

Silvertown Tunnel: Secretary of State's request for comment ~ Response from Campaign for Better Transport

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment.

The Silvertown Tunnel planning application proposes a new four lane road under the River Thames between Silvertown and north Greenwich, parallel to the existing Blackwall Tunnel. We welcome the scrutiny given the proposals by the Secretary of State. We submit that the tide of evidence and policy continue to turn against the application.

Campaign for Better Transport has [previously made representations](#) on the plans to the applicant and to the Planning Inspectorate, setting out our case against the proposals.

During the course of the Inquiry, we heard fresh evidence of induced traffic from new roads; the legal requirements on air quality have strengthened; Boroughs that previously supported the plans have spoken against them; and the applicant's position on tolls remains inconsistent.

In responding to the latest submissions, we draw the Department's attention to further evidence on air quality and on CO2 emissions that strengthens the case against the Silvertown Tunnel and for re-opening the planning inquiry.

Air quality

Since the conclusion of the public inquiry, the Government has published the UK Air Quality Plan, which requires all local authorities to take urgent action to bring air quality in line with mandatory standards (set in the EU Air Quality directive and upheld by the Supreme Court) with plans in place no later than the end of 2018.¹

We note the submission from LB Southwark that the increased traffic from the Silvertown Tunnel, combined with a lack of proposed mitigation along the A200 corridor will make it harder for the borough to meet its obligations contained within the UK Air Quality Plan, and believe that this will be true for all boroughs experiencing the prospect of increased traffic and uncertain mitigation.

Furthermore, the latest figures on real world driving emissions confirm that 90% of tested Euro 6 diesel vehicles exceed the Euro 6 limits when on the road, with the average emissions being 4.5 times greater on the road than at test.²

We welcome the submission from Friends of the Earth which draws attention to the Mayor of London's new aspiration for London's air quality (meeting World Health Organisation health-based guidelines by 2030).

We agree with Friends of the Earth that to fulfil the High Court requirement to reduce exposure to NOx and comply with air quality standards as quickly as possible, it cannot be permissible to allow air pollution to be worsened for part of the population, as would inevitably result from the proposed Silvertown tunnel. Even a marginal increase in traffic levels will make air quality worse, and it is beyond the applicant's power to prevent this.

¹ DEFRA/DfT (July 2017) UK plan for tackling roadside nitrogen dioxide concentrations

² Baldino et al (September 2017) ICCT White Paper "Road tested: comparative overview of real-world versus type-approval NOx and CO2 emissions from diesel cars in Europe"

We believe these recent developments require revisiting of the air quality assumptions and modelling for the Silvertown Tunnel, which otherwise risks underestimating pollution levels and risking not only the applicant's policy goals but also national policy requirements.

CO2 emissions

The latest report from the Committee on Climate Change identifies that the UK is not on track to meet the fourth carbon budget (2023-27) and that despite progress in cutting emissions from other sectors, transport emissions continue to grow.

The UK CCC reports that meeting future carbon budgets and the UK's 2050 target to reduce emissions by at least 80% of 1990 levels will require reducing domestic emissions by at least 3% per year, noting that "this will require existing progress to be supplemented by more challenging measures." A key requirement is to reduce road travel demand, delivering car-km reductions of at least 5% below the baseline trajectory.³

Increasing major road capacity, particularly in an urban environment where public transport options are available, is directly contrary to that requirement. We welcome the recognition in the draft Mayor's Transport Strategy that three quarters of journeys currently made by car could be made by public transport, walking or cycling instead.⁴

The phenomenon of induced traffic is well-known, and has been confirmed since the Inquiry hearings in a recent report *The Impact of Road Projects in England*. This detailed study of over 80 road schemes in England found that traffic increased across the board. Of 13 schemes studied in depth, the average increases over the short run (3-7 years; seven schemes) were +7%. Average increases over the long run (8-20 years; six schemes) were +47%. These were increases over-and-above background traffic growth.⁵

Doubling road capacity through constructing the Silvertown Tunnel will inevitably increase traffic through the area and is therefore wholly incompatible with the action identified as necessary by the UK CCC.

We respectfully submit that the Secretary of State should direct that the Inquiry into the proposals for the Silvertown Tunnel be re-opened to enable further scrutiny in the light of these developments.

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Bridget Fox
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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³ Committee on Climate Change (June 2017) Reducing emissions and preparing for climate change: 2017 Report to Parliament Summary and recommendations

⁴ TfL (February 2017) Transport classification of Londoners – presenting the segments. Travel in London supplementary report

⁵ Sloman L, Hopkinson L and Taylor I (2017) The Impact of Road Projects in England Report for CPRE