

No To Silvertown Tunnel [SILV-227]

Written Representation to the Secretary of State for comments on the Silvertown Tunnel Applicant's Updated Air Quality Assessment, published 28 February 2018.

1. No to Silvertown Tunnel welcomes the chance to comment on Transport for London's Updated Air Quality Assessment.

1.1. We continue to maintain our original position regarding the Applicant's air quality modelling. TfL's strategy for assessing air quality impacts is based on its own traffic modelling, and it gives its own assumptions precedence over other traffic data, such as that used in the London Atmospheric Emissions Inventory. Therefore, our concerns over the levels of risk in the traffic modelling carry over into our response to TfL's air quality monitoring.

1.2. We note that there are a number of places where TfL estimate worsening air quality as a result of the Scheme. These include receptors R4 and R5 (the A102 Woolwich Road flyover which would worsen both to the west and east); and six further receptors shown in Table C-2, Appendix C.

1.2.1. While we respect the Applicant's assessment that in some areas air quality would be improved by the Scheme, linking the places with worsening air quality with the places which would see an improvement is not compatible with EU law, as compliance can't be assessed as an average of concentrations within an AQ Zone.

2. We support the Friends of the Earth analysis of the details of the Applicant's Updated Air Quality Assessment, including their argument that the Scheme would conflict with the High Court rulings in the cases brought by Client Earth and would therefore not be compliant with the Secretary of State's obligations to improve air quality in every area to European Union standards as quickly as possible.