



THE WESTCOMBE SOCIETY

serving the Westcombe Park community

Please reply to: Westcombe Society Environment Committee,
C/o 96 Coleraine Road, LONDON SE3 7NZ
environment@westcombesociety.org

November 15, 2016

The Planning Inspectorate
3D Eagle
Temple Quay House
2 The Square Bristol, BS1 6PN

Re Silvertown Tunnel. Interested Party SILV – 411.

The Westcombe Society is an independent amenity group serving Westcombe Park. Founded in 1973, it aims to work with the community to make the area a better place to live and work in. Our boundaries are the Greenwich rail line (north), Vanbrugh Park/Charlton Road (south), Maze Hill (west), and the A102 Blackwall Tunnel Southern Approach (east). We run events, support local charities, make representations on environmental matters and work with other local amenity groups in the area. Our free monthly newspaper, written, edited and distributed by volunteers, is delivered to 3800 homes, libraries, and some shops.

Proximity to the A102 means we are keenly aware of the Silvertown Tunnel proposals. Our views are formed in consultation with local residents (through public meetings), ward councillors and our MP. We have also met TfL several times to discuss the proposal and its impacts.

The Westcombe Society **objects** to the proposed Silvertown Tunnel.

Charges and Economic Impact

Many of our residents and local businesses use the Blackwall Tunnel, and we are very aware of current congestion and that over-height vehicles regularly try to enter the Tunnel despite north-bound restrictions. This, and the uncertain queuing time drivers endure to use the Blackwall Tunnel, is indicative of demand for the crossing. Yet, we have not seen evidence for how that demand translates into the monetary value that drivers would be willing to pay. TfL argue that charging for the crossing would ensure traffic remained at current levels. However, we believe that TfL's indicative charges will be

insufficient to deter extra traffic, given demand. This is particularly the case with commuter coaches, which will not be subject to charges.

We also believe that locals would suffer unfairly compared to those in other parts of London:

- As the only charged crossing on the Thames apart from Dartford, locals would be disadvantaged in relation to all areas to the west.
- The proposed charging structure will work against those based south of the Thames due to higher charges north-bound in the morning and south-bound in the evening peak periods. Contrary to claims by TfL that the proposed tunnel would give access to thousands of jobs on the north side of the Thames, we feel that tidal flow charging does nothing to improve the 'barrier effect' of the river.

Local jobs are decreasing in relation to the number of homes being built e.g. Charlton Riverside, a designated 'opportunity area', where businesses are having to close or move as developers buy property to create large residential communities¹.

Therefore, we believe that the economic disadvantages would outweigh the benefits for local businesses and residents though we agree that charging is the only available means for controlling traffic levels. **With or without charging our area is facing unwelcome effects if the Silvertown Tunnel is built.**

If the development proceeds we therefore ask **as representatives of regular users to be included as consultees on changes to the charges**, as laid out in the Draft Development Consent Order, paragraph 52.²

Traffic Impacts

We are not convinced that TfL has taken full account of the probability that local traffic patterns will be disrupted.

One key concern is that the A2 southbound is already prone to congestion from the A206 Woolwich Road flyover through to Kidbrooke and Eltham during the evening peak period. If TfL's traffic modeling is incorrect, then this problem could increase, causing residents to suffer even more.

TfL argues that the scheme will not induce traffic because of '(1) a powerful demand management tool in the form of a user charge; (2) a public transport improvement in the form of dedicated HGV and bus lanes which will accommodate improved cross-river bus connections in the local area; and (3) the Scheme is being built in a congested urban environment where capacity is constrained on the surrounding network.'³ However, the

¹ Royal Borough of Greenwich:

http://www.royalgreenwich.gov.uk/info/200079/regeneration/1822/charlton_riverside_regeneration

² TR010021/TR010021-000163-3.1 Draft Development Consent Order, para 52, Charging Policy

³ TR010021/TR010021-000222-6.5 Transport Assessment Appendices, B.3.1

prospect of a free-flowing crossing – even if charged – is likely to attract vehicles from other areas, including the Dartford Crossing, and other drivers are likely to reconfigure their routes to find an uncharged crossing. TfL has argued that the two effects would cancel each other out, in terms of effects on adjacent crossings, but this does not take account of the added congestion as drivers cross each other's paths. This will inevitably affect junctions between river crossings. In particular, we are concerned about the Maritime Greenwich World Heritage Site, which is already subject to heavy flows of traffic at peak times. Our area includes some of the buffer zone for the Heritage Site and a number of connection routes between major roads e.g. Maze Hill, Vanbrugh Hill and Westcombe Hill. While changed journeys may not be true induced traffic, **TfL's optimism about demand management is misplaced. We also feel that modelling needs to include all proposed river crossings.**

A further concern is that we will see drivers entering our area to park and wait for off-peak charging to begin, adding to congestion on local roads. We question whether TfL has considered how to monitor or mitigate this potential time-shift problem.

All in all we feel that TfL could increase the resilience of the current Blackwall Tunnel and that insufficient consideration has been given to reducing overall demand for this crossing which runs through predominately residential areas.

Monitoring and Mitigation

Although TfL's traffic monitoring covers the area well, we would like to see the heavily used A2213 Kidbrooke Park Road link between the A20 and A2 included.

Air quality monitoring is woefully inadequate. TfL proposes to monitor only a narrow corridor around the 'affected roads' picked out by their traffic modelling.⁴ However, this takes no account of the possibility that their traffic modeling may not correctly predict the effects of the scheme. We ask that other obvious points where traffic effects could affect air quality be included i.e. Trafalgar Road, Shooters Hill Road, Blackwall Lane, the A2 through to the Danson Interchange, Woolwich Road between the Woolwich Flyover and Woolwich, Greenwich Town Centre, and Blackheath Hill. In addition, TfL ought to supply a map of sensitive receptors, such as schools, and show how they plan to monitor these for changes to air quality.

Noise monitoring is also inadequate, extending only just metres beyond the order limits⁵. This is unacceptable, given that the proposed tunnel would be both accessible to heavy HGVs north-bound and free to use for coaches. TfL predicts these will be moving faster at peak times. Faster, heavier vehicles make more noise but the plan does not even include the full extent of the 'affected roads', and fails to take account of a number of sensitive receptors locally, including many schools.

We welcome plans to erect much needed noise barriers along the west side of the A102 from the Charlton Road bridge to the rail bridge on Westcombe Hill but fear these will

⁴ TR010021/TR010021-000166-6 ES Figures Drawings 4.1_6.1-6.2

⁵ TR010021/TR010021-000233-7.6 Monitoring Strategy Appendix A-3

only be built if the scheme is consented. See Appendix A for TfL's provisional plans and email regarding this. We believe that this should be monitored for noise (alongside the plans to monitor air quality already proposed by TfL).

We also welcome the supervision of the Silvertown Tunnel Implementation Group (STIG), and **strongly urge** that it both **continue well beyond the planned five years of monitoring AND include local residents** who can often provide additional information not picked up in regular monitoring.

Construction Impacts

We do not consider construction dust or noise is likely to affect our area but traffic almost certainly will. We note that the Construction Management Plan includes a number of safeguards, including approved construction routes, monitoring of lorry movements, and construction workers' travel plans. It also outlines liaison with key stakeholders, including local residents.⁶

Westcombe Park currently suffers from lorries diverting from the A102 onto local roads to avoid traffic congestion. There is a particular problem in the morning peak, where large tipper lorries from plants based on Greenwich Peninsula cut through via Westcombe Hill and the B210 Vanbrugh Park Road to the A2 Shooters Hill Road on Blackheath to avoid queuing traffic on the A2. They create considerable noise, pollution and congestion, on a key route for buses. Residents of Westcombe Hill and Royal Borough of Greenwich Council officers, have together carried out traffic studies. For this traffic, the only constraints are a 20 mph speed limit, and prohibition on use from 21:00 to 07:00. Both are sometimes breached. **We ask to be included in any consultations and to have access to the proposed 24-hour helpline**, if the scheme goes ahead.

Finally we request an Open Meeting in the Greenwich area so that local residents can express their views.

Westcombe Society Environment Committee
(Emily Norton - Convenor)

⁶ TR010021/TR010021-000469-Transport for London Construction Code of Practice 6.10 chapters 3.1 and 4.1

Appendix A

Diagram of design options for noise barrier on A102 sent to Westcombe Society by Chris Alder, Consultation & Engagement Specialist, Silvertown Tunnel, Transport for London on 11 November 2016

