

**Request of the Department of Transport of 1 September 2017
for comments from the Applicant, the London Borough of
Southwark, Friends of the Earth and Interested Parties**

From Sally Hughes, [REDACTED]

Introduction

As a resident of Vanbrugh Hill, my interest centres on the additional pollution likely to occur as a result of expanding road capacity beyond the approaches to the Woolwich Peninsula. I live close to the intersection of Blackwall Lane, Woolwich Road and Vanbrugh Hill, and to the Angerstein Roundabout, which is the intersection of the A102 feeder road for both Blackwall, and prospectively, Silvertown tunnel mouths, and the A206 running between Greenwich and Woolwich town centres. Both junctions are already prone to virtually daily overwhelming and gridlock at busy times. Pollution recordings have been very high for some years Angerstein.

Angerstein permits traffic to travel to the Blackwall tunnel mouth from points closer than the Sun-in-the-Sands roundabout (the A102 and A2 junction), thus giving rise to route finding from Sun-in-the-Sands (and elsewhere) through local residential, shopping and school-going areas as drivers attempt to circumvent the heavily congested approach to the Tunnel via the northbound A102.

Overspill from Blackwall Lane approaches which are the last joining point for the Blackwall Southern Approach stretches back both to the Angerstein junction and to the Vanburgh Hill/Woolwich Road junction (A206), frequently gridlocking through traffic westwards to Greenwich town centre and eastwards to Woolwich (and, crucially, crossing points at Woolwich Ferry and Gallions Reach).

Plans to treble the resident population of the Peninsula, build a cruise liner terminal and redevelop North Greenwich Station and the business area at the northern point of the Peninsula have not been factored into the Silvertown plan.

My observations

1. The Applicant's response does not answer the question.

The response is predicated not only on the new Governmental air quality plans but also on the plans of Applicant's own political governing body (in the form of the London Mayoral draft transport and environmental strategies).

The UK Air Quality Plan has been widely criticised as weak, and inadequate to achieve its ostensible objectives. The Applicant's response has narrowed the issue of pollution reduction or mitigation to an exercise in risk management, ie *which projection least risks a failure to comply with antipollution standards?*

The further information request underlines that the proposed Silvertown Road is incapable of "improving" air quality. All the modelled concentrations at 22 scheme receptors (with the exception of one – ID 5683) opening in 2021, are **well in excess of the current annual mean limit value for NO₂ of 40ug/m³.**

Also absent from the Applicant's response are the assumptions underlying the Mayor's draft transport strategy.

These include the completion of viable and practicable crossings for pedestrians and cyclists, and increased public transport.

The Mayor's transport strategy relies heavily on changing the type of vehicles used, rather than reducing the number of vehicles. It rests on enhanced road pricing for non-compliant vehicles. This does not necessarily imply that actual numbers of vehicles will decline, or pollution decrease.

The Applicant has failed to show how long, daily instances of stalled traffic can be mitigated, managed or avoided, as an integral part of the Application.

The application of mitigation measures is bound up with quasi-private and 'legal' agreements with individual local authorities. The main application is therefore purposively set up to

avoid commitment to effective measures that would operate over all the approaches and the affected region. This is at odds with the Applicant's supposed role as strategic road authority for the London area.

My observation is that the Inspector and the Secretary of State must look behind these processes to ensure that local authorities are not forced to individually negotiate concessions, including expenditure to cope with overloaded junctions, tariffs and road charging to discourage excessive and polluting traffic, additional bus routes, and differential charging of their residents.

I refer, for instance, to the correspondence of 14 August 2017 from RB Greenwich to the Inquiry, in which Greenwich states the necessity of 'specifically including' Angerstein Roundabout in the scheme.

Greenwich states: *"When the original junction list was agreed Angerstein was excluded from the Applicant's DCO submissions as it was identified in both TfL's Dangerous Junction and Cycle Superhighway programmes. These programmes were intended to be developed and implemented prior to the Scheme's completion. Both of these schemes have subsequently been either significantly delayed or removed from TfL's Business Plan. Addressing the redesign of the Angerstein junction is an RBG priority."*

The Inspector and the Secretary of State must approach these issues holistically and in the public interest. They should place mitigation measures fully in the public domain so that they are open to scrutiny, pursue agreed policy objectives and achieve fairness.

2. I endorse the responses of Friends of the Earth and the London Borough of Southwark.

The analysis submitted by the Applicant does not improve on current knowledge, or the scenario already presented to the Inquiry.

The Applicant effectively has no plan to reduce pollution and self-evidently does not provide details of any 'further mitigation measures'.

A regional strategy must integrate pollution strategy and new road building and justify each project in the public interest.