

Greenwich Action to Stop Pollution outline submission to the public enquiry into the proposed Thames Gateway Bridge

May 2005

Introduction

Greenwich Action to Stop Pollution (GASP) was formed in 1991 to protect the air quality within the borough of Greenwich. The organisation has recorded some notable successes:

- 1) prevention of the expansion of the Greenwich power station by London Underground
- 2) in alliance with others, successful opposition at the planning enquiry into the planning application for the Cory Incinerator station in Belvedere
- 3) putting Greenwich at the forefront of U.K. efforts to reverse the deterioration of our air quality through the high profile children's court case against Greenwich council to close Trafalgar Road when pollution levels exceeded World Health Organisation guidelines
- 4) successful resistance to a proposed Greenwich bypass
- 5) in alliance with others including Greenwich Council, successful adjudication at the enquiry into the proposed lorry ban in Greenwich town centre
- 6) in alliance with others, successful adjudication at the planning enquiry into the application by Greenwich and Bexley Healthcare Trust (supported by Greenwich Council) for a car park on Woolwich Common

Wherever possible we have worked with Greenwich Council e.g. in joint opposition to the proposed petrol station by Sainsbury, in the interests of safeguarding the air quality of the borough's residents. We have supported the efforts of the borough's air quality officer in each of the four stages that led eventually to the declaration of the whole borough as an Air Quality Action Zone and the development of the Air Quality Management Action Plan.

It is the organisation's view that all these considerable gains are in defence of our environment are now threatened by the proposed Thames Gateway Bridge (TGB). We intend to query the very notion that the proposal represents progress.

One only has to look at the economy of those areas of East London immediately adjacent to either the Blackwall or Rotherhithe river crossings to see that their residents are still relatively impoverished in comparison with the average levels of employment or earnings for London as a whole. We wish to examine this (in the light of the available evidence) to assess to what extent that their plight is the result of poor transport connections.

Aldous Huxley defined progress as a faster way of going backwards. This is certainly true of the effects of the proposed TGB development on human life. We intend to use the enquiry to examine the detail of this assertion by examining the figures in the Environment Statement for road safety casualties. We will further examine the impact of the proposal on air quality and the subsequent effect on mortality and the impact of respiratory and coronary illnesses on resident's ability to live economically activity lives.

Naturally GASP wishes to see progress but there are other directions that our society has the capacity to go in than the one being offered by the applicant. Such an alternative direction maybe is beyond the terms of the enquiry but rejection of the proposal would undoubtedly force Transport for London and the London Development Agency to develop more sustainable alternatives to what we believe to be an economic and not a transport problem. There are precedents for such a course of action. As long ago as 1999 a planning inspector turned down a development in Windlesham in Surrey on the grounds of the health impact of the generated traffic emissions.

Issues for which we wish to submit evidence

1) The role of the proposed Bridge in generating traffic on local roads

Paragraph 14.6.10 of the Environmental Statement refers to additional traffic on the A2 and the approach to the Blackwall tunnel. We wish to assess the impact of this on the A206.

Table 14.4 and Table 14.5 show that 89% of the traffic will be a mixture of the private car and commercial vehicles. Table 14.6 shows that 37% of all vehicles will both begin and end their journeys within the four boroughs. We wish to assess the notion that this proposal is able to differentiate between providing local access and long distance commuting.

- 2) The impact on road safety casualties
Both Transport for London and the London Borough of Greenwich have committed themselves to Government road safety targets. Table 14.9 shows that an additional 121 people will be killed and seriously injured as a result of the proposed TGB. We wish to assess the significance of this in the light of PSA agreements, commitments in both the TfL transport and road safety strategy, local authority LIPs and wider commitments on social inclusion, encouraging walking and cycling and health impact assessments.

- 2) Impact upon pedestrians
The Environment Statement lists numerous deterrents to the ability to access communities and facilities on the other side of the river without considering their net effect. These factors include the distance involved, wind factor, lack of seating, absence of bus stops and ambience. However no pedestrian flow modelling has been included. We wish to assess the true impact upon pedestrians in the light of research on the effect of these factors upon people's willingness to walk.

- 3) The likely results of an Health Impact Assessment
We wish to submit evidence of the health impact of the proposed TGB upon resident's health especially how the related illnesses affect education and training and the ability to lead economically active lives.

- 4) The impact upon air quality
We wish to examine the morality of accepting that some areas will suffer deterioration in air quality whilst others gain. This examination will take into account the EU directive and the 2003 regulations. Paragraph 15.6.34 omits Charlton ward. There is no assessment of the impact of a further deterioration upon an already poor environment. The pollutants chosen do not represent a comprehensive list of the most serious or harmful pollutants. Amongst the omissions are many of the most toxic heavy metals (other than Lead – see Reutter 1989), PAH and other organics and PM_{2.5} (especially pertinent given that a working group of the European Commission has urged adoption of a standard for this pollutant). We wish to submit evidence of the effects of other vehicular generated pollutants and to consider the synergetic impact of these.

Paragraph 15.7.4 concludes that more areas will be adversely affected than areas that gain. Table 16.4 shows that an additional 522 properties would be exposed to an increase in Nitrogen Dioxide and 130 to an increase in PM₁₀ but this is described as minor without any rationale offered for this assessment.

The lack of understanding of the significance of increases in air pollution occurs throughout the Environment Statement. One such example is table 16.5 where the net impact of the proposed TGB is a further 3.3 tonnes of PM₁₀, 56 tonnes of Nitrogen Dioxide and 54 tonnes of Carbon Dioxide but once again the use of percentages suggests only minimal impact. Table 16.7 compounds this sense of deception by using 0.003% for PM₁₀ rather than 3.3 tonnes of a pollutant for which many health experts believe that there may be no safe limit. The present poor quality of the local environment did not happen overnight but was the result of a continuous incremental rise in pollution. The Environment Statement accepts this process. We wish to examine this notion of that our environment will only be a little worse each year without any consideration of the compounded effect of this process.

At present the figures in the studies mask the reality that real people's lives are at risk of asthma attacks, long term illness and death. We wish to examine the scale of the so called "minor adverse" impact referred to in paragraph 16.9.6. In addition there is little evidence offered for the impact of pollution on particular demographic groups or individual lives and so we wish to call witnesses of all ages to provide testimony for this.

5) Impact upon noise levels

Paragraph 17.8.5 refers to an additional 4,569 properties affected by noise. The Environment Statement then goes on to propose that in effect people will simply get used to the noise. This is despite the principle of noise reduction being enshrined within the Mayor's ambient noise strategy and the UDP of both Greenwich and Newham local authorities. We wish to examine how the proposed TGB can be justified against these policies. We also wish to call witnesses to testify to the effect of noise on the enjoyment of their properties, sleep, levels of stress and general health.

6) Impact upon climate change

We would like to place the debate on pollution within the wider one of climate change. We wish to assess the impact of increases in Carbon Dioxide and other vehicle generated greenhouse gases (especially methane) from the proposed TGB. We wish to refer to U.K. and E.U. commitments on climate change and examine how traffic growth impacts upon these commitments and how the proposed TGB would contribute to that traffic growth.

7) The recent history of local resident's experiences of air quality

The interpretation of air quality regulation places a stress upon the context of the proposed development, we therefore wish to provide evidence of the poor state of the environment over a long period of time. We wish to examine the link between a poor environment and the economic under performance of the borough.

In my role as Secretary I shall coordinate the submission of papers on these issues on behalf of GASP. If in the meantime you wish to contact me please do so:

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I look forward to corresponding with you and meeting you at the enquiry.

Yours sincerely

Philip J Connolly
Secretary
Greenwich Action to Stop Pollution

