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Attachments: [image001.png](#)
[SilvertownPHEDec16v6.pdf](#)

Dear Neil

Please find attached Public Health England's response with respect to the above.

Should you require any further information please contact Nsipconsultations@phe.gov.uk

Kind regards

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14 December 2016

Dear Neil

**Nationally Significant Infrastructure Project
Proposed Silvertown Tunnel
Update on discussions with Applicant**

Thank you for your letter dated 7th December providing an update on discussions with PHE in regards to the Silvertown DCO application. Your letter details the areas of agreement and also those where further discussions are ongoing and we have responded to the points raised below.

2. Matters discussed at the meeting on the 1st December 2016

2.1 Active Travel

PHE remaining issue (email dated 14.11.16): *'PHE London would like to see something more conclusive on the promotion of active travel'.*

Applicant response: at the meeting on the 1.12.16 TfL explained the option selection process and summarised the measures in the submission which support active travel. This included scheme specific measures (e.g. the new Boord Street footbridge); and also measures to ensure the scheme integrates into the existing cycle and pedestrian networks within the vicinity of the tunnel portals at Greenwich and Silvertown. TfL committed to providing a summary of TfL/Mayoral plans for river crossing, which is set out below.

The Silvertown Tunnel Scheme is not being delivered in isolation and significant investment has been made in cross-river travel options in east London in the last 20 years, with the delivery of:

- Jubilee Line Extension to Stratford;

- DLR to Lewisham;
- DLR to Woolwich;
- re-opening of the East London Line and its inclusion in the London Overground network;
- Emirates Air Line; and
- Crossrail (due to open in 2018).

The Mayor's next priorities for river crossings in east London were set out in the Update Report October 2016 (AS-021). This multi-modal approach includes the Silvertown Tunnel Scheme as well as a dedicated pedestrian and cycle bridge between Rotherhithe and Canary Wharf and a DLR at Gallions Reach, and does not preclude the delivery of further road crossings in the future.

The Update Report October 2016 (AS-021) sets out the Mayor's next priorities for river crossings in London, and this includes progressing a pedestrian and cycle bridge between Rotherhithe and Canary Wharf as well as further investigations into a ferry link between North Greenwich and the Isle of Dogs. Neither of these schemes are required to deliver the benefits or mitigate the impacts of the Scheme and are therefore not included in the DCO submission that is the subject of this Examination process and will be progressed through separate planning application process/es.

Next steps: please can PHE confirm there is now agreement on the provision for active travel.

PHE response:

The issue from a PHE perspective is that a road scheme of this nature and scale is remiss in not accommodating active travel within and through the new river crossing.

While TfL state that options for active travel through the tunnel were considered and dismissed, PHE would like TfL to make a commitment to incorporating cycling within the DCO so that cyclists can benefit from shorter, safer travel by means such as allocated spaces and bike racks on the buses that will go through the tunnel.

Customer satisfaction surveys¹ of the Emirates airline suggest that:

- a) travellers do not use the airline on a regular basis, and
- b) the airline is 'something fun to do' and therefore it is unlikely that regular commuters will use it or that cyclists will utilise it to support active travel to cross the river..

2.2 Environment (Air Quality) Mitigation measures

PHE remaining issue (letter 6.11.16): *'It would be helpful for TfL to confirm their proposals/approach to urban greening in areas surrounding the Hoola building'*.

¹ <https://tfl.gov.uk/corporate/publications-and-reports/emirates-air-line-performance-data#on-this-page-2>

Applicant response: the Applicant presented the proposals set out in the DAS for greening at Silvertown at the meeting on the 1.12.16. The Applicant sent links to the Design and Access Statement and the Design Principles by email on the 2.12.16. As discussed at the meeting PHE will review the Design Principles and DAS which provide the parameters within which the landscaping and public realm will be developed.

Next steps: please can PHE confirm there is now agreement on proposals for urban greening in the vicinity of the Hoola development.

PHE response

PHE has reviewed the Design Access Statement and Design Principles and was unable to locate specific references to urban greening proposals in the vicinity of the Hoola development but rather details on the generic approach associated with the overall development. In case we have inadvertently missed any relevant information we would be grateful if you could direct us any specific proposals for urban greening in the vicinity of the Hoola building.

2.3 Effects on community anxiety/stress

PHE remaining issue (email 14.11.6): *while the air and noise stressors have been assessed, PHE London would like assurance that the combined effect of these stressors on both physical and psychological wellbeing has been assessed.*

Applicant response: this was discussed in depth at the meeting on the 1.12.16. The Applicant tabled a note which is Appendix 1: Stress in Combination attached to this letter. This sets out how in combination effects on stress were addressed in the Health and Equality Impact Assessment (HEqIA). The Applicant also committed to providing a summary of how stress was assessed in the HEqIA. This is Appendix 2 to this letter. Subject to PHE review of these two documents, we believe the assessment of stress has now been agreed.

The only outstanding issue from the meeting was that of monitoring stress levels as a result of scheme operation. It was discussed that it is very difficult to identify a viable mechanism for this with an identifiable study area, methodology, and results that can be quantified and be meaningful. PHE took an action to look into this. PHE stated that this maybe something that would be looked at post DCO approval. Air quality is a big issue for London and therefore this may be a wider topic. It would be useful if PHE could let TfL know whether this is something they would like to pursue as part of this DCO process at the hearing or whether this is a separate issue.

Next Steps: please can PHE confirm that there is now agreement on the assessment of stress in the HEqIA. Please can PHE also advise how they would like to proceed on the issue of monitoring stress.

PHE response:

PHE are concerned that there may be a cumulative impact to overall wellbeing for the residents living in close proximity to the Silvertown Tunnel.

PHE would request that TfL offer to undertake a baseline assessment of community wellbeing of the affected communities before the construction phase using an agreed methodology i.e. the Community Life Survey², ONS 4 Wellbeing question³ or the short Warwick-Edinburgh Mental Wellbeing (WEMWBS) scale⁴ so that bodies such as the local authorities, PHE or the GLA can undertake further investigations to monitor wellbeing in affected communities.

2.4 Crossing Charge

PHE remaining issue (letter 6.11.16): *'PHE is very concerned with the introduction of a charge to use the existing river crossing, Blackwall Tunnel, which is currently free of any charge. PHE is primarily concerned that the level of the charge may present a greater burden on those in the lower socio-economic groups, who use Blackwall Tunnel as a means to access employment, healthcare, etc. and the introduction of the charge may have a 'community severance' effect.'*

Applicant response: this issue was discussed at the meeting on the 1.12.16. A response was tabled which is appended at Appendix 3.

Next steps: please can PHE confirm whether there is now agreement on the crossing charge and low income groups.

PHE response:

While TfL have stressed that car ownership is low amongst the current residents around the Blackwall and Silvertown Tunnels and that there will be a net gain by the introduction of more public transport/ buses through the Silvertown Tunnel,

PHE is concerned that a charge will represent an inequality to those residents who own a car and are on low incomes.

PHE would request that TfL considers mitigation options such as exemptions for car owners in existing local communities to both Blackwall and Silvertown

2

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/539111/community_life_survey_consultation_response_final.pdf

3

<https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/bulletins/measuringnationalwellbeing/2015-09-23>

4

<http://www.cppconsortium.nhs.uk/admin/files/1343987601WEMWBS%20User%20Guide%20Version%201%20June%202008.pdf>

Tunnels on the basis that the majority of the traffic will come from outside the boroughs

2.5 Zoning for 20 mph

PHE remaining issue (from email 14.6.16): *PHE first raised this at our meeting on the 09.08.16 and have considered the verbal explanations and written responses provided by TfL since then. However we are still not fully satisfied with the reasoning provided by TfL for not undertaking modelling of a 20mph zone as part of the scheme. PHE would like greater assurance that there will be commitment to model the 20mph zones on appropriate roads. We recognise that this may not be appropriate for major arterial roads however would like TfL to consider appropriate routes where there is proximity to schools and residential areas’.*

Applicant response: this issue was discussed at the meeting on the 1.12.16. A response was tabled which is appended at Appendix 4.

Next steps: please can PHE confirm there is now agreement on the project not monitoring or implementing 20mph zones.

PHE response

PHE note TfL’s response which primarily focusses on the implementation 20mph zones, as well as the existing use and planned expansion of these zones in Greenwich. The response does not appear to have considered the role of such zones in Newham.

PHE would like to clarify that its request relates to the modelling of 20mph speed limits to assess any potential benefits in terms of air quality, and notes that this could also potentially provide an improved evidence base to inform the Traffic Impact Mitigation Strategy [doc ref 7.7 TRO10021] which TfL has proposed to include ‘*adjustment to speed limits to manage localised congestion, air quality and/or noise impacts’ that could be used should it be necessary to regulate the traffic flows and potential effects.*

1. Matters in which PHE are in disagreement

3.1 Local air quality should not be worsened (letter 6.11.16): *‘PHE recognise that the Environmental Statement concludes that there are more receptors that experience a perceptible improvement in air quality compared to deteriorations, despite emissions from the scheme increasing overall. However, TfL have stated that this improvement is not determined as significant under the IAN 523 guidance and hence concludes that the scheme will have “no significant impact” on air quality. Hence, PHE would like to clarify their position as follows: PHE would encourage any new road or traffic development to consider, if practicable and cost effective, opportunities to secure improvements in local air quality’.*

Applicant response: the Applicant has prepared the following response: Although the Scheme does not result in a significant impact on air quality in accordance with the guidance (Interim Advice Note 174/13), the Applicant has investigated whether there are any mitigation measures that could be included in the Scheme. This led to including the commitment to operating Euro VI or equivalent buses through the Silvertown tunnel. The commitment to Euro VI buses will reduce some of the Scheme's impacts particularly at the receptor which is predicted to experience the largest change (Hoola development west tower). It should be noted that overall the scheme has a beneficial impact on those receptors with the highest modelled concentrations (particularly around the northern portal of Blackwall Tunnel), i.e. those above the AQS Objective and will therefore contribute to an improvement in air quality within some Air Quality Management Areas and Air Quality Focus Areas. It is the Applicant's view therefore that it has considered whether there are any practice measures that could be included in the Scheme to improve air quality.

Next steps: Please can PHE respond to the above with any outstanding issues.

PHE response:

PHE notes TfL's assessment that the proposed scheme does not result in a significant impact on air quality in accordance with the guidance (Interim Advice Note 174/13). However in light of an overall increase in emissions of air pollutants and a detriment to particular receptors (e.g. Hoola development west tower), PHE continues to encourage consideration, if practicable and cost effective, any opportunities to secure improvements in local air quality (note PHE's response to section 2.2. air quality mitigation measures).

I hope these responses are helpful and PHE would be happy to discuss these matters further

Yours sincerely

nsipconsultations@phe.gov.uk

Cc: Amanda Pownall, Transport for London
National Infrastructure Planning Administration