



THE WESTCOMBE SOCIETY

serving the Westcombe Park community

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Silvertown Tunnel - Interested Party SILV – 411

Westcombe Society submission for Deadline 6

This is a submission on behalf of the Westcombe Society. It covers in writing the points we made at the Hearings on Tuesday 28 March 2017.

This document is also an addendum to our previous submission at deadline 3, (*170126 WSENV Silvertown submission to PINS ref id no 411 26 Jan 2017*). Many of our concerns have not been addressed so our previous submissions still apply unless changes to our view are specifically mentioned in this document.

As our area is bounded by the A102 (Sun-in-Sands to Greenwich railway line) we are keenly aware of the Silvertown Tunnel proposals and the possible effect on our neighbourhood and the wider area. 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 in advance of this application to discuss the proposal and its impacts so TfL have been aware of our concerns for a long time.

In summary our concerns are still about the robustness of modelling, increases in pollution and noise, and the effect of the proposed charging on local people. Because of these we still fear that although the proposal may reduce some problems it is likely to increase others and as such may have a negative rather than positive affect on our area. 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 still very anxious about the accuracy of the TfL modelling. In particular we don't feel that TfL have yet shown that the modelling is robust enough to take account of behavioural changes.

1.1. Consequences of failure of robustness of modelling

- 1.1.1. Tables 1 – 9 pages 12 to 20 of *TR010021-001485-TfL 8.94 SWQ Traffic and Transportation TT Report* show mode shift and redistribution of Car out-of-work demand by borough with a variety of breakdowns. We are particularly concerned about both vehicles that redistribute to other crossings and vehicles that stay on the same side of the river as a result of the proposals. We also wonder why business traffic has not been considered in these tables.
- 1.1.1.1. Living in an area where local roads are used as rat runs to avoid queues on the A102 we fear they will also be used if drivers reroute to avoid tolls. We know from experience that it takes very little change in traffic flow to clog up junctions near us and although TfL talk about little effect on existing junctions we don't feel that this has been effectively proved especially as business traffic doesn't seem to be included in these tables. Surely rerouting of business traffic in peak periods should be analysed. Additionally, should the models prove inaccurate the effect on local roads and the World Heritage Site in Greenwich could be significant.
- 1.1.1.2. Being on the zone 2/3 boundary with direct bus access to North Greenwich parts of our area already suffer from commuter vehicles whose occupants take advantage of free parking and continue their journeys on public transport and bicycle. Although the Royal Borough of Greenwich are consulting on expanding controlled parking this is a burden for local people and expanding one parking zone only pushes the problem out to the next free parking area. TfL haven't told us where those that are predicted to change their route and stay on one side of the river are going. They say the numbers are too few to worry about. Our fear is that even a small number of vehicles can have a large effect on residential streets especially if they are all switching to public transport so want to park near the transport corridors.
- 1.1.2. Nothing we have seen since the January hearings allays our fears about increased congestion south of and around the Woolwich flyover and the Sun in Sands in the evening peak. As we have already said this is a problem that already exists and according to TfL forecasts is likely to be significantly worse by 2021. If the Silvertown Tunnel is built this is also likely to further increase due to improved southbound flow.

1.2. Buses

- 1.2.1. We welcome the further work that has been done on modelling transfer to buses. However we note that, even if we accept the modelling, this is modelled as a very small proportion of traffic. It seems that much of the transfer predicted is from existing rail services to bus.
- 1.2.2. We also still wonder if consideration has been given to improving bus services to the existing public transport hubs on either side of the river. Table 4 on page 63 of the *TR010021-001485-TfL 8.94 SWQ Traffic and Transportation TT Report* states that many users who use buses in the 'assessed' case use rail in the 'no bus' case.

- 1.2.3. TfL say that the problem with the 108 is the unreliability of the tunnel. Our observation on the south side of the river is that the difficulty is not regularity of the bus but the difficulty of boarding in Westcombe Park in the morning peak due to the number of passengers heading for North Greenwich. The number who actually cross the river on the bus is actually extremely small when compared to those who alight at North Greenwich.
- 1.2.4. The maps, figures and tables in the *TR010021-001485-TfL 8.94 SWQ Traffic and Transportation TT Report* seem to show that, along with the relatively few drivers who will actually transfer to bus, use of the buses will be concentrated in areas that the buses actually serve. This fits with our observations in that currently, despite heavy traffic, residents who don't live near the bus routes on Westcombe Hill often find that they can be through the tunnel in a car, even in the peak, in less time than it takes to walk to the bus stop and wait for a bus. Unless additional bus routes are introduced that serve areas that do not currently have a bus service to Greenwich peninsula, such as the western part of Westcombe Park, use of buses will continue to be mainly by those who can't afford a car, those who can't park at their destination and those who live near the bus routes. If the Silvertown Tunnel is to go ahead we would very much like to see one of the new services linking the parts of Westcombe Park that do not currently have a bus service to Greenwich Peninsula with North Greenwich and the shopping outlets on the peninsula. This in would reduce local car use between Westcombe Park and the peninsula and allow connection to cross river services thus reducing car use cross river.
- 1.2.5. The applicant admits that the modelling does not represent individuals and has limitations but is still confident that benefits occur for those who switch mode (*TR010021-001485-TfL 8.94 SWQ Traffic and Transportation TT Report 2.2.21 and 2.2.22*). We do not feel this is enough to outweigh the disbenefits to others especially in our area.
- 1.2.6. We feel very strongly that other bus services should not be compromised in order to provide cross river services as seems to be suggested by TfL. New bus services should be financed as part of the Silvertown project.

1.3. Illustrations of our concerns with regard to modelling highlighted at Deadline 3

In our submission for deadline 3 dated 26 January 2017 we highlighted a number of specific concerns about the modelling in section 1.2. of our document (*170126 WSENV Silvertown submission to PINS ref id no 411 26 Jan 2017*). We note that TfL have given further information on the following:

1.3.1. Our para 1.2.3. at deadline 3 about buses see 1.2 above

1.3.2. Our para 1.2.4. at deadline 3 where we suggested a number of junctions that should be modelled. We understand that some of these have now been modelled but are not yet convinced that the effects will not be significant

1.3.3. Our para 1.2.7 at deadline 3 where we questioned the margins of error in the modelling. We recognise that in some ways this has now been explained but are not convinced by TfL's argument that the range of effect if one takes maximum and minimum figures is not significant.

The questions we asked in the rest of section 1.2 of our document (170126 WSENV Silvertown submission to PINS ref id no 411 26 Jan 2017), do not appear to have been answered and therefore these concerns still stand.

2. Mitigation

- 2.1. We are pleased that TfL are prepared to talk to the Westcombe Society about mitigation. However we are still very concerned that mitigation is not to be considered in detail until the decision to build the Silvertown tunnel has been made.
- 2.2. We are concerned that most mitigation seems to be planned as reactive rather than proactive.
- 2.3. The thresholds for mitigation still seem very high. An increase of 120 vehicles per hour may be correct for some roads but for others a far smaller increase could be damaging. Surely setting thresholds as a percentage increase in traffic would be fairer.
- 2.4. We welcome additional traffic monitoring locations proposed but would like Vanbrugh Fields/Vanbrugh Hill and Westcombe Hill included.
- 2.5. As stated in 1.1.2. we feel that measures are already needed for the A2 southbound during the evening peak around the Sun in Sands

3. Pollution

We are still extremely 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 agree with others that it is not reasonable for air quality to worsen anywhere even if the increased level of pollution still remains within recommended levels. Therefore the points we made in section 4.1 of our Deadline 3 submission (170126 WSENV Silvertown submission to PINS ref id no 411 26 Jan 2017) still stand with the following additional comments:

- 3.1. We welcome the additional measuring locations proposed but feel that there need also to be additional measurements taken on Trafalgar Road, Woolwich Road, Tunnel Avenue and Blackheath Hill.
- 3.2. We would also like assurances that the Blackwall/Silvertown crossing and all feeder roads will be included in the Ultra Low Emission Zone when that is extended beyond Central London

4. Noise and additional HGVs

- 4.1. The effects of the expected increase in noise and vibration from additional HGVs has been modelled as minimal but this modelling does not take into account the possibility of over height vehicles travelling more than one at a time along the A102. HGVs travelling at speed are noisy and multiple HGVs travelling at speed will be extremely disruptive.
- 4.2. Noise monitoring is not currently scheduled to extend beyond 200m from the order limits. This is inadequate given the expected impacts are likely to extend along the A102 affecting our residents in Siebert Road and Westcombe Hill and others who live adjacent to the A102.
- 4.3. We welcome inclusion of the Siebert Road barriers in the S106 agreement with the Royal Borough of Greenwich but would still like to see the barriers extended so as to protect Invicta Primary School as well as the residential properties in Siebert Road and Westcombe Hill. We would also like to see a commitment to install the barriers before any work on the Silvertown tunnel starts.

5. User Charging

- 5.1. Our views on user charging have not changed and all the points raised in the document we submitted at deadline 3 still stand (*170126 WSENV Silvertown submission to PINS ref id no 411 26 Jan 2017*)
- 5.2. We note the proposed registration fee waiver for host boroughs but had not realised until reading the recently submitted documents that a registration fee will need to be paid every year and that the concession to waive it for host borough residents only applies for the first year. We had understood before that it was a one off registration fee that would be waived. Any concession is welcome of course but we feel this concession is of extremely limited benefit especially when the one off £10 we are being offered is set against the 90% discount enjoyed by residents of the Central London Congestion Zone!
- 5.3. Newham and Tower Hamlets are our neighbouring boroughs and, being realistic, most car owning host borough residents will need to cross the river at some point though many may not cross regularly. If the charges go ahead as planned those who are not eligible for discounts will in effect already be paying a higher per mile fee to cross the river than those who live further away and this will be compounded by an annual registration fee especially for occasional users. We feel this is very unfair especially as those who live further away have a more realistic choice of other routes. At worst this may encourage longer drives by local residents to avoid the charge. Do TfL really want to be seen as favouring longer distance traffic?
- 5.4. We would clearly still prefer a discount for host borough residents but as that is not currently on offer we want to state that we feel very strongly **that any registration fee should be waived permanently for host borough residents**. This would encourage continuing registration for all residents, would be seen as a real concession and would go a

small way towards reducing the per mile cost of crossing the river. If TFL say it is too expensive to waive the fee for host borough residents they should be raising the toll by a few pence instead to cover the cost so that it is spread out between those who actually use the tunnel rather than hitting local people who have no choice but to use the tunnel.

- 5.5.** We would also like to point out that the proposed difference in price for off peak travel as compared to the non-registered charge is very large compared to peak travel which discourages the occasional non-registered user from discriminating between peak and off peak travel. This large differential is also discriminatory to the 10% of the population who do not use the internet. Although many of those don't own cars a significant proportion probably do.

6. STIG:

In previous submissions we have been asking for residents' representation on STIG. If residents are not to be represented on STIG then we would like a formal process for residents' views to be fed into STIG. This is because we feel residents' are best placed to know when and where there are problems.

7. Landscaping:

We are still concerned about longer-term maintenance of landscaping as it still doesn't seem to be included in the DCO (see 170126 WSENV Silvertown submission to PINS ref id no 411 26 Jan 2017 7.) Littering in particular is a major problem and also deterioration of planting due to road spray.

8. Construction Liaison Group and Construction Traffic.

We would still like to request representation on the Construction Liaison Group. (*see 170126 WSENV Silvertown submission to PINS ref id no 411 26 Jan 2017 8.*) We would also like to strongly support Royal Borough of Greenwich in asking for safeguards in the Code of Construction Practice para 3.1.7 for the protection of north south routes which run parallel to the A102 from Maze Hill through to Charlton Lane.

9. Cost and Benefits.

We know that the Royal Borough of Greenwich is of the view that a package of river crossings is required to facilitate growth in the east and south east of London. We agree with this and are very concerned that this is not being considered. We feel that concentrating congestion and the associated impact on one corridor i.e. the A2/A102/Blackwall, is misguided.

The benefits of the proposed scheme still seem to apply mainly to those who happen to live and work on proposed bus routes and those who travel by car to/from further afield. In effect the tolls as proposed will disproportionately be of negative benefit to those who live/work closest to the tunnel and are therefore in most need of using it.

Westcombe Society Environment Committee

(Emily Norton – Convenor)