

**From:** [Crew, Sally](#)  
**To:** [silvertowntunnel](#)  
**Cc:** [Gillott, Alexander](#); [Legassick, Bill](#)  
**Subject:** LB Southwark - UK Plan for tackling roadside  
**Date:** 23 August 2017 11:58:56

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Dear Sir/Madam,

The London Borough of Southwark (LB Southwark) has been involved throughout the examination of Silvertown Tunnel. This includes submitting representations at each deadline and attending and making oral submissions at several Issue Specific Hearings. Through our representations, LB Southwark has stated that TfL has failed to address the borough's valid air quality concerns, and expressly that the Silvertown Tunnel, as proposed, will worsen air quality in the borough.

LB Southwark maintains that the use of DMRB and IAN screening and the significance criteria is not a robust or reasonable approach to take in the assessment of air quality. Through the examination, LB Southwark raised concerns as to the methodology used to model traffic and the translation of this information to assess air quality. As such, LB Southwark maintain the air quality benefits of Silvertown Tunnel have been overestimated. The traffic modelling provided by TfL throughout the examination shows an increase in vehicular traffic through the borough. The UK Air Quality Plan expects each local authority to delivery air quality mitigation measures to ensure the UK is compliant with the EU Air Quality Directive limit values as soon as possible. With an increase in vehicular traffic and a lack of proposed mitigation along the A200 corridor within Southwark, Silvertown Tunnel is likely to make this more challenging and move the borough further away from being able to meet its obligations contained within the UK Air Quality Plan. As such, LB Southwark believe the representations that it has made throughout the examination process should be reviewed and given additional weight in light of the publication of the UK Air Quality Plan; in particular with reference as to whether or not the scheme is appropriate, whether or not it will deliver a clear benefit and whether or not the proposed mitigation is sufficient (and has the ability) to remedy any harm caused at a borough level.

One of the key actions within the UK Air Quality Plan is for DVSA to introduce "lorry emissions technology checks at the roadside". It should therefore be considered whether such checks can be undertaken as part of the proposed Silvertown Tunnel road layout. If not, it should be considered whether or not an obligation should be imposed on TfL to carry this out elsewhere within the vicinity of the tunnel or to amend the scheme to accommodate this.

Should you seek any further information or clarification to the information provided above, I would be happy to assist.

Kind regards,

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