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Peter Robottom
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27 January 2017

Dear Mr Robottom

**Nationally Significant Infrastructure Project
Proposed Silvertown Tunnel
Air Quality, Noise and other Environmental Issues Hearing**

Thank you for inviting Public Health England to the above hearing on the 18th January. There were three areas raised for discussion which we have attempted to address separately below in response to the most recent comments TfL provided to PHE in advance of the hearing also available [here](#):

Environment (Air Quality) Mitigation Measures

PHE remaining issue:

‘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’.

TfL response

The Hoola development is directly adjacent to and outside the limits of the scheme. According to the existent planning permission, the Hoola development remodels the footway and delivers its own landscaping between the footway and the buildings themselves. The Silvertown Tunnel Scheme does not impact upon the Hoola Development’s landscaping area, and given the Hoola Development is not included within the Order Limits, there is no scope to provide any additional landscaping here. Other opportunities for landscaping within the limits of the scheme are presented in the General Arrangement drawings (APP-005). It should also be noted that area of land in the centre of Tidal Basin Road and to the east of Silvertown Way is outside of

the permanent land take and as such the ecological value of the existing trees will be retained in the final scheme.

PHE response

During the hearing the applicant highlighted that an updated air quality impact assessment had been undertaken with some additional modelling to estimate projected concentrations if the scheme was operational in 2023 rather than 2021. The new figures offer reassurance that provided the scheme is operational in 2023 rather than 2021 the exposure to nitrogen dioxide in the vicinity of the Hoola building, will be below the current air quality standard for nitrogen dioxide. PHE would continue to encourage the applicant to consider opportunities to incorporate green space within the development due to the growing evidence that proximity to good quality green space has an important influence on the health of local populations¹.

Zoning for 20 mph

PHE remaining issue

PHE note TfL's response which primarily focusses on the implementation of 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 (APP-99) 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.

TFL response

The Applicant notes that PHE are satisfied that 20mph speed limit would be inappropriate on TLRN routes. The Applicant only has a remit for traffic management on TLRN roads, all other roads fall under the jurisdiction of the London Boroughs. The boroughs do have a rolling programme of 20mph zones which takes into consideration accident rates and local uses, such as schools and the proposed 20mph zones within Greenwich were provided as an example. The only avenue for the project to impose 20mph limits on local roads would be through the Development Consent Order process. This would only be an option if the Silvertown Tunnel project identified, and was required to mitigate, any significant environmental effects, for example: increased traffic flows, accidents, congestion and air pollution. The Transport Assessment (APP-086) and Environmental Statement (AS-022) do not identify any such effects and so mitigation (which could include implementation of 20mph zones if appropriate) is not proposed.

It should be noted that mitigation is built into the scheme design, as described in Section 6.5 of the ES (AS-022). In the Assessed Case, the user charge has been set at a level which shows the Scheme is not likely to result in a significant impact on local traffic flows or air quality. The Monitoring Strategy (REP1-121) which takes

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/355792/Briefing8_Green_spaces_health_inequalities.pdf

effect some three years prior to Scheme opening, will monitor the effects of the Scheme on a range of areas including road safety. The Monitoring Plan at Appendix A is indicative and will be finalised subject to any further suggestions from STIG prior to implementation. The Traffic Impacts Mitigation Strategy (APP-099) sets out a number of potential mitigation options which 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.

PHE response

PHE would like to reiterate that our request relates to the modelling of a 20mph zone rather than a commitment for TfL to implement such a speed restriction. PHE were encouraged by discussions at the hearing where the applicant recognised the potential benefits of lower speed limits on air quality and also discussed in general the implementation of 20mph speed limits on TLRN roads. PHE welcomes the request from the planning inspectorate for further detail on consideration of differences in traffic flows at 20mph vs 30mph. Hence, PHE look forward to the submission from TfL at deadline 3.

PHE remaining issue:

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).

Applicant 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 a 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.

PHE response

PHE notes from the most recent Air Quality Impact assessment (Dec 2016) a decrease in the number of receptors that are predicted to experience an improvement in air quality (3.5% / n=485) compared to the previous air quality impact assessment (4.4% / n= 584), however the number of receptors predicted to experience a deterioration in air quality has decreased in the latest air quality

assessment (3.2% / n= 441) compared to the previous assessment (485 (3.76% / n = 485). PHE encourages continued efforts to identify opportunities to improve air quality or options to mitigate any adverse impacts.

Should you have any questions or concerns please do not hesitate to contact us.

Yours sincerely

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Please mark any correspondence for the attention of National Infrastructure Planning Administration.

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