



# THE WESTCOMBE SOCIETY

serving the Westcombe Park community

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## **Silvertown Tunnel - Interested Party SILV – 411**

### **Westcombe Society submission for Deadline 3**

This is a submission on behalf of the Westcombe Society. It covers in writing the points we made at the Issue Specific Hearings on Tuesday to Thursday 17 to 20 January 2017.

This document also includes our responses to the TfL comments on our written representations.

The Westcombe Society is an amenity society serving the area bounded by Greenwich Park, the Greenwich Railway line, the A102 and Blackheath open space. As well as organising events and supporting local charities we look at environmental matters that affect our residents. We also publish a free monthly newspaper, the Westcombe News, written, edited and distributed by volunteers, which is delivered to 3800 homes.

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 and the Westcombe News), ward councillors and our MP. We have also met TfL several times to discuss the proposal and its impacts.

The concerns we expressed during the recent Issue Specific Hearings with regard to the proposed Silvertown Tunnel are given in writing on the following pages. We have also read and analysed the TfL comments on our previous written representations.

In summary our concerns are about the robustness of modelling, increases in pollution and noise, and the effect of the proposed charging on local people. Because of these we fear that although the proposal may reduce some problems it may also increase others. We also still feel that any new tunnel at Blackwall should be considered as part of a package of new crossings in East London, including other road crossings.

## 1. TfL Modelling

We are very anxious that the TfL modelling is accurate and question in particular whether the modelling is robust enough to take account of behavioural changes.

### 1.1. Consequences of failure robustness of modelling

- 1.1.1. We welcome action point 1 arising from the Issue Specific Hearing on 17.01.2017. Residents are extremely concerned about congestion on roads other than the Blackwall/Silvertown approach roads, caused by traffic rerouting to Blackwall/Silvertown (if there are no queues) and away from Blackwall/Silvertown to avoid tolls. Many local roads are already used as rat runs to avoid queues on the Blackwall Tunnel approach, we fear they will also be used if drivers reroute to avoid tolls. The World Heritage Site in Greenwich is on the route between Blackwall and Rotherhithe. It already suffers from heavy traffic and any increase in traffic in either direction would be a major problem.
- 1.1.2. We fear increased congestion south of and around the Woolwich flyover and the Sun in Sands in the evening peak. This is a problem that already exists and according to TfL forecasts is likely to be significantly worse by 2021. It will clearly get even worse if traffic flow increases further due to improved southbound flow through the Blackwall/Silvertown crossing if the Silvertown Tunnel is built. In their response to questions at the hearing on 17.01.2017 TfL seemed to recognise the problem but their answer was that they will take measures to mitigate this in advance. However, we we have been unable to find the information that tells us what form this mitigation will take or any written undertaking to do anything in advance. In TfL document 8.39 *Comments on Written Representations* TfL answer us by referring us via their response to RB Greenwich to the *RB Greenwich Written Submission* which expresses the same concerns.

### 1.2. Illustrations of our concerns with regard to modelling

- 1.2.1. At the hearing on 7 December 2016 TfL gave the following (page 13 TfL document 8.29 *Written Summary for Traffic and Transport modelling*) as reasons not to model trip frequency:

*“Trip frequency is not modelled within LoRDM, i.e. trip rates are assumed to be fixed as it is believed that the trip frequency demand response to the Silvertown tunnel scheme would be very small for the following reasons:*

- *LoRDM explicitly considers active modes, which means that trip frequency does not need to be modelled. Webtag’s recommendation to include frequency responses as a proxy mechanism for the transfer between the active modes and the mechanised modes.*
- *Evidence from the London Travel Demand Survey suggests that trip rates and therefore overall levels of trip making are stable*

- *This scheme involves user charging which offsets to varying degrees the time savings offered by the new crossing, further reducing the likelihood of a significant 'true induced traffic' impact."*

We question these statements as follows:

- 1.2.1.1. The Westcombe Society would like further clarification as to why consideration of 'active modes' might mean that trip frequency does not need to be modelled.
- 1.2.1.2. TfL's modelling and their justification for the Silvertown proposals say that overall traffic levels are continually increasing in East London which presumably means more trips. This contradicts the statement that "*Evidence from the London Travel Demand Survey suggests that trip rates and therefore overall levels of trip making are stable*"
- 1.2.1.3. TfL seem to be sure that user charging will offset the time saving of the proposed new crossing and therefore any increase in traffic due to induced traffic. After reading TfL document 8.44 *Silvertown Modelling – Value of Time Discussion Note* we are not convinced that standard modelling methods are robust enough for this situation, due to the lack of alternative routes available for many journeys between southeast and northeast London. (In comparison when routes such as the M6 toll were modelled, multiple alternative routes were available, including the existing non-tolled motorway which would, in theory, be less congested due to the additional toll road.) In the Silvertown case, the option to use the existing route without toll will not exist so the only alternative routes will be on already heavily congested routes through metropolitan suburbs to a limited number of alternative river crossings which TfL admit are already at capacity.  
Despite significant public transport improvements, both recently and in the future, many drivers who use the Blackwall crossing now will still have to drive because there will still be no viable alternative unless their origin and destination happen to both lie on one of the new bus routes or on Cross Rail. Indeed in "*6.5 Transport Assessment*" Figs 7.1 & 7.2 and other documents TfL say that there will be negligible change in mode of transport in the ESR and none cross river. We therefore feel this may be a situation where drivers who value their time highly are prepared to pay for the Silvertown crossing whilst drivers who don't value their time divert to cheaper/free crossings increasing congestion on other roads. At the same time others may divert to Silvertown. TfL also say in Fig 7-1 and para 7.2.8 of document "*6.5 Transport Assessment*" that across the ESR the total number of trips made with the scheme in operation would increase very marginally. Even assuming this is the case we have concerns that the predicted transfer to PT with the introduction of buses alone is unrealistic (1.2.3). Even if the predicted reduction in private vehicle trips is the case it is only 1,300 (0.1% of daily demand) and there are still nearly 2.9 million car trips predicted, some of which may change route. Although in numbers those diverting to and from Silvertown may balance out, these vehicles will still be on the roads causing congestion. Has this been modelled?

- 1.2.2. The Westcombe Society also questions how well the modelling can account for human nature and the way humans make decisions. The TfL document “8.52 *Silvertown Modelling - Changes to PT Travel*” document shows in Table 1 a large movement from other modes to buses in numbers but a very small % shift. TfL then goes on to say that the LoRDM represents active travel modes simplistically and doesn’t take into account people’s propensity to walk/cycle for health or lifestyle reasons. Are other travel modes and people’s behavioural changes also treated simplistically? Relative journey times in a car as compared to walking and public transport may be accounted for by use of the ‘value of time’ figures but TfL admit they don’t model lifestyle for active modes. Has the convenience of a car as a door to door service that also carries goods/luggage been considered?
- 1.2.3. With regard to increased capacity for buses through the proposed Silvertown Tunnel we are not convinced that the modelling accurately reflects the number of people who will use these buses. Our observation during the morning peak is that only about 6 people remain on the 108 bus after North Greenwich despite it being full to overflowing on arrival at North Greenwich having missed picking anyone up at the last few stops due to overcrowding. We can only presume that most of those who currently need to cross the river at Blackwall by public transport use the existing underground and change onto buses on the other side. Given the length of time it takes to travel any distance by bus and the new bus transfer fare that reduces the cost of changing bus, we really don’t understand why more bus routes specifically through the Blackwall tunnel justify the huge cost of the proposals. Clearly if the tunnel is to be built there should be a legally binding commitment for TfL to increase bus services through the tunnel. However we feel that what hasn’t been modelled is the option to increase bus services on either side of existing public transport crossings. We hope that this can be added to the additional information requested in Action Point 2 arising from the Issue Specific Hearing on 17.01.2017.
- 1.2.4. We are concerned that many junctions/roads where congestion may worsen if Silvertown is built haven’t been mentioned in the modelling. TfL claim that although increased capacity in the form of the Silvertown Tunnel will lead to increased numbers of vehicles, traffic flows will improve but that is only on the crossing itself. We have already highlighted our concerns with regard to congestion southbound on the A2 (1.1.2). Other roads in our area, such as Trafalgar Road and the A2 westbound through Blackheath, Deptford and onwards, are also already congested. Minor roads such as Maze Hill also suffer congestion and/or rat running on a regular basis. We are not convinced that mitigation by minor changes for which TfL already have powers will be sufficient to mitigate this. We feel that before Silvertown is given the go ahead the following should be modelled at minimum
- Blackheath,
  - Blackheath Hill
  - Lewisham
  - Trafalgar Road
  - minor roads in Westcombe Park itself

- 1.2.5. As we understand it, TfL have produced 'reference case' traffic figures for 2021 based on traffic figures for 2012. We are now over 4 years on from 2012 yet TfL don't seem to propose to compare figures with the 'reference case' model until three years preceding and three years after the opening of the tunnel. Why are they not using the model for the 'reference case' now to produce figures for 2015 and 2016? If they did this then surely they could compare the actual figures with those produced by the model to determine the accuracy of their models before construction starts? In addition traffic will be affected by construction in the 3 years preceding the opening of the proposed tunnel. We therefore welcome Action point 19 arising from the Issue Specific Hearing held on 17.01.2017
- 1.2.6. There was some discussion at the hearing on 17.01.2017 about whether or not it is possible to model the effect of closure of either tunnel. We do not understand why TfL seem to be unwilling to model this using annual daily averages. They should also be modelling the effect on closure of the feeder routes into and out of the tunnels as requested by some present at the hearing.
- 1.2.7. We welcome Action Points 7 and 8 arising from the Issue Specific Hearing held on 17.01.2017 because we fear that some of the models use figures produced by another model. For instance the reference case uses predictions for 2021 based on 2012 figures and these figures may be fed into another model. It is not clear to us what the margin of error is for any of these models and what the overall margin of error therefore is. We are particularly concerned about the robustness of the Air Quality and Noise modelling given that data is fed from the traffic models into these models thus multiplying the margin of error. Although congestion is a major issue in our area it is the damage this does to Air Quality that is of greatest concern. Conversely if traffic flows improve noise is likely to increase as faster traffic produces more noise. Therefore noise is also of great concern in our area. Hence our concern about the modelling of changes to Air Quality and Noise.

### **1.3. Summary of Westcombe Society concerns about TfL modelling for Silvertown**

We welcome the prospect of further details of assignments of routes of concern to the Westcombe Society as stated in the Action Point 4 arising from the Issue Specific Hearing on 17.01.17.

As a voluntary group we have found it difficult to read all the TfL documents but we find that those we have managed to read appear to contradict themselves repeatedly and this leaves us wondering what to believe. Clearly reduced congestion and increased options for crossing the river by public transport is a good thing but, if congestion simply shifts and the predicted change of mode is actually very small, one is left questioning the importance of increased public transport and reduced congestion in one place as a positive factor in favour of the scheme.

In summary we feel that TfL's optimism about demand management is misplaced and we are not convinced that their models accurately reflect the probability or improbability that local

traffic patterns will be disrupted. We also feel their optimism on the benefits of the scheme may not accurately reflect the actual benefits and therefore their cost benefit result in favour of the scheme may be misplaced.

TfL say that our concerns about congestion on other roads (1.1.1.) will be met with mitigation measures.

## **2. Mitigation**

Despite TfL claiming otherwise we still feel that the mitigation is planned to be mainly reactive rather than proactive.

If there is to be mitigation in advance of the tunnel being built we would like to see these plans now as part of the proposals.

We are also very concerned about the number of hurdles that will have to be jumped to justify reactive mitigation. We feel that proving that any increase in congestion on local roads is due to the Silvertown will be almost impossible under the current proposals. In particular the requirement that the number of HGVs reaches a certain level is unfair as some roads affected may well not be routes used by HGVs. We therefore share the concern expressed at the hearing on 17.01.2017 by the representatives of all the local Councils.

## **3. User Charging**

- 3.1.** We feel that charging at one crossing may simply move traffic elsewhere and therefore feel that any charging should be part of a wider scheme.
- 3.2.** The current situation shows how long people are prepared to queue to use the crossing without diverting elsewhere or using other forms of transport. This questions how good the modelling is for charging given that people aren't necessarily rational. TfL admit that other crossings are at capacity so it seems to us that charging will either not act as a deterrent or will increase demand and thus queuing at free crossings. Given the lack of alternatives we don't see how charging will decrease demand overall, it may simply shift congestion.
- 3.3.** Many local people consider the current proposals to be unfair because of the proposed north/south charging differentials. TfL seems to argue that the main economic growth area is on the north side of the river. The current charging proposals will encourage businesses and jobseekers to base themselves north of the river which could have a detrimental economic effect on areas to the south if the south is seen as less attractive area in which to live or base your business as it will be more expensive to base oneself in the south and access customers/jobs in the north than vice versa. TfL argue that there will be significant benefits to the residents of the south London boroughs despite the tidal flow charges. The problem is that this is not the perception of residents who only see the proposal as unfair additional charges being foisted on them.

- 3.4. Many residents are also keen that they should not pay full charges. If there is to be charging then clearly it shouldn't be so low as to increase local use of the crossing. However many local people feel they will be disadvantaged by the current proposals, especially if they are dependent on the crossing. The proposals may also encourage longer journeys to use crossings elsewhere.
- 3.5. Residents also resent the proposal as it stands in that longer distance traffic that only brings pollution and congestion and no benefit to the area, will pay the same as local traffic which has less choice as to where to cross the river. Current proposals mean that the charge will in effect mean a greater percentage increase in journey cost for those who have shorter journeys, which local people see as unfair. The promise of money for public realm improvements and other proposals does not help individuals who are struggling financially and feel this scheme will be yet another cost they have to bear. At the time Blackwall was built this was the edge of the metropolitan area and the tunnel served the docks. Since then London has expanded considerably. When the A12 link was built the Blackwall crossing became an important link between south east and north east London which is of huge benefit to local jobseekers and businesses. However this has the disadvantage that it has at the same time become a longer distance route for through traffic that cuts through inner London residential areas. In 21<sup>st</sup> century London long distance traffic should not be encouraged to use an inner London crossing. Local people feel they will be paying for a route for long distance traffic. Should this be a strategic route in 21C London?
- 3.6. Higher charges for those who don't have an account penalises occasional users and visitors to the area unless they have the option to open an account after they have used the crossing e.g. for the following 24 hour period.
- 3.7. Higher charges for those who don't have an account also penalises those who don't use the internet at all and those who have limited experience of using the internet, fear using credit/debit cards online and or don't possess a debit or credit card. These people are often the elderly or those already marginalised by society and the increasingly digital age.

#### 4. Pollution

##### 4.1. Effect of traffic that diverts towards or away from Blackwall/Silvertown

The Westcombe Society are also concerned about the effect on pollution of traffic that re-routes (1.1.1). Pollution is already a major problem in this area especially around the A206 corridor. **We do not feel it is acceptable to allow an increase in pollution anywhere, even if this means a reduction elsewhere.** Measures need to be taken to avoid any increase in pollution.

The extent of rerouting is particularly difficult to predict, so that the forecasts may be subject to especially large margins of error. Thus everything might just possibly turn out fine, but may also be far worse than anyone expects.

There is, therefore, the real possibility of a very large and extensive impact on air quality around local road networks in residential areas. This means there is a need for far more widespread location of pollution verification points. Currently there are just three (ARC52 to the immediate east of the A102 flyover and ARC51 and ARC49 on the near west). This is wholly inadequate. Given the possible magnitude of the problem, there is a need for many more, spread out across the local road network, e.g. at the bottom of Maze Hill, in Greenwich town centre, Blackheath Hill, Kidbrooke interchange and along the A200. We presume the same would apply north of the river.

#### **4.2. Additional HGVs**

We have managed to find very little in the documents specifically about HGV traffic and how this will compare with other traffic, but are told that the recent study on southbound over height HGVs suggest that the removal of the northbound height limit on HGVs at Blackwall/Silvertown will mean an additional 400 HGVs per day in the northbound direction. We are not certain how this compares with the overall number of HGVs on the route but fear that faster moving traffic, especially faster moving HGVs will increase the overall noise levels. We also wonder what the pollution effect of 400 HGVs a day will be even if they are in theory travelling at speed.

Although strictly speaking out of our area we also wonder how many over height HGVs might wish to use the A12 on the other side and how this will affect the road network north of the river between the two tunnels given that the Silvertown tunnel is not being designed to feed into the A12.

### **5. Noise**

#### **5.1. Siebert Road Barriers**

- 5.1.1. These barriers are long overdue but the map used to plan their siting does not show the school in its new setting i.e. further north and east and therefore closer to the A102 and less shielded by the blocks of flats. We would like the barriers extended to protect the school. We also welcome Action point 9 arising from the issue specific hearing on 18.01.2017 especially as many young children live and attend school in this area.
- 5.1.2. Although TfL have agreed that the barriers be paid for via S106 money, they still claim that the Silvertown Tunnel Development will not in itself increase noise levels sufficiently to warrant barriers. Noise levels are unacceptable at present and have been for a long time. We fear that faster moving traffic including more HGVs, due to the removal of height restrictions, will actually increase noise despite TfL assuring us that it won't. We welcome the Panel's request for more detail on noise, especially in the light of the potential for much higher levels of use by north-bound over height vehicles than had originally been calculated by TfL

- 5.1.3. The TfL consultants have confirmed that the barriers will be in place before construction starts. The Westcombe Society feel this is essential and would like to see this commitment secured by inclusion in the DCO. We are very pleased that RBG supported us in this request at the hearing and hope that this will be included.

## **5.2. Construction Traffic**

Parts of the Westcombe Park area already suffer from construction traffic, in particular Westcombe Park Road and Westcombe Hill. We would like an assurance as part of the DCO that the Construction/Traffic Management Plan is robust enough to protect local roads, which are unsuitable and inappropriate, from Contractors and sub Contractors traffic. We welcome the addition of specific routes for construction traffic but there is a persistent problem of large lorries from sites on the Greenwich Peninsula using local roads in the Westcombe Park area rather than major routes such as the A102, despite specific routes being agreed. This adds noise, congestion, air pollution burdens, and risk of traffic accidents on residential roads. We have been told that Contractors lorries for the proposed Silvertown tunnel will be clearly identifiable so that breaches can be accurately reported and mitigated. We would like to see this noted in the DCO and would also like the DCO to include a ban on construction traffic using residential roads other than those which are also trunk roads.

## **5.3. Noise Monitoring**

We do not accept TfL's statement that noise monitoring at the tunnel portals is sufficient. It is vital that other areas are also monitored as changes in traffic speed and volumes will affect noise levels. In fact many residents fear that those who currently seldom hear the motorway will suffer more from noise in the future if traffic speeds increase. Therefore there is a case for monitoring noise further away from the tunnel and feeder roads themselves.

## **6. STIG:**

We welcome the proposals for STIG but would like to see residents' representatives appointed to it as well as representatives from the local Council. Many aspects of the proposals directly affect those who live nearest to the crossing and they are the only people in a position to know the day to day effect of changes to traffic patterns. They are also the most affected by user charges and other issues to do with the proposals. They should therefore be given permanent representation on STIG. We also feel that the effects of this development are likely to be felt well beyond 3/5 years and request that provision is made in the DCO for extension beyond 5 years. We didn't make any statement to the Issue Specific Hearing on the Draft Development Control Order, 19.01.17, but welcome the Action Point requesting a fuller explanation of STIG, in particular regarding openness and transparency.

**7. Landscaping:**

The Westcombe Society also asked if the Construction Plan or an Ecology Plan will contain plans for longer-term maintenance of landscaping. We would like to see maintenance included in the DCO, including who will be responsible for this, and how it will be funded. Littering in particular is a major problem and also deterioration of planting due to road spray. We would also like to know who will be responsible for scrutinising this, especially after STIG ceases to exist. We welcome the Panel's request for further details on this in Actions arising from the Issue Specific Hearing held on 18.01.17

**8. Construction Liason Group**

The *Code of Construction Practice* has been revised and updated. Para 4.1.4 refers to a Community Liaison Group to include 'representatives from key local groups'. The Westcombe Society would like to be represented on this. We would therefore like the wording to include residents' associations as this will include briefings on construction activities including traffic management. This paragraph also says that the Contractor will develop a programme of community involvement through volunteering and educational activity. We would like the Contractor to consult residents' associations for suggestions for projects that could benefit from their volunteering, e.g. local parks or growing spaces needing support

Westcombe Society Environment Committee

(Emily Norton – Convenor)