



# Living Streets response to the Silvertown Tunnel Updated Air Quality Assessments

## About Living Streets

We are Living Streets, the UK charity for everyday walking. We want to create a walking nation, free from congested roads and pollution, reducing the risk of preventable illnesses and social isolation and making walking the natural choice. We believe that a walking nation means progress for everyone. Our ambition is to enable people of all generations to enjoy the benefits that this simple act brings and to ensure all our streets are fit for walking.

## Response

- We are strongly opposed to additional highway capacity as part of the plan at Silvertown, and expect to see infrastructure that enables active travel
- We strongly dispute the adequacy of the tests used in the Updated Air Quality Assessments, and consider them not in line with EU law
- Despite constituting a material change in levels recorded, the predicted air quality worsenings below  $0.4 \mu\text{g}/\text{m}^3$  in tables C1 and C2, Appendix C have been discounted
- According to paragraphs 2 and 3 of McCracken QC as to Air Quality Directive 2008/50/EC and Planning<sup>1</sup>, a development which causes a breach or worsens an existing breach in its locality must be refused under the Directive, thus rendering the Silvertown tunnel proposal non-compliant
- The evidence on capacity induced demand is unequivocal, and new large road projects worsen both pollution and congestion; the Campaign to Protect Rural England in 2017 found that major new roads increase traffic above the general traffic increases for their areas, with traffic increases of up to 47% over 20 years<sup>2</sup>
- Creating infrastructure that encourages and enables people to walk, cycle, and use public transport for their everyday journeys is the most cost effective and sustainable way to reduce air pollution and congestion on the road network, especially in cities

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<sup>1</sup> [https://cleanair.london/app/uploads/CAL-322-Robert-McCracken-QC-opinion-for-CAL\\_Air-Quality-Directive-and-Planning\\_Signed-061015.pdf](https://cleanair.london/app/uploads/CAL-322-Robert-McCracken-QC-opinion-for-CAL_Air-Quality-Directive-and-Planning_Signed-061015.pdf)

<sup>2</sup> <http://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus>