



Darren Johnson AM

City Hall  
The Queen's Walk  
London SE1 2AA  
Switchboard: 020 7983 4000  
Minicom: 020 7983 4458  
Web: [www.london.gov.uk](http://www.london.gov.uk)

**Our ref:** DJ5429

**Your ref:**

**Date:** 25<sup>th</sup> November 2015

River Crossings Consultation,  
Via email to [rivercrossings@tfl.gov.uk](mailto:rivercrossings@tfl.gov.uk)

Dear Sir/Madam,

### **Silvertown Tunnel - RESPONSE TO CONSULTATION**

As a member of the London Assembly I am writing to formally respond to Transport for London's (TfL) consultation on the proposed new road river crossing at Silvertown.

I shall respond to Transport for London's consultation questions in turn.

**Do you support the Silvertown Tunnel scheme as a means to address congestion and closures at the Blackwall Tunnel, and support future growth in London? If you have any comments about our intention to apply for consent to build and operate the Silvertown Tunnel scheme, please let us know in the space below.**

TfL's entire case for the Silvertown Tunnel is based on flawed assumptions. TfL's traffic baseline a) assumes a 10% growth in trip-making (across all modes including by private car, partly due to estimates of where the new jobs will be located) b) an increase in demand for the Blackwall Tunnel from 104% in 2012 to 142% in the reference case for 2021 (no Silvertown Tunnel built).

TfL's model assumes that people will idly sit in traffic jams, unable to enter the Blackwall tunnel, and will not find a better way to cross the river or stop crossing the river at all. As we have seen on London's buses as journey time reliability worsens across the road network as congestion grows, Londoners find a new way of getting around if the existing way is blocked. This year TfL expects a £55m shortfall in bus fares revenue (Q1 2015/15 quarterly performance report), precisely because people are stopping using buses. Drivers would do likewise.

TfL refer to their reference cases for 2021, 2031 and 2041 for their River Crossings Highway Assessment Model (RXHAM) area as 'do minimum' cases and state 'the benefits of the scheme are not dependent on any assumed growth in traffic volumes in future years'.

TfL's reference cases should not be based on 'do minimum' principles. London's transport authority under the direction of the London Mayor should be actively taking steps to reduce traffic as London faces congestion and pollution crises. In the next iteration of the transport assessment, TfL state that they will be altering their baseline but this should already have been done. TfL have locked into future planning a series of assumptions about unsustainable increases in motor traffic rather than traffic decreases and this 'predict and provide' approach underpins the entire scheme.

TfL projections for traffic increases are very high when compared to the actual experience of the last fifteen years. Given the long track record of the Department for Transport (DfT) and TfL making inaccurate projections, I would like to see TfL publish the modelled impact of the river crossings on current levels of traffic. It may well be that there would be more dramatic increases in traffic levels on key roads and less falls on other roads, as a result of having a lower baseline of traffic in east London. This might well have impacted on how people living in the area perceive the TfL case for the crossings.

I support calls for an independent assessment of the air pollution impact and traffic modelling. I believe that funding should be provided to local community groups to enable this to happen, in a similar way to the funding given to local groups ahead of the Thames Gateway Bridge public inquiry.

Responding to a formal question (2015/3236) I tabled at the October 2015 session of Mayor's Question Time, the Mayor stated that 'the overall daily traffic flows are expected to show little change if the Silvertown Tunnel scheme is implemented – at around 48,000 vehicles in each direction.'

Whilst I am very sceptical about the accuracy of these predictions, it doesn't make any sense to spend nearly a billion pounds on an additional road that the Mayor argues will be used by even fewer drivers than the existing one. If the Mayor wants to deal with traffic jams and excess demand he should toll the Blackwall tunnel now, use the money to invest in public transport and see if that solves the congestion problem.

**Connections to the existing road network: We have described the proposed design of new junctions to link the tunnel to the existing road network. If you have any comments on the design of these new junctions please let us know in the space below.**

Junction changes are only planned in the vicinity of the Silvertown Tunnel itself, despite figures 7-16 and 7-17 replicated later in my consultation response showing that the new tunnel would increase traffic flows at a number of key junctions further afield.

Concerns about traffic impacts on roads further afield have led to Lewisham and Hackney councils passing motions against the scheme.

TfL's proposal to lengthen the Tidal Basin Roundabout would worsen air quality here, an area where many homes are to be constructed.

TfL's plan to widen the Blackwall Tunnel Southern Approach neglects the issue of extra traffic that will seek to pass through junctions on the A102 and A2 further south. The Sun in the Sands roundabout is one such example.

**Construction impacts: Our proposals for constructing the Silvertown Tunnel are at an early stage, although we have included our initial thoughts on what temporary road closures and diversions might be necessary. If you have any comments on our construction proposals and their potential impacts, please let us know in the space below.**

The potential construction impacts of this scheme are severe and would affect many local residents negatively.

TfL expects up to 226,800 one-way lorry movements over the four year construction period (see Table 6-3, page 150 of preliminary transport assessment). While TfL admit this would necessitate suitable mitigation measures, no details of such measures have been provided. With such huge disruption anticipated, this lack of planning is not acceptable.

Leamouth Road and Lower Lea Crossing would see a 36.5% and 50% increase in HGV traffic respectively. This will cause an increase in danger for pedestrians and cyclists as well as an increase in vehicle emissions in an already polluted area. Local residents are unlikely to be aware that their neighbourhoods are going to become a conduit for heavy trucks as this information again is buried within complex consultation documents. It should have been displayed prominently in all affected areas, on lamp posts and notice boards for public scrutiny.

The A102 will be deluged by 179 HGV movements in the PM peak and 381 HGV movements in the AM peak as part of this scheme. This will change the nature of the traffic on this road to make it more threatening and will have a hugely negative effect on the public realm, serving to discourage walking and cycling.

280 car parking spaces will be provided for labourers and engineers working on the site. This does nothing to encourage employees to travel to the work site by sustainable means. At the very least a shuttle service should be set up from a public transport hub rather than individual employees arriving at work by private vehicle.

The walking diversion plans (p169) are inadequate for Londoners with mobility issues and could leave some unable to get around the local area without having to cross roads at dangerous locations.

**User charges: As part of our plans for the new Silvertown Tunnel we are proposing to apply a user charge to both the existing Blackwall Tunnel and the proposed new tunnel in order to manage traffic demand and pay for the new tunnel to be built. The level of the charge would be set closer to the time that the Silvertown Tunnel opens, taking account of the conditions that exist at that time. Further details are set out in the 'Preliminary Charging Report', which is available to download. If you have any comments on our proposals for user charging please let us know in the space below.**

If the Mayor wants to deal with traffic jams and excess demand he should toll the Blackwall tunnel now, use the money to invest in public transport and see if that solves the congestion problem.

TfL's decision to renege on its earlier plan to scrap the popular free Woolwich ferry was at least in part because this is a popular toll-free service and people do not want to pay to cross the river.

Introducing tolls on the Silvertown tunnel, Blackwall Tunnel and eventually the Woolwich ferry as TfL intends to would mean east Londoners were liable to pay to cross the river whilst all west London crossings remained free. Such a move would be to disadvantage east London, the very area the Silvertown Tunnel is supposed to help grow. Small businesses in particular would find it harder to afford the charge as opposed to large companies who could factor it into their operating costs more easily. The charge would deter businesses from setting up in east London, if they had a free choice of whether to set up in west or east London.

The preliminary charging report (PCR) contains insufficient evidence about who would be able to approve a change to the user charge amount. TfL's December 2012 charging options assessment paper acknowledges that charge-setting is an inherently political process. As such, a future Mayor could significantly reduce the toll for reasons of political expedience.

Section 4.32 states 'However charges sufficient to reduce demand from around 150% of capacity to a level within capacity would be punitive and are unlikely to be politically feasible.' There is no further analysis of the effect that higher levels of charge could have on congestion.

The potential for vehicles to drive slowly or seek out places to wait before a cheaper tolling period begins has not been covered in the consultation material. No analysis of drivers' propensity to do this close to other river crossings has been carried out. If this phenomenon developed, it would affect the resilience of local roads.

It will be cheaper to drive through the tunnel than take public transport outside of peak times. A range of short DLR journeys and a bus trip will cost £1.50 whilst using either tunnel will cost just £1.00. Cyclists or pedestrians using the Emirates Air Line will be charged £3.40 to cross the river. To deter unnecessary vehicles trips, TfL needs to increase the proposed user charges so that public transport becomes a more attractive option than driving.

**Environmental effects: We have described the likely environmental effects of the Silvertown Tunnel scheme and described some mitigating measures we would take. Further details are set out in the 'Preliminary Environmental Information Report' (PEIR), which is available to download. If you have any comments on the likely environmental effects of the scheme and the proposed mitigation measures, or on any of the information set out in the PEIR, please let us know in the space below.**

#### Impact of Silvertown Tunnel on air quality

Insufficient analysis of the potential environmental impacts of the Silvertown Tunnel has been undertaken by TfL at this crucial stage. Had the findings from a full environmental impact assessment been provided at this stage, it is a very real possibility that the public would find the environmental and health impacts of the Silvertown Tunnel unacceptable and respond to this final stage of consultation voicing their disapproval for the entire project. TfL's failure to carry out a more detailed analysis at this stage and publish the results misleads the public.

The data used by the London Air Quality Management (LAQM) model currently assumes a near-uniform increase of between +2.8% to +3.1% in traffic volumes of all types on major roads between 2012 and 2020. However, the Mayor's Infrastructure Plan (based, according to TfL, on 'a strategic transport model for London') assumes that

car KMs driven will change by -1% to over +25% between 2011 and 2031, with significant variation across the region. TfL should have explained to the public the disparity between the LAQM model and the modelling which informed this stage of consultation so as not to present a misleading picture on air quality impacts of the Silvertown Tunnel scheme to Londoners. I only obtained this information through an in-person meeting with TfL officers.

#### Contravention of London Plan policies

Given that the Silvertown Tunnel is likely to result in increases in road traffic there is the potential for deterioration in local air quality within the Air Quality Management Areas (AQMAs) designated by the London Borough of Newham and Greenwich. London Plan policy 7.14c on Improving Air Quality states that any new developments should 'be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as AQMAs).' Only air quality neutral developments should be under consideration.

#### Potential EU fines for breaching legal limits for emissions

In a meeting with TfL's former Managing Director of Planning she informed me that even if TfL's schemes were found by its environmental modelling to be likely to pollute east London's air yet further, this would not be viewed as a reason not to proceed. Given the constraints of European law on what is an acceptable level of air pollution, I don't agree with her view. The law on air pollution is currently being tested in the courts and it is not clear whether traffic generating developments which damage the health of Londoners are going to be legally acceptable.

Should the Mayor and local authorities support river crossings schemes which subsequently cause London to exceed EU pollution limits, both would potentially incur fines. These penalties could severely impact on local authorities' ability to deliver services.

#### Emissions scenarios

TfL's assessment of the potential NOx increases caused by the various options is predicated on the assumption that the crossings would be tolled and that some lanes would be reserved for buses to use. There should also have been an assessment of potential NOx increases based upon the crossings' full, un-tolled potential capacity - there is no guarantee that tolls would not be removed or bus priority cancelled under a subsequent administration an 'adverse' scenario of > 10% increase in NOx could eventuate.

Bus links are not guaranteed, at least for the first two years of the tunnel's operation (7.3.8). Patronage doubling/tripling on existing bus services (p210) should be viewed sceptically as some of these routes carry very few people at the moment.

#### Impact of road capacity increase on human health – relevant research

There exists an extensive and respected body research on the adverse effects on human health of increasing road capacity. One relevant report is 'Degradation in urban air quality from construction activity and increased traffic arising from a road widening scheme', report by Anna Font, Timothy Baker, Ian S. Mudway, Esme Purdie, Christina Dunster, Gary W Fuller, available at <http://www.sciencedirect.com/science/article/pii/S0048969714010900>

Its key findings:

- Local air quality deteriorated after completion of a road widening scheme in south London.
- The EU PM<sub>10</sub> limit value (LV) was breached during construction.
- NO<sub>2</sub> LV was breached after scheme due to increased cars, taxis and LGVs.
- Increase of pro-oxidant components in the PM coarse mode after the road widening.
- Mean PM<sub>10</sub> emission factor for the construction phase was 0.0022 kg m<sup>-2</sup> month<sup>-1</sup>

TfL's consultation has not engaged with the findings of this research, despite their direct relevance to the road capacity increases it is proposing through its river crossings schemes.

Nor has this consultation drawn any attention to new research published by the Environmental Audit Committee entitled 'Action on Air Quality'

(<http://www.publications.parliament.uk/pa/cm201415/cmselect/cmenvaud/452/452.pdf>) that has revised the number of premature deaths in London caused by poor air quality upwards from 4,500 per year to 7,500 per year. This information is of direct relevance to Londoners as they consider how they will respond to this consultation, yet TfL has not included it alongside its lengthy justifications for the scheme on the consultation webpage.

**Traffic impacts: We have described the traffic impacts of the Silvertown Tunnel scheme and explained that we would monitor its effects on traffic before and after opening. Further details are set out in the 'Preliminary Transport Assessment' and 'Preliminary Monitoring and Mitigation Strategy', which is available to download. We would take appropriate measures to mitigate any negative effects that might occur as a result of the scheme. These measures could involve adjusting traffic light timings or other traffic management measures. If you have any concerns about the effect of the Silvertown Tunnel scheme in any particular location, or comments about how we might mitigate these, please let us know in the space below.**

#### Induced traffic

The Silvertown Tunnel will not address congestion. New roads attract new traffic. Research commissioned by the Department for Transport in 1994 entitled 'Trunk Roads and the Generation of Traffic' concluded "An average road improvement, for which traffic growth due to all other factors is forecast correctly, will see an additional [i.e. induced] 10% of base traffic in the short term and 20% in the long term".

When asked in person to provide an example of a crossing or link road that has not led to induced traffic, senior TfL officers have been unable to do so.

Further relevant research has been produced by the Victoria Transport Policy Institute - <http://vtpi.org/gentraf.pdf> (April 2014).

Also of note is the planning inspector's conclusion from the Thames Gateway Bridge enquiry – 'I have concluded that, on balance, the scheme would be likely to cause increased congestion' (9.187)

#### Failure to address congestion

The benefits that will accrue to the River Crossings Highway Assessment Model (RXHAM) simulation area if the Silvertown Tunnel is constructed have been overstated by TfL and do not justify the huge disruption and cost that this scheme would entail for Londoners.

The differences between travel times and average speeds for the reference case (no tunnel) and assessed case (Silvertown Tunnel is built) are insignificant (see table 7-5: 2021 reference case and assessed case RXHAM sim area outputs)

- Travel times will fall by just 0.37% in the AM peak, 0.49% in the inter-peak and 1.2% in the PM peak
- Average speeds will barely increase in the AM peak, inter-peak and PM peak with the new tunnel

#### TfL predicting that congestion will worsen

TfL admit that traffic flows are predicted to increase if the Silvertown Tunnel is built. Section 7.2.69 of the preliminary transport assessment states 'It can be seen that compared to the reference case, there is an increase in traffic flow in the Silvertown area as a result of the new tunnel and some small increases south of the River Thames on the approach to the tunnels (as a result of the reduction in congestion) and on the approaches to Tower Bridge.' TfL is misleading Londoners by stating in its consultation materials that the Silvertown Tunnel will address congestion when it is predicting traffic increases not only in the Silvertown area but as far afield as central London.

TfL predicts that volume to capacity ratio (VCR) (a measure comparing roadway demand (vehicle volumes) with roadway supply (carrying capacity)) will be adversely affected on multiple roads in both the AM and PM peaks if the Silvertown Tunnel is built. This will adversely affect the resilience of these roads. A central plank of TfL's argument in favour of Silvertown tunnel is that it will boost resilience so it makes no sense to worsen it on surrounding roads.

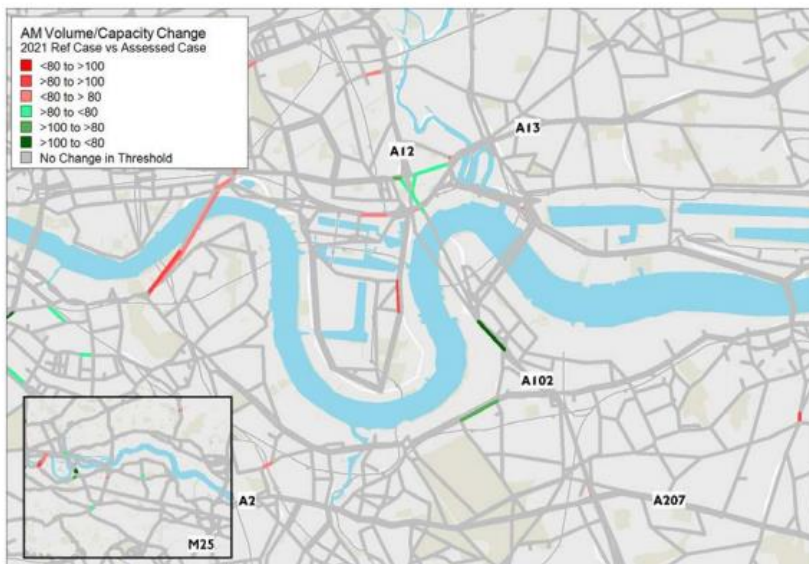
The over-capacity Blackwall tunnel currently acts to keep a lid on vehicle movements – vehicles cannot fit inside the tunnel and queues of traffic fill local roads. Once the blockage has been cleared, new flows of traffic will not only flood any proposed new link (the Silvertown tunnel itself) but the surrounding road network as more vehicles pass through to access the new crossing. These are serious unintended consequences that will make worsen congestion and pollution and traffic dominance.

As shown in TfL’s diagrams below, the Rotherhithe tunnel will face difficulty in handling the volume of traffic that will try to travel through it as will the A1206 on the Isle of Dogs, the A1261 running through Poplar, Newham Way (A13), the A102 and the A2 as more vehicles will be able to pile onto these roads than presently are able to.

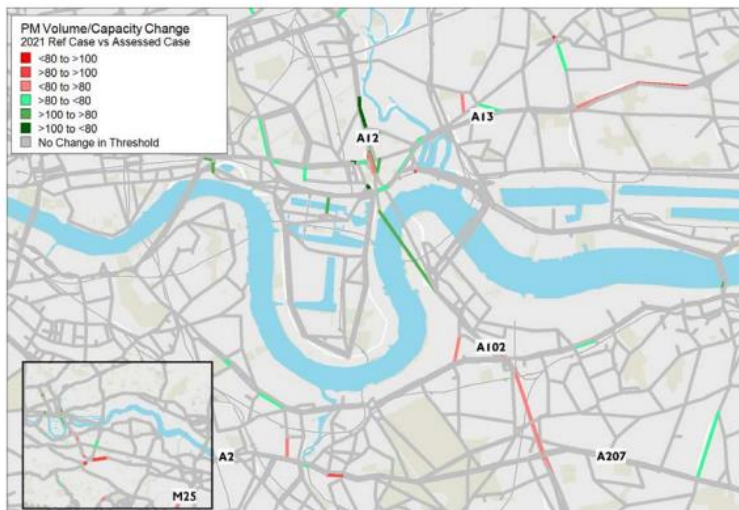
TfL has not publicised this information adequately to allow proper public scrutiny.

TfL intends to widen the A102 to cope with the predicted increase in traffic. With London’s road network facing pressure from a rapidly increasing population, the solution cannot be to widen roads to accommodate more traffic.

**Figure 7-16: VCR change with Silvertown Tunnel (Assessed Case v Reference Case, AM peak hour, 2021)**



**Figure 7-17: VCR change with Silvertown Tunnel (Assessed Case v Reference Case, PM peak hour, 2021)**



### Predicted delays

Delays are either possible or certain at 21 junctions if the Silvertown tunnel is built, both north and south of the River Thames according to Table C1 on page 275 of preliminary transport assessment appendices A-F (<http://content.tfl.gov.uk/preliminary-transport-assessment-appendices-a-to-f.pdf>).

### North of the river

- In the PM peak there will be an 'additional 5 min delay A13 for traffic exiting southbound A12 due to increased demand of approximately 300 passenger car units'
- In the PM peak 'northbound users on Whalebone Lane may experience an additional 3 minute delay'.
- In the AM peak there will be a 103 second delay increase per user in the A124 Rush Green Rd westbound and 32 seconds delay increase per user in Dagenham Rd southbound approach

### South of the river

- In the AM peak there will be a 100 second delay increase per user in the A100 Tower Bridge Rd northbound approach
- Junction between A21 Bromley Rd and Bellingham Rd/Randlesdown Rd - northbound users on the A21 may experience an additional 3 minutes of delay

TfL has deliberately buried this inconvenient information about considerable junction delays in an obscure annexe. Most Londoners do not have the time or ability to unearth this document and consequently will never read it. They are therefore prevented from understanding the potential for the Silvertown Tunnel to congest the local roads that they rely on. TfL should have prominently displayed this delay information at each of the junctions in question by attaching a summary onto lamp posts or other locations within the public realm with the consultation email address attached.

TfL currently have no plan to introduce mitigation measures at any of the roads or junctions identified above (see section C.5.1 of preliminary transport assessment). Given the serious risk of considerable delays at many junctions, it is not acceptable that TfL will only submit a draft monitoring and mitigation strategy when it submits a Development Consent Order (DCO) application. A comprehensive strategy on how TfL intends to avert these predicted considerable delays should already have been published and presented for scrutiny at this stage.

**Cross-river bus services: The Silvertown Tunnel scheme would give us the opportunity to introduce new cross-river bus routes for east London. We have described an illustrative cross-river bus network for east London in the 'Preliminary Transport Assessment', which is available to download. If you have any comments on the introduction of new cross-river bus routes please let us know in the space below.**

Page 206 of the preliminary transport assessment states "While the Silvertown Tunnel scheme would provide the opportunity to improve cross-river bus links, the typical lead time for London Buses to implement bus service changes is around two years. Therefore, since the Silvertown Tunnel has an assumed opening date of 2022/3, any plans for the bus network at this time can only be indicative and for the purpose of assessing operational feasibility." The bus links that TfL is promising to Londoners are by no means guaranteed (see 7.3.8) and this should have been made explicit in the consultation documents, especially figure 7-21 (indicative Silvertown Tunnel cross-river bus network map).

One of TfL's main justifications for the scheme is that it will boost cross-river public transport capacity and has something to offer all Londoners, not just motorists. TfL claim that 5,400 extra cross-river trips would be made in the assessed case rather than the reference case and that all growth can be attributed to new trips on the new bus routes (see 7.2.49). If the promised bus services do not materialise, the growth in cross-river trips could come from increased private vehicle trips, not public transport trips. There is no mention in the consultation literature that bus services are not guaranteed and this is misleading.

Patronage 'doubling/tripling' on existing bus services (p210) should be viewed sceptically as some of these routes carry very few people at the moment.

In its assessment of how many jobs can be reached by public transport or private car, TfL have put public transport at a major disadvantage to private transport because of the methodology used (7.5.1). To assign a

greater value to the time spent by someone sat in their car in a traffic jam to the time someone spends checking emails and reading on a bus or train is wrong. The methodology is flawed.

**Please tell us what you think about the quality of this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and questionnaire etc.)**

#### Inadequate information

The public has only been provided with a series of preliminary assessments, preliminary drawings and maps, a preliminary outline business case and preliminary statements on which to make a decision.

Given that this is the final stage of consultation, a full environmental impact assessment and more extensive traffic modelling to show the impacts of the scheme five, ten and twenty years after construction should have been published by now. Traffic modelling for the Thames Gateway Bridge (TGB) scheme predicted that traffic would not double until a year after completion – 2023/24 in the case of Silvertown – and that it would keep growing for up to 5 years after the end of the time periods looked at in the TGB modelling.

The full air quality impacts of the scheme will not be known until the public are no longer being consulted. There will therefore be no way for individuals and groups to get their concerns on the record and this is unacceptable.

#### Leading consultation questions

TfL's consultation questions are neither objective nor neutral. For example, the first question invites the respondent to comment on a scheme which has already had a list of positive outcomes (will reduce congestion, will support future growth) ascribed to it. A neutral question should have been posed, for example 'Do you support the Silvertown Tunnel scheme?'

#### Failure to consult on public transport or cycling schemes concurrently

TfL's 'Responses to Issues Raised' document stated 'there is a strong appetite within the public and stakeholders for TfL to consider crossing improvements for cyclists, pedestrians and public transport users'. However, TfL has not acted on this feedback. It has produced thousands of pages of documents justifying the Silvertown Tunnel but only six pages on public transport alternatives to be judged alongside it. Nor has it carried out research into road pricing and sought the public's views on this alongside this road-building scheme.

The alternatives are presented separately, not as a comprehensive package as requested by myself and campaign groups previously. The first 1.5 pages of the alternatives document covers alternative road rather than public transport options.

The Environment Options paper stated 'TfL estimates that Newham is a Borough with a very high potential for increasing cycling, due to its flat topography, density and the proximity of services to where people live' and also comments on the borough's low incomes have resulted in low car ownership. Newham is also the local authority with the highest proportion of people commuting by public transport (65.5%).' Given Newham's significant cycling potential, the limited role of private cars in the borough and its population's heavy use of public transport, investing in cycling and public transport infrastructure is clearly more suited to the local context than a road scheme likely to make Newham a conduit for through drivers from outside of London or other parts of the city. The scheme will pollute and congest the area heavily whilst benefitting locals minimally.

There are various public transport options on which TfL has not consulted the public. A London Overground extension from Barking Riverside to Thamesmead and Abbey Wood would link up to Crossrail and transform these isolated areas and this should have been put to the public at the same time as road crossings.

#### Misleading claims on river crossings' potential to create new jobs

The Atkins report predicts that the Silvertown Tunnel and the Gallions Reach bridge would support up to 34,000 total permanent jobs. No detail is provided, however, about which sectors the jobs would be in. TfL appear to be predicting that between 6-9am, around 10,000 vehicles would use the newly tolled roads across the river. This apparent mismatch between the 34,000 supported jobs and the much lower levels of commuter traffic is not explained. I can only assume that the Atkins Report is assuming a much higher traffic flow across the river, than TfL are predicting.



Reduced labour market accessibility if Silvertown Tunnel is built

The Silvertown Tunnel will make it impossible for 122,176 jobs to be reached by car within 45 minutes in the morning rush hour. Barking and Dagenham, Newham, Tower Hamlets and Southwark commuters will lose out in this way. Greenwich, Lewisham and Bexley residents stand to gain at their expense.

It is unfair that residents in poorer London boroughs will be penalised so that residents in more affluent boroughs south of the river Thames can drive to work more easily. It would also surprise many Londoners as far afield as Southwark that this tunnel will affect their lives so negatively and significantly.

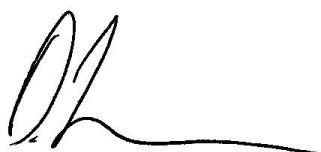
These figures also make a mockery of TfL's argument that the Silvertown Tunnel will boost incomes and make life more convenient for all.

These figures were provided to me in private correspondence on request from TfL.

	Reference case access to jobs in 45min by car (AM)*	Change in access to jobs by car from Scheme (AM)**	% Change in access to jobs by car from Scheme (AM)
Barking and Dagenham	1,791,318	-7,609	-0.42%
Greenwich	1,375,130	+282,684	+20.56%
Lewisham	1,896,027	+85,297	+4.50%
Newham	2,707,522	-46,906	-1.73%
Tower Hamlets	3,497,954	-16,588	-0.47%
Southwark	3,147,089	-51,073	-1.62%
Bexley	1,048,499	+300,034	+28.62%

I hope that my input is taken into account by TfL.

Yours Sincerely,



**Darren Johnson AM**

Green Party Member of the London Assembly