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By post and email: mayor@london.gov.uk and rivercrossings@tfl.gov.uk

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Dear Mayor Johnson and Transport for London

Objection to the option of a new road tunnel between Silvertown and Greenwich peninsula

Clean Air in London (CAL) welcomes the opportunity to be consulted on options for new river crossings in East and South East London.

Our response focuses on the proposed road tunnel between Silvertown and the Greenwich peninsula. We have no views on the proposed ferry at Gallions Reach at the present time.

CAL campaigns to achieve urgently and sustainably full compliance with World Health Organisation guidelines for air quality throughout London (and elsewhere).

Traffic is a major cause of air pollution in London which in turn causes thousands of premature deaths per year, and many thousands more instances of illness, chronic illness and disability.

The proposed road tunnel running between the Greenwich Peninsula and Silvertown would result in an increase in road traffic in these areas; it is therefore a proposal that will also have a significant impact on air quality.

We object to the option of constructing a new road tunnel between Silvertown and the Greenwich peninsula on the ground that the project would cause an increase in the levels of nitrogen dioxide (NO₂) and/or dangerous airborne particles (PM₁₀) concentrations.

Duty in relation to limit values

The EU's Ambient Air Quality Directive 2008/50/EC ("the Directive") was transposed into UK law by the Air Quality Standards Regulations 2010 ("the Regulations").

The Secretary of State is subject to a general duty set out in s17 of the Regulations:

“17.—(1) The Secretary of State must ensure that levels of sulphur dioxide, nitrogen dioxide, benzene, carbon monoxide, lead and particulate matter do not exceed the limit values set out in Schedule 2.

*(2) In zones where levels of the pollutants mentioned in paragraph (1) are below the limit values set out in Schedule 2, the Secretary of State **must ensure that levels are maintained below those limit values** and must endeavour to maintain the best ambient air quality compatible with sustainable development.” (emphasis added).*

Where compliance has been achieved at a given location, a measure that pushes air pollution levels above the limit value(s) at that location would therefore constitute a breach of the Regulations.

Silvertown

North of the river, the air quality monitoring station on the road immediately after the present Blackwall Tunnel that would be affected by any traffic using the Silvertown tunnel and rejoining the A12 north of the river is at Tower Hamlets on the Blackwall Tunnel Northern approach Abbott Road junction.

In 2012 the air quality at this location was compliant with PM₁₀ limit values (26 out of 35 allowable ‘Bad Air Days’), but was non-compliant with NO₂ limit values as the annual mean of 60 ug/m³ was above the limit value of 40 ug/m³.

http://www.londonair.org.uk/london/asp/publicstats.asp?mapview=all&statyear=2012&MapType=Google®ion=0&site=TH4&postcode=&la_id=&objective=All&zoom=9&lat=51.431751825946115&lon=0.17578125&VenueCode=

Greenwich peninsula

The nearest air quality monitoring station on the road immediately south of the proposed Silvertown tunnel is a roadside location at the Woolwich Flyover in Greenwich.

In 2012 the air quality at this location was marginally compliant with PM₁₀ (30 out of 35 allowable ‘Bad Air Days’), but was non-compliant with NO₂ limit values as the annual mean of 70 ug/m³ was substantially above the limit value of 40 ug/m³.

http://www.londonair.org.uk/london/asp/publicstats.asp?mapview=all&statyear=2012&MapType=Google®ion=0&site=GR8&postcode=&la_id=&objective=All&zoom=9&lat=51.431751825946115&lon=0.17578125&VenueCode=

The limit values for NO₂ have been binding since 1 January 2010, and no time extension has yet been granted to the UK for compliance with the NO₂ limit values in London; there is an ongoing obligation to maintain air quality below limit values at these locations. No time extension has been possible for PM₁₀ since 2011.

Compliance must be achieved in all parts of any given zone, i.e. throughout London. Limit values are absolute and the averaging of impacts across Greater London as a whole is not allowed.

Conclusion

Proceeding with a new Thames tunnel from the Greenwich peninsula to Silvertown would increase the number of vehicles passing through the densely populated area of Tower Hamlets which houses one of the highest ethnic minority populations in the capital. The increase in road traffic using the new tunnel would result in a reduction in air quality in Greenwich and Tower Hamlets where NO₂ concentrations are already above limit values. The Secretary of State has a duty to reduce the NO₂ levels to below limit values and to at least maintain the PM₁₀ levels at their current level in these areas.

The Mayor should be prioritising measures to reduce air pollution, not increase it. In any event, breaches of air pollution laws must be mitigated in full and concurrently.

Yours faithfully

Simon Birkett
Founder and Director
Clean Air in London