



**Jane Sherwood**  
 Director of Regeneration & Planning

1<sup>st</sup> Floor, West Wing  
 Newham Dockside  
 1000 Dockside Road  
 London  
 E16 2QU

Natasha Kopala  
 Great Minster House  
 33 Horseferry Road  
 London, SW1 4DR

PINS Ref: TR010021  
 LBN Ref: 16/02991/DCO

Date: 19<sup>th</sup> March 2018

C/O The Planning Inspectorate  
 Email: [Silvertowntunnel@pins.gsi.gov.uk](mailto:Silvertowntunnel@pins.gsi.gov.uk)

**RE: Application by Transport for London (TfL) (“the Applicant”) for an Order granting Development Consent for the proposed Silvertown Tunnel including user charging on the Blackwell Tunnel (“the Scheme”)**

Dear Ms Kopala,

I write in reply to your letter dated 26<sup>th</sup> February 2018, requesting responses from Interested Parties to the Applicant’s submission of further information relating to Air Quality (dated 19<sup>th</sup> February 2018). The London Borough of Newham has considered this response and makes the following observations:

The effect of the new modelling tool is to reduce the absolute levels predicted through the scheme, shown in Table 2.1 of TfL’s response, copied below.

**Table 2-1 Hoola Receptor (R51) Ground Floor Level (1.5m) Modelled Concentrations Reference Case and Assessed Case**

	December 2016 Assessment			Updated EFTv8 Assessment		
	Reference Case Modelled Annual Mean NO <sub>2</sub> (µg/m <sup>3</sup> ) 2021	Assessed Case Annual Mean NO <sub>2</sub> (µg/m <sup>3</sup> ) 2021	Change (Assessed Case – Reference Case)	Reference Case Modelled Annual Mean NO <sub>2</sub> (µg/m <sup>3</sup> ) 2021	Assessed Case Annual Mean NO <sub>2</sub> (µg/m <sup>3</sup> ) 2021	Change (Assessed Case – Reference Case)
<b>Hoola (R51)</b>	38.0	45.4	7.4	31.1	37.8	6.7

As outlined within Table 2-1, the Updated EFTv8 Assessment now predicts the Assessed Case Annual Mean NO<sub>2</sub> Levels to meet Air Quality Strategy Objectives (“Objectives”), having a value of less than 40 µg/m<sup>3</sup>. It is important to note however, that this is primarily driven by the Reference Case Modelled Annual Mean NO<sub>2</sub> being less than the December 2016 Assessment (by 6.9 µg/m<sup>3</sup>).

The relative changes (Assessed Case – Reference Case) in both models are very similar, which is important when considering the impact of the scheme and the growing evidence of no threshold for

the health effects of nitrogen dioxide. In any event, while it is noted that the Updated EFTv8 Assessment predicts levels to meet Objectives, the value predicted remains close to Objective values.

Mindful of concerns raised by the London Borough of Newham throughout the Examination as to the uncertainties in traffic modelling, and recognising the sensitivity of the models to relatively small changes, concerns remain as to the air quality impact in the area of the Hoola development.

Notwithstanding the Applicant's commitment (through the Monitoring & Mitigation Strategy) to update the traffic modelling prior to scheme opening, the London Borough of Newham (through REP7-004) has highlighted that the scope of re-modelling is inadequate, due to its failure to undertake stated preference surveys to determine appropriate values of time. The lack of any validation in this respect was also a key concern in the evaluation of the Assessed Case modelling. Accordingly, the London Borough of Newham has little confidence in the ability of the user charge to manage traffic flows as predicted, and therefore the appropriateness of the use of this data to inform air quality assessments is called into question.

Ultimately, the London Borough of Newham does not share the Applicant's confidence in these results, and remains of the view that a scheme of ventilation at the Hoola building would represent an appropriate and proportionate mitigation of the air quality impacts of the Scheme to residents of the London Borough of Newham. Justification for this position was provided on numerous occasions throughout the Examination process, and in this regard I would direct your attention to the London Borough of Newham's submission dated 14th September 2017, which presented a mechanism for how this mitigation might be secured.

This correspondence is considered by the Council to be both "important" and "relevant" pursuant to the determination of the Secretary of State under the Planning Act 2008 (as amended).

Yours sincerely,

A solid black rectangular box redacting the signature of Amanda Reid.

Amanda Reid  
Head of Planning and Development