

No to Silvertown Tunnel [SILV-227]

Deadline 6 Post-Hearing Submission, 31 March 2017

1. The No to Silvertown Tunnel air quality studies

1.1. At the Open Floor Hearing on 28 March 2017, an interested party, Rebecca Moore, referred to the results of No to Silvertown Tunnel's air quality testing in 2014. The Examining Authority wished to hear more details. This note aims to explain the context of this testing.

1.2. No to Silvertown Tunnel carried out three month-long air quality studies, using diffusion tubes to record nitrogen dioxide, in 2013¹, 2014² and 2015³. We referred to these in our opening written submission [REP1-059]⁴. We did not submit the full data to the examination because we feel the official data, which covers longer periods, makes our case for us.

1.3. However, our studies provided us with useful snapshots of the air quality in the area, and have been acknowledged as such by the Applicant in its air quality statement [AS-022]⁵. They've also led to other groups, such as East Greenwich Residents' Association, carrying out their own studies.

1.4. Our 2014 and 2015 studies complied with the dates set by DEFRA, so they complemented the work carried out by local authorities.

2. Our testing in Bramshot Avenue

2.1. The result Rebecca Moore referred to as coming from Siebert Road to come from our 2014 study. This involved us working with another campaign group to place 100 tubes in locations across south-east and east London between 6 January and 7 February 2014.

2.2. However, Ms Moore was mistaken to say the result came from Siebert Road. It came from a lamp post in Bramshot Avenue, which is just the other side of the A102 from Siebert Road. Both streets lie adjacent to the A102, and are linked by a subway.

2.3. We feel this site is still relevant to the residents of Siebert Road and Westcombe Hill as their properties back onto the A102 at this point. Our tube overlooked the entrance to the subway, which is a much-used route to and from local schools. These include Invicta Primary School, whose premises adjoin Siebert Road. Image 2-1 shows a map of the area and a photograph of the site.

2.3. This site recorded 104 microgrammes per cubic metre over the month.

2.4. The Bramshot Avenue reading was consistent with other readings from tubes placed alongside very busy roads. In the same study, we recorded 109µg/m³ on the A20 in Lewisham town centre and 110µg/m³ on the A2 at the New Cross one-way system.

¹ <http://www.silvertowntunnel.co.uk/our-study/what-we-did/>

² <http://www.silvertowntunnel.co.uk/pollution/2014-silvertown-tunnel-pollution-study-results/>

³ <http://www.silvertowntunnel.co.uk/pollution/2015-no-to-silvertown-tunnel-pollution-study-results/>

⁴ Paragraphs 1.2.2 to 1.2.27, TR010021-000664, No to Silvertown Tunnel Written Representation <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010021/TR010021-000664-No%20to%20Silvertown%20Tunnel.pdf>

⁵ Paragraph 6.4.16, TR010021-000472, Environmental Statement, Chapter 6 - Air Quality <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010021/TR010021-000472-Transport%20for%20London%20-%20Chapter%206%20Air%20Quality.pdf>



Image 2-1: Our Bramshot Avenue tube was placed on the lamp post on the right of the photo. The subway entrance is on the left, while Siebert Road is directly behind the A102.

3. The Royal Borough of Greenwich's air quality studies

3.1. We chose Bramshot Avenue because the Royal Borough of Greenwich carries out regular monitoring in Siebert Road itself. It uses a lamp post just south of the subway entrance.

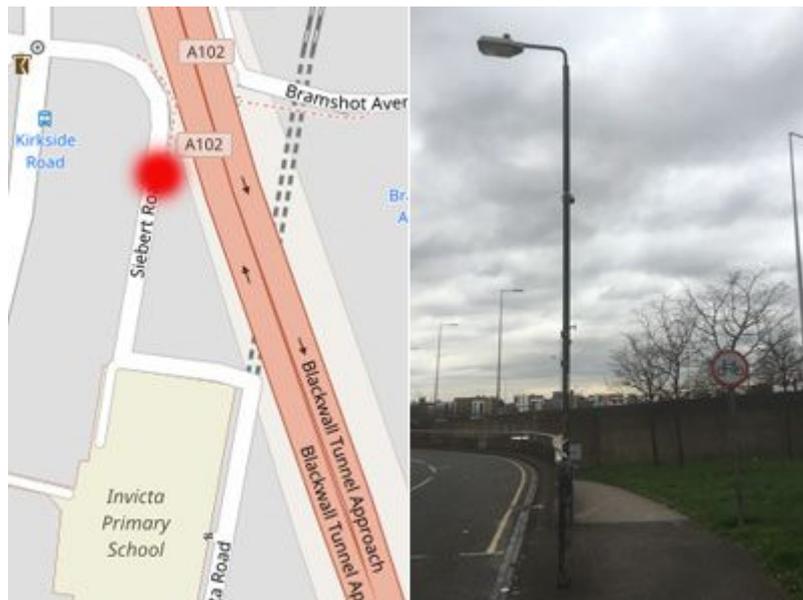


Image 3-1: This lamp post hosts The Royal Borough of Greenwich's diffusion tube for Siebert Road. The subway entrance is at the foot of the slope.

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3.2. The specific figure for January 2014 at this site was $44.79\mu\text{g}/\text{m}^3$, reflecting the tube's position further away from the A102⁶.

3.3. For the whole of 2014⁷, the annual mean concentration of nitrogen dioxide at this site was $42.7\mu\text{g}/\text{m}^3$, and in 2015 it was $41.5\mu\text{g}/\text{m}^3$.

3.4. We have no disagreement or quarrel with Greenwich's figures. However, we feel that our Bramshot Avenue figure is valid as an indication of the pollution levels that can affect properties adjacent to the A102 such as those in Siebert Road and Westcombe Hill. If the Silvertown Tunnel leads to more traffic using the A102, as we believe it will, then these levels are likely to worsen.

3.5. We hope this submission, which we have shared with Rebecca Moore, explains the disparity between the two locations and the context in which our study in this area was carried out.

⁶ We obtained this monthly data from the Royal Borough of Greenwich, it is not publicly available on its website to the best of our knowledge.

<http://www.silvertowntunnel.co.uk/wp-content/uploads/2017/03/JAN14MAPDATA2014NOXDT.xlsx>

⁷ Royal Borough of Greenwich, Air Quality Annual Status Report for 2015, contains annual mean figures for both years. Siebert Road is site GW23.

http://www.royalgreenwich.gov.uk/downloads/file/3104/air_quality_annual_status_report_2015