July 1st, the Mayor warned of the threat of "climate delayers"; yet, the Mayor himself will be delaying action on climate change if he signs the Silvertown Tunnel contract.

There is a fixed amount of CO₂ that can be emitted globally to hold global over-heating to below 1.5 degrees. This is the global carbon budget and the IPCC calculate it at 420 GtCO₂eq. The current carbon budgets in the Mayor's Environmental Strategy will use up London's share of this budget somewhere between 2024 and 2030, most likely closer to the earlier date. The carbon budgets in the Environmental Strategy have been made seriously out-of-date by the IPCC 1.5 degree report, and the strategy needs urgent review given the Climate Emergency declaration: much greater emissions cuts are needed, and we can advise in further detail on this point. It is very concerning that the Silvertown Tunnel Environmental statement figures make no attempt to align even with the out-dated Mayor's Environmental Strategy, let alone the IPCC, and essentially flat-line transport emissions out to 2036: this is an extremely dangerous lack of action ("delaying"). Nevertheless, we are optimistic that an administration (whether led by Sadiq Khan or another Mayor) will recognise the seriousness of the situation, and make appropriate changes to policy and carbon budgets, in the very near future. So we think that it is necessary, before signing the Silvertown contract, that you make a full analysis of the consequences of such a policy on the business case and repayment schedule for the Silvertown project.

At the meeting, the possible role of electric vehicles, the hydrogen economy and negative emissions technologies were briefly touched upon by Shirley with respect to the Environmental Strategy. We would like to point out that in the timescales available to act on Climate Emergency ie: before 2030, these technical proposals are not of help. With respect to electric cars, there are many downsides including: significant embodied carbon emissions in their production which front-loads an emissions cost just when we need to radically reduce emissions; reliance on a predominantly carbon-based electricity grid and analysis shows currently their in-use emissions are no better than 50% of internal combustion engine (ICE) vehicles; significant demand to the grid which would slow the overall decarbonisation of the energy supply; particulate air pollution from brakes and tyres; 1:1 replacement of ICE vehicles do not reduce congestion; a future EV market at the level of ICE vehicles today may be unachievable, anyway, due to limits of resources like lithium; research shows fleet turnover takes much longer than people think - 20

years with 100% market share; and uptake is slower than Government policy - current UK market share was 2.5% against 3.4% target for 2018.

Negative emission technologies (NETs) propose global removal of carbon from the atmosphere. Generally, they have huge technical challenges and are unproven to scale. The one most studied so far, Bionenergy with Carbon Capture and Storage (BECCS) also has critical environmental risks including to water use, land required and biodiversity that argue against its roll-out at scale. In any case, very significant technical, economic, financing and governance challenges make large scale deployment of NETs a long time off, and they cannot be seriously considered for carbon budgeting for London becoming net-zero by 2030 or before.

It therefore seems to us that any serious policy aimed at hitting IPCC 1.5 degree targets on carbon reduction will necessarily involve sharp and swift reductions in the number of motor vehicles (electric or ICE) operating on London's roads. Clearly the most efficient and effective way to achieve this is smart road pricing - which allows carbon reduction, local pollution and congestion objectives to be aligned with social justice goals - and gives an income stream that can help simultaneously fund better public transport and easier and safer cycling and walking.

You mentioned the technical difficulties of implementing the wider ULEZ, which we appreciate. However, once TfL have solved these difficulties, they will also have put in place an enforcement system that can easily be adapted to enforce smart road pricing instead. Rather than checking via a database that vehicles identified by the system have paid the ULEZ fee, the system can instead check that there is a mobile device inside the vehicle, and running a GPS-based smart charging app that is registered to that vehicle. So assuming the wider ULEZ is on track for 2021, there are no significant technological barriers to replacing it with a smart charging scheme from the same date. (And, as you know, there has been some resistance to ULEZ on social justice grounds. Smart charging would allow these effects to be mitigated.)

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).

If this is true, it is in fact very good news. If the modelling works out, TfL can get nearly all the suggested benefits of the Silvertown project (including congestion, pollution, public transport, and some reliability benefits) several years earlier, without spending £1bn on construction, and without producing the extra 153,000 tonnes carbon emissions associated with building the tunnel. And they will get a new income stream, as soon as they implement the tolling, that can be used to re-start emission-reducing projects that have stalled through lack of money, as well as alleviating any social justice issues that pricing might bring.

Given that a pricing-only scheme that fully decongests Blackwall would clearly represent much better value for money for the SE London residents who are being asked to pay for it than the tunnel, we hope you will ask TfL to do a comprehensive analysis of this option before moving ahead on any alternatives.

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.

We would also note that, even in the best scenario, while this scheme moves pollution around, it does not reduce it significantly, and in some places it makes it worse, which is not acceptable. Given new knowledge about the health effects of bad air, and the fact that reducing air pollution is now a priority of the Mayor's, we think that the option of a pricing-only scheme that uses toll income to support new infrastructure to sharply reduce air pollution across the entire area, rather than to build a tunnel, should be carefully considered.

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.

Finally, we note the strong and well-considered opposition to the scheme from many of the Mayor's natural allies and Labour colleagues, including Hackney and Newham councils (who are loudly protesting the Mayor's imposition of a massive new road that will nullify the effects of the environmental plans he himself has asked them to put together), Southwark and Lewisham councils, all 3 Greenwich Labour CLPs, London Living Streets, London Cycle Campaign, Mums for Lungs, the Ella Roberta Foundation, Clean Air for London, and many more. We also note that support for the Tunnel, as far as we can tell, has almost entirely evaporated.

We hope that you will pause the scheme, put in motion the analyses above, and, depending on their results, consider alternative plans.

With best wishes,



on behalf of Stop The Silvertown Tunnel Coalition