



17 November 2017

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Dear Natasha

Planning Act 2008
Application by Transport for London for an Order granting Development Consent for the Silvertown Tunnel

We write in response to your letter of 14 November.

The purpose of this letter is to explain why the deadline that has been set for the submission of further air quality information is not achievable.

Your letter requests that TfL:

- updates the air quality assessment for the Silvertown Tunnel application based on the latest available emissions evidence and modelling tools;
- provides an update to its assessment of the impact the proposed Silvertown Tunnel development would have on meeting the proposals in the Zone Plan for Greater London Urban Area; and
- provides details of any further mitigation measures considered necessary to address any significant impacts on air quality that the proposed Silvertown Tunnel development would have on meeting the proposals in the Zone Plan for Greater London Urban Area.

Your letter sets a deadline of 13 December 2017 for the submission of the above information.

This deadline is not achievable as it does not allow sufficient time for the models to be re-built and re-run. Furthermore, additional technical information and guidance is required from Defra and Highways England before the modelling can be updated using the new emissions factor toolkit. These two issues are described in more detail below.

Modelling a base year of 2012

The updated emissions factor toolkit (EFT version 8) which was issued by the Government on 13 November 2017 has been rebased to 2015. Emissions from the tool can therefore be generated for each year between 2015 and 2030. All the tools that accompany the EFT v.8 are also based from 2015.

The air quality assessment for the Silvertown Tunnel uses a base year of 2012. Defra has not yet issued advice to users on how to remodel base years earlier than 2015 using the new EFT. TfL has written to Defra to request that this advice is issued as a matter of urgency.

The base year is important in the assessment as it is the means by which the air quality model is verified and adjusted against actual air quality monitoring data. It is not possible to rely on the previous Defra modelling for 2012, as the emission factors are likely to have changed for that year. Accordingly, in order for TfL to update the air quality assessment it will be necessary to backcast the new tools to 2012. To do this, TfL requires advice from Defra on how to undertake a modelling assessment utilising the updated tools for 2012.

Until Defra issues this advice, TfL cannot use EFT v.8 to generate emissions or process modelled results for a base year of 2012.

Speed banded emission factors

TfL's air quality assessment utilised the speed banded emissions in accordance with Highways England's Interim Advice Note 185/15. Highways England has not yet issued the equivalent speed banded emissions based on EFT v.8.

Until these are issued, TfL is not able to update the air quality assessment on a basis that is consistent with the methodology previously used. TfL has written to Highways England to request this speed banding information as a matter of urgency.

Programme for undertaking updated assessment

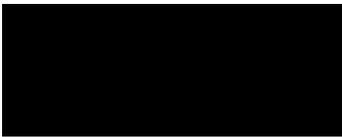
Given the complexity of the air quality modelling process, delivery of the updated information requested in your letter of 14 November will take approximately 12 working weeks from the issue of the technical information and guidance from Defra and Highways England explained above. This is the shortest time that is reasonably necessary to produce the requested information which requires the following tasks to be undertaken:

1. Re-build the air quality models.

2. Run the air quality models.
3. Quality assure and quality control the models.
4. Process the modelled files.
5. Undertake the assessments that feed into determining whether the scheme has an impact on compliance with the Air Quality Directive or leads to a significant impact on local air quality (in accordance with IAN 174/13 and IAN 175/13).
6. Update the reports with the results.

To ensure the updated modelling can be carried out as quickly as possible, TfL has asked Defra and Highways England to supply the technical information and guidance mentioned above as a matter of urgency. As soon as this technical information and guidance has been received TfL will immediately commence the modelling and assessment work and will confirm this with the DfT.

Yours sincerely



David Rowe
Head of Major Projects Sponsorship