

# **No to Silvertown Tunnel [SILV-227]**

## **Deadline 7 Written Representation to the Planning Inspectorate**

**10 April 2017**

### **1. Introduction**

1.1. No to Silvertown Tunnel welcomes the opportunity to make our final written representation. We have participated throughout the Silvertown Tunnel public examination, contributing at hearings where we feel our input would be relevant. For convenience, here is a list of our past written representations, as they appear in the Document Library.

RR-193 **Relevant Representation**

AS-012 **Response to Rule 6**

REP1-059 **Written Representation and Response to Rule 17**

REP2-008 **Submission for Deadline 2**

REP3-047 **Post-Hearing Submission**

REP5-020 **Submission for Deadline 5**

REP6-005 **Post-Hearing Submission**

REP6-006 **Further Post-Hearing Submission**

1.2. We would like to record our thanks to the Examining Authority for their rigour in pursuing this examination and their patience and good humour at hearings. We would also like to thank the Planning Inspectorate's case team for the generous assistance they have given us and other community groups in contributing to this process.

1.3. We remain opposed to the Scheme. Nothing we have heard during the past six months has altered our belief that this proposal represents a high risk to local communities and the environment.

1.4. In fact, this examination has alerted us to risks we had not previously considered, such as those brought forward by the Health & Safety Executive [REP6-007].

### **2. Mayoral Direction MD-212**

2.1. We are concerned that the Mayor of London, Sadiq Khan - who is also chairman of Transport for London - has signed off a Mayoral Direction concerning land near the proposed tunnel's northern portal which appears to claim the Scheme has already been approved.

2.2. Mayoral Decision MD-212<sup>1</sup> claims in paragraph 1.2 that a river crossing "has now recently been confirmed via the Silvertown Tunnel Development Consent Order". The executive summary also claims the tunnel has been "recently confirmed".

2.3. It is unfortunate that that a report from the Mayor treats this process as one that has already been settled.

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<sup>1</sup> <https://www.london.gov.uk/decisions/md2102-thameside-west-preparing-development>

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#### 3. Air quality impacts

3.1. We remain concerned that the Applicant is not taking the issue of air quality as seriously as it could. We note that it remains in disagreement with Lewisham<sup>2</sup> and Hackney<sup>3</sup> Councils on the question of air quality monitoring in parts of those boroughs that will be affected by the scheme, even though this would be a relatively low-cost commitment to make.

3.2. The Applicant is unable to guarantee that the Blackwall Tunnel and the proposed Silvertown Tunnel and their approach roads will be included in the expanded Ultra Low Emissions Zone (ULEZ), as proposed by the Mayor. This is in response to our question at Deadline 6 about exemptions being under discussion with Newham Council<sup>4</sup>. We are grateful that the Examining Authority has issued a Rule 17 letter for more information from the Applicant.

3.2.1. The Applicant has attempted to treat the two proposals as being entirely unlinked. The Assessed Case does not include the ULEZ proposal. However, local communities have been told that air quality impacts will not be severe due to ULEZ covering the Silvertown Tunnel scheme. A true picture of the Silvertown Tunnel scheme's effects would show the two different schemes - Silvertown Tunnel and ULEZ - working together. This should include traffic displacements - such as via the South Circular Road - owing to the operation of ULEZ.

3.3. We note from the latest Monitoring & Mitigation Study [REP6-068] that the Applicant plans to appoint "a firm of experts" to assess air quality impacts and whether they require mitigation, rather than employing a simple set of triggers for mitigation. We share the concerns of Lewisham Council about impartiality<sup>5</sup>.

3.4. The Applicant says "just relying on air quality data will not differentiate between effects resulting from the Scheme and those arising from other, unrelated activities". We continue to hold that the scope of issues mitigated by the Scheme cannot be limited to those caused by the Scheme<sup>6</sup>. It is therefore unnecessary to discern whether air quality impacts have been caused by operation of the scheme: the question is whether a mitigating action, as foreseen in the Traffic Impact Monitoring Strategy or the Monitoring & Mitigation Strategy, is required, whatever is causing it.

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<sup>2</sup> REP6-025 LB Lewisham Deadline 6 submission - paragraph 5.2

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010021/TR010021-001658-LB%20Lewisham%20Deadline%206%20submission%20LBL%2014.pdf>

<sup>3</sup> REP6-026 LB Hackney Deadline 6 submission - page 2

[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010021/TR010021-001667-LB\\_Hackney\\_Deadline\\_6\\_Submission.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010021/TR010021-001667-LB_Hackney_Deadline_6_Submission.pdf)

<sup>4</sup> REP6-06, No to Silvertown Tunnel Further Post Hearing Submission, paragraph 1

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010021/TR010021-001670-No%20to%20Silvertown%20Tunnel%202.pdf>

<sup>5</sup> REP6-025 LB Lewisham Deadline 6 submission, as above, paragraph 5.10

<sup>6</sup> REP3-047, No to Silvertown Tunnel Post-Hearing Submission, part 1

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010021/TR010021-001235-No%20to%20Silvertown%20Tunnel.pdf>

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### **4. This is not the scheme promised in the Assessed Case**

4.1. Throughout this process, the Applicant has been at pains to suggest its Assessed Case is based on rigorous modelling and analysis. But during the course of the examination, many changes have been suggested to the Scheme, but without similarly rigorous examination or modelling to see how these would affect the Assessed Case. These include changes to planned bus networks, user charge exemptions for drivers on low incomes, and the Applicant neglecting to include overheight vehicles (those that are too tall to use the northbound Blackwall Tunnel) in its original modelling.

4.2. We believe these changes have made it even more likely that this Scheme will have negative outcomes for the communities who will have to live alongside it and the already-congested roads that lead to it.