

THE PROPOSED THAMES GATEWAY BRIDGE

RULE 6 STATEMENT

A conjoined Rule 6 Statement Submitted on Friday 25th March 2005 by: -

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INDECENT HASTE

There appeared to be an attitude of indecent haste on the part of Greenwich Council to ensure that the planning application was approved before the end of year 2004. There was a rumour doing the rounds that if they failed to pass it before the start of 2005 they would be unable to complete construction of the bridge for the London Olympics in 2012 if successful.

A point of order was made regarding the statement by Greenwich Council that we were now dealing with a totally new Planning Agenda and therefore there had been insufficient time to analyse, consider and discuss the new Agenda, the original Agenda having been discarded. They ran roughshod over the concerns of the objectors.

REPRESENTATION

We as residents have little or no funds to afford legal representation and in order to make a level playing field out of this public inquiry all parties should be unable to have legal representations themselves. Let them stand up on their own feet and speak for themselves unrepresented as we will have to.

DISCREPANCIES IN RECORDS & NOTIFICATION LETTERS

It has become apparent that there are discrepancies in the records kept for objectors' responses resulting in some groups being omitted from TfL's list of Objectors and Respondents (Statement of Case March 2005 point 9.28).

Also some Groups and individuals are not receiving letters from the Government Office in Newcastle and/or the Inquiry Manager's office in West Sussex who should be. This has resulted in groups/individuals being unaware of the pre-inquiry meeting, the date for the Public Inquiry and therefore having insufficient time in which to prepare their proof of evidence.

We have been unable to cross-check the lists of individuals ourselves as information has been denied under the Freedom of Information Act (Data protection) by both LB Greenwich and the Government Office of London (GOL). We have reapplied for lists of groups and organisations from LB Greenwich after lists were released by the GOL.

LACK OF FREEDOM OF INFORMATION

Information requested under the Freedom of Information Act is not always being made available to us even though we feel it should be in the public domain. Some requests are time consuming and on-going. In some cases our requests have been met by a request for unreasonably high charges. As we have been unable to afford these charges we have been unable to have copies of the requested documents. Therefore we feel this process has been undemocratic and has not allowed us to have detailed access to all information that we require to put our case forward at the public inquiry.

INADEQUATE CONSULTATION

We believe TfL did not consult residents adequately on the proposals for the Thames Gateway Bridge and that certain people were not included in the consultation process that we feel should have been.

We believe inaccurate information was given to residents by some TfL representatives at TfL exhibitions and road shows in Bexley Borough. We believe this breaks the good practice guidance which is 'to ensure Londoners are engaged and consulted effectively'.

Residents were not offered alternative schemes.

An Environmental Impact Assessment (EIA) was not available during the Consultation period and traffic figures also increased while the consultation was in progress.

FLAWED MARKET RESEARCH

We believe that TfL's Market Research is neither accurate nor balanced.

INSUFFICIENT INFORMATION

We believe that there has been a lack of accessible information available for residents to enable them to form a balanced opinion on the proposed Thames Gateway Bridge scheme.

TRAFFIC MODELLING

We believe that traffic modelling produced by TfL under-estimates the level of traffic that will be generated by this scheme with resultant adverse impacts on air quality, noise pollution, forecasts for road traffic accidents, damage to natural habitats and residents' quality of life.

We believe that TfL's Traffic & Transport Report (Table 4.11) does not show an accurate prediction of major traffic flow changes and therefore is redundant.

TfL's Traffic & Transport Report (Table 4.11) shows some roads in the LB Bexley as having a decrease in traffic flow as a direct result of the proposed Thames Gateway Bridge being built which we believe are evidently inaccurate and therefore need to be re-modelled before a Public Inquiry commences.

Other roads (such as Park View Rd, Welling) are shown as having decreases in traffic flow on Table 4.11 but will be used for suggested mitigation measures by TfL. Therefore these roads will actually receive an increase in traffic flow not a decrease.

It is also becoming apparent that there are other roads in the LB Bexley where there are concerns that 'rat running' may occur. We believe that traffic flows on these roads again have not been taken into account in TfL's traffic modelling.

Greenwich Council's consideration 'to make representations to the Mayor of London to secure the tolling of Blackwall Tunnel when the Thames Gateway Bridge opens' (Planning Agenda page 20, point 5.16 g.v.) has also not been taken into account in TfL's traffic modelling forecasts. This suggestion is also supported by the Thames Gateway London Partnership (TGLP).

There is also concern over the possible demise of the Woolwich Ferry which would transfer further traffic elsewhere. Again we believe that this has not been taken into account in TfL's traffic modelling.

TfL state that if traffic flows are under predicted by 25% there will be over capacity on the bridge and a loss of 'free flow conditions on the bridge'. In plain English this means congestion and an end to the travelling times predicted by TfL. These dubious time saving benefits for commuters form a major part of TfL's economic argument for having the bridge in the first place.

Independent transport consultant John Elliot states 'No previous big road has relieved congestion in London - they normally add to congestion over a wide area'.

This proposed bridge and resultant traffic will conflict with the Mayor's Transport Strategy which requires a reduction in traffic rather than generating and encouraging increased use of cars.

ROAD SAFETY

TfL have forecast an increase of 116 road traffic accidents per year that includes 6 serious accidents and one fatality as a direct result of the proposed Thames Gateway Bridge being built. If traffic forecasts are underestimated, these figures will increase further.

Some mitigation measures, we believe, can discourage cycling, especially at night as cyclists have to manoeuvre around built out kerbs and are forced into the path of following traffic.

AIR POLLUTION

European Union directives state that certain limits on air quality should be required by all member states by 2005. We believe that an increase in traffic and air pollution generated by the proposed Thames Gateway Bridge will breach EU limits of certain pollutants.

In Greenwich Borough's planning Agenda, the assessment concluded that 'in total there is a minor adverse change in exposure to air pollution as a result of the Thames Gateway Bridge'. The same agenda states (page 89, point 9.49) 'there is predicted to be more premises experiencing an increase in PM10 concentrations compared with a decrease'. In other words it is likely that **levels of PM10 will increase**. 'The evidence on health effects of PM10 suggests that there is **no threshold** for the onset of health effects'. From very low to high environmental concentrations of particles, increased exposure leads to an increased risk for those already susceptible to experience adverse health effects from air pollution' (Greenwich agenda, page 89). This will affect people who have existing heart and lung diseases including adults and children with asthma. If particles are small enough they may also carry surface-absorbed carcinogenic compounds to the lungs.

Bexley Council have documented that levels of Nitrogen Dioxide & PM10 in some areas of Bexley are expected to be close to the National Air Quality Objective levels in 2005. Many of these roads are residential and extra-generated traffic will detrimentally affect people's health.

LB Bexley has the worst rates of childhood asthma of any London Borough and increases in PM10 will pose further serious health affects to an area already recognised as having major health problems. This must surely conflict with national policies on health & air quality (Cleaning London's Air : Air Quality Strategy).

We have major concerns that LB Bexley already has an Air Quality Management Area (AQMA) in Manor Road, Erith. Many residents have serious concerns that the route along the A2016 and A206 will not be capable of coping with further predicted increases in traffic as a direct result of the proposed bridge being built. In particular it is believed that much of this traffic will be heavy freight & we believe it is totally unacceptable to knowingly add further pollution to an area where Bexley Council has a responsibility to adhere to the Mayor's Air Quality Strategy in actively improving air quality to protect the health of residents.

NOISE POLLUTION

Increased traffic will mean an increase in noise and for many people this will be constant noise day and night.

The London Mayor's 'Ambient Noise Strategy' describes noise as 'the forgotten pollutant'. In the GLA London Household Survey it states that 46% of Londoners polled considered noise a problem and 24% included noise as one of their top priorities for improving the quality of the environment in London. 13% then went on to say that traffic noise was a 'serious problem' for them.

Traffic generated by the proposed Thames Gateway Bridge **will** 'rat run' through our residential roads &

will cause disruptions to conversations & activities, increase stress & disturb concentration, rest & sleep to thousands of people. TfL state that 5000 people would suffer a 'moderate/substantial adverse effect' from extra noise but they would **eventually get used to it**.

People will **not get used to it** they will be **forced to put up with it** because they will have no choice. It will still affect their health & demean their quality of life.

BRIDGE DESIGN

Due to constraints on the bridge design we believe there may still be conflicts between the Port of London Authority (PLA), London City Airport (LCA) and the Environmental Agency (EA) that are still unresolved. We are concerned that compromises could be made to the detriment of the natural environment and people's enjoyment of the Thames Estuary.

ADVERSE EFFECTS ON NATURAL HABITATS

There is continued concern for Oxleas Woods. Although the Mayor Ken Livingstone, TfL and Greenwich Council have publicly pledged that the bridge and its associated roads will not affect Oxleas Woods will they be held responsible for future decisions that may be made by their successors?

We wrote to Ken Livingstone requesting that he publicly pledge that the bridge and its associated roads will not affect Lesnes Abbey Woods, Bostall Woods & Bostall Heath but have received no such pledge.

Lesnes Abbey Conservationists have objected to the proposed Thames Gateway Bridge on environmental grounds. There are many other open spaces & parks that will be detrimentally affected and threatened in Bexley & Greenwich by increased traffic and resultant noise or by the physical structure of the bridge.

It is obvious from recent planning permission that Bexley's Biodiversity plan is not worth the paper it is written on regarding safe-guarding rare and natural habitats.

There is concern that people's enjoyment, relaxation & access to places such as Danson Park will be spoilt as Danson Road will take the brunt of the traffic leaving the A2 to reach the bridge (and vice versa). Friends of Danson Park have also objected to the proposed scheme.

We are also very concerned that traffic volumes will necessitate the widening of Knee Hill in the future with the loss of ancient woodland. We have been informed that widening has been discussed (and the fact that it has been discussed worries us) and we have been given no reassurances that this will not happen **in the future** if the road is unable to cope. Knee Hill is already at capacity during peak times and close to capacity during inter-peak times and in our opinion it **will not** be able to cope with any further traffic.

The Environment Agency (EA) has also documented loss of and disturbance to, the environment although their remit is, we have been informed, focused on the Thames Estuary area.

TRAFFIC MANAGEMENT/MITIGATION

So far TfL's suggestions for traffic management are to 'encourage' traffic onto 'A' roads, which are near capacity already. Traffic 'given a choice' will use the quickest/easiest route, which will mean congestion and 'rat running'.

As far as we are aware no further traffic modelling has been carried out on Bexley's roads by TfL prior to the Public Inquiry even though both residents and Bexley Council strongly said this was crucial at Bexley's planning meeting in November 2004. Therefore residents and Bexley Council will still be none the wiser as to the true detrimental impact of generated traffic on Bexley's road network than we were in November 2004.

We also strongly believe that mitigation money is insufficient.

TOLLING REGIME

Flawed precedence.

We do not believe that tolls will discourage long-distance traffic and in particular heavy freight.

STRATEGIC BRIDGE NOT LOCAL BRIDGE

We do not believe this bridge is a local bridge for local people. We believe it is a STRATEGIC bridge for trans-national traffic.

Unlike the Dartford Bridge, the proposed Thames Gateway Bridge will be generating traffic into an already existing residential area with a lack of foresight about the real long-term problems this will cause.

REGENERATION/JOB CREATION/ECONOMIC BENEFITS

We do not believe that the proposed 6 lane road bridge is essential to job creation in the Thames Gateway area. There is no evidence to suggest what type of jobs would be created and no guarantee that they would benefit local people. It is more likely that people will travel from further afield therefore generating traffic and pollution.

Benefit Cost Ratio (BCR).
Professor Whitelegg report.

HEALTH

We have serious concerns regarding the apparent total lack of consultation between TfL and the LB Bexley's health officials regarding the health and well-being of Bexley residents.

POORLY THOUGHT OUT PUBLIC TRANSPORT

We have concerns over the possible demise of the Woolwich Ferry.

We believe there are also shortcomings in TfL's provision of adequate Public Transport.

UNSUSTAINABILITY OF THE THAMES GATEWAY

We are concerned that the whole Thames Gateway development is over-ambitious, not well thought out and unsustainable and that the proposed bridge should not be seen in isolation.

CONCLUSION

If this bridge is allowed to proceed it will be at the brutal disregard of the existing communities and the environment. The health implications would be disastrous with unforeseen consequences for future generations.

DO YOU WANT TO LEAVE THIS LEGACY TO FUTURE GENERATIONS?

WE RESERVE THE RIGHT TO EXPAND UPON THE ABOVE POINTS AND ADD FURTHER POINTS TO OUR PROOF OF EVIDENCE.