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12<sup>th</sup> March 2018

Dear Ms Kopala

**RE: Planning Act 2008 (as amended) Application by Transport for London (TfL) (“the Applicant”) for an Order granting Development Consent for the Silvertown Tunnel**

**Royal Borough of Greenwich comments on the proposed Silvertown Tunnel updated Air Quality Assessment.**

This response relates to the proposed Silvertown Tunnel development. An updated Air Quality Assessment (the Report), dated 19<sup>th</sup> February 2018 has been submitted by the Applicant together with supporting Emission Factor Toolkit v8 Drawings. These documents are published on the Silvertown Tunnel project page of the National Infrastructure Planning website.

The Secretary of State (DfT) has invited comments on these submissions from the interested parties. This letter constitutes the Royal Borough’s formal response to the Secretary of State’s request.

The Royal Borough accepts and supports the need for modal shift through a focus on public transport improvements but also recognises that East London is disadvantaged by the lack of river crossings compared with West London and that this inhibits orbital movement. Even with significant modal shift there will remain a need for cross river vehicular movement. This can be managed without detriment to other policy aims by the provision of local (charged) vehicular crossings.

A package of river crossings is necessary to address the severance caused by the Thames and support the development of the Royal Borough. This package should include: a fixed road and rail link at Gallions Reach; DLR extension to Thamesmead and beyond; an appropriate mass transit system to support growth and development in Charlton Riverside; and London Overground expansion to Abbey Wood. It is essential that the Mayor demonstrates continued commitment to progressing a package of road and public transport

based river crossings. This must include clarity on the mechanisms and timescales for progressing them.

## **Updated Air Quality Assessment**

The Report was commissioned by Transport for London (TfL) in response to a Department for Transport (DfT) letter, dated 14<sup>th</sup> November 2017, in which the Secretary of State (DfT) requests:

*‘that the applicant: updates the air quality assessment relating to the above 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 the Greater London Urban area and; provide 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 the Greater London Urban area.’*

This request followed the release of updated air quality modelling tools, including the Emission Factor Toolkit (EFT) Version 8 by the Department for Environment Food and Rural Affairs (Defra) on 13<sup>th</sup> November 2017. The previous assessment was undertaken in December 2016, utilising the latest emission factors available at the time, which included the Emission Factor Toolkit (EFT) Version 7 (referred to as ‘the December 2016 Assessment’).

The Report states (Para 1.1.7) that TfL have re-run the 2012 base year assessment using information provided by Defra’s consultants to verify the air quality model, ‘...and allow predictions of the 2021 ‘with’ and ‘without’ Scheme scenarios to be generated’.

The Report confirms the latest air quality modelling tools, published by Defra in November 2017, have now been used. The updated assessment is now referred to as, ‘the Updated EFT v8 Assessment’ (EFT v8.0.1).

## **Outcomes**

The updated assessment identifies that 40 out of 54 receptors predicted concentrations have been identified as being within 1% of each other (comparing the December 2016 assessment and the updated EFT v8.0.1 assessment).

The Report (Para 2.4.5) confirms that 44 out of the 54 receptors modelled will continue to exceed the annual mean air quality objectives, which is the same for both assessments. Using EFT v8.0.1 for the 2021 Reference and Assessment Cases (depicted in Appendix B, Table B2) the modelled annual mean for NO<sub>2</sub> is predicted to be on average 6.5 µg/m<sup>3</sup> lower than previously predicted, across the 54 receptor locations modelled (Para 2.5.2). This supports TfL’s assertion that the December 2016 Assessment would provide conservative predictions.

The Report (Para 3.1.13) identifies that only one Pollution Climate Mapping (PCM) link south of the scheme on the A102 Blackwell Tunnel Southern Approach will experience a deterioration in air quality as a result of the scheme. In mitigation the Report (Para 3.1.18) re-iterates the committed actions proposed in the Greater London Urban Area Air Quality Plan, for tackling roadside nitrogen dioxide concentrations.

The Report states that the Silvertown Tunnel Scheme would not impact on the delivery of any of the following proposed TfL air quality actions in London:

- *‘Introduction of Toxicity Charge on top of the existing Congestion Charge;*
- *Launching the Ultra-Low Emission Zone;*
- *Spending more than £300 million on transforming London’s bus fleet;*
- *Ensuring TfL no longer issues licences to new diesel taxis;*
- *Introducing five Low Emission Neighbourhoods;*
- *Providing alerts to Londoners during high and very high pollution episodes;*
- *Delivering air quality audits at 50 primary schools;*
- *Reducing emissions from construction and new developments by implementing a Non-Road Mobile Machinery Low Emission Zone and tightening air quality requirements within the forthcoming London Plan;*
- *Reducing building emissions.’*

The Report states that the Scheme is deemed to be of ‘Low Risk’ to meeting the proposals in the latest Defra Air Quality Plan for tackling roadside NO<sub>2</sub> concentrations in the Greater London Urban area (published July 2017). This applies to both the ‘Baseline’ projections (which assume no improvement measures) and the ‘With Clean Air Zone’ projections (which include the proposals above).

The Report concludes that ‘Overall, the Scheme results in an improvement in air quality in areas of highest pollutant concentrations...’ (Para 3.1.19), and ‘the same conclusions have been reached in the updated EFTv8 Assessment as were reached in the December 2016 Assessment’ (Para 5.1.4).

‘The Applicant has committed to carry out a further air quality assessment before the Silvertown Tunnel opens for public use...’ (Para 5.1.10), and ‘After the tunnel has opened to traffic, an extensive air quality monitoring and mitigation regime will operate’ (Para 5.1.11).

This will ‘...be reviewed by a firm of independent experts’ and a scheme of further mitigation will be submitted to the Mayor for approval ‘if the firm of experts conclude that the Scheme has materially worsened air quality’ (Para 5.1.11).

The Royal Borough of Greenwich recognises the need to improve London’s air quality. Air pollution contributes to thousands of early deaths each year and impacts our health over the course of our lives. It also exacerbates inequalities by particularly affecting the most vulnerable groups in society. The Royal Borough of Greenwich is ranked as the 14<sup>th</sup> most affected London borough from health effects associated with poor air quality. The Royal Borough of Greenwich supports measures which aim to improve air quality across London.

The updated air quality assessment verifies the conclusions of previously submitted assessments, and makes no significant alteration to previously proposed air quality monitoring and mitigation strategies.

It is not possible to independently verify the Defra model for the updated air quality assessment, as model input parameters have not been provided.

The results showing predicted air quality in 2021 must be treated with caution, as the results are reliant on accurate road traffic forecasts, relating to the volume of use of the proposed development. There is significant regeneration and redevelopment on and around the Greenwich Peninsula. The O2 and associated development is becoming an ever-increasingly popular destination point for residents, businesses and visitors to London. If the predicted road traffic forecasts in this rapidly developing part of London have been underestimated, and are over optimistic, the detrimental impact on local air quality is equally likely to have been underestimated.

Further, although there are good reasons to expect that future vehicles will have reduced polluting emissions, the scale of reduced NOx emissions is unknown. If local road traffic becomes congested, and vehicles are forced to queue, idling for significant periods above forecast levels, this is also likely to increase the detrimental impact on local air quality above predicted levels.

As the updated air quality assessment verifies the conclusions of previously submitted assessments, the Royal Borough's previous comments remain relevant. It is vital that the further assessment required before the Tunnel opens for public use is robust and considers the rapid development of the area (with accompanying impacts on travel patterns) and in the vehicle fleet. The uncertainty around road traffic forecasts also increases the importance of defining and agreeing a Sustainable Transport Fund in the event that actual emissions exceed modelled predictions. The Royal Borough also wishes to remind the Secretary of State of the outstanding matters that are not agreed by the Council. These matters are outlined in the Royal Borough's response of 14 August 2017 and bear relevance in considering the Updated Air Quality Assessment.

Yours sincerely,

A black rectangular box redacting the signature of Ryan Bunce.

Ryan Bunce  
Transport Strategy Manager

Strategic Transportation  
The Royal Borough of Greenwich