

Ms Pippa Hack
Director (Regeneration, Enterprise & Skills)
Royal Borough of Greenwich

19 July 2018

Dear Pippa

Your ref: 18/2354/EIA

Scoping Opinion under Regulation 15 of the Town and Country Planning (EIA) Regulations 2017 for a mixed-use development to provide circa 650 homes, 1,215sqm of A1-A3 use, 360sqm of B1 use, new public realm, transport interchange and associated parking and servicing arrangements

I am writing to outline my concerns over the proposal to develop Henley Cross, Kidbrooke Station Square - TfL's 1.62 hectare site to the north of Kidbrooke Station. The developers Notting Hill Genesis propose building 650 homes on the site.

These numbers are on top of the 4,800 new homes being built as part of the Kidbrooke Village regeneration project.

Whilst I welcome the development of homes that will meet the acute needs that exist in my constituency, it would be irresponsible to encourage further development in this area without insisting on improvements to the local infrastructure, especially public transport.

The need for improvement to local public transport

I have made several submissions to various TfL transport consultations over the years expressing my concern that southeast London has suffered from lack of investment in new infrastructure, particularly in Greenwich.

In the past three decades I have been involved in several campaigns that have demanded that stations in Greenwich Borough were added to major infrastructure schemes. These include the DLR station at Cutty Sark Gardens, the Jubilee station at North Greenwich and the Crossrail station in Woolwich. It now seems unthinkable that these schemes did not include these stations in their original plans. Kidbrooke is another example of a local community and its needs being disregarded by transport planners.

Trains on the Bexleyheath line which serves Kidbrooke are routinely overcrowded, delayed or cancelled. There has been no significant increase in frequency or capacity of train services since the Kidbrooke regeneration project began. Southeastern recently acquired extra carriages to provide more capacity by providing longer trains, but these are few and far between on the Bexleyheath line and we continue to have virtually no 12 car trains and too few made up of ten cars.

I fear that the desperate need for a proper transport plan for Kidbrooke will continue to be ignored. This is borne out by the response from TfL over alterations to the 178 and B16 bus services in Kidbrooke. Whilst I appreciate TfL's participation in the public meetings I set up with the local London Assembly Member Len Duvall on behalf of residents, I am disappointed that they have taken

so long to respond to my constituents' complaints. There was no consultation over their removal of these services at the beginning of the Kidbrooke regeneration project, or what should replace in the future. But when residents demanded they be reintroduced, TfL insisted on a long and extensive consultation. This episode illustrates the complete lack of a comprehensive forward-looking transport plan for the Kidbrooke development.

The development of Station Square should not be allowed until there is a robust and practical transport plan for the area. It is over twenty years since the Kidbrooke regeneration programme was first conceived and it is one of the biggest developments of its kind in London; which makes it all the more surprising that no extensive plan for transport infrastructure exists.

Such a plan must include rail and road transport improvements aimed at minimising dependency on cars to get around the area and to commute to London. A bus route from Kidbrooke to North Greenwich has been mentioned, but I have had no confirmation that there is funding for this or a planned start date. But, given the scale of the overcrowding which also exists on the existing transport network, just adding a bus route will not be sufficient.

We must plan ahead to address the increasing demand for large numbers of people to get to and from North Greenwich by public transport. This is not just a problem during peak hours, but throughout the day and exacerbated when the O2 arena is in use.

Twenty years ago, London Buses told me there was no demand for a direct bus service between Eltham and North Greenwich Station. I finally won my argument and the 132 bus was extended to North Greenwich from Eltham. Very soon after its introduction it had to be increased from a single deck bus to a double deck bus due to the level of demand. Very soon after this the frequency of buses had to be increased. Demand for people to get to the O2 and to commute from North Greenwich is growing rapidly.

A DLR station at Kidbrooke

If we are to plan ahead and reduce the demand for road space on the already heavily congested roads around the approaches to the Blackwall Tunnel then we need to significantly increase public transport capacity. This cannot be achieved by running a bus route. There is sufficient land in the ownership of TfL adjacent to the A102, A2 and the railway between North Greenwich and Eltham to run a DLR service connecting with Silvertown. The minimal land acquisition needed by TfL for such a scheme would substantially reduce the cost. I therefore strongly recommend that it be given consideration as part of the Silvertown scheme even at this late stage.

I would build the DLR extension without Silvertown, but I would not build Silvertown without the DLR extension to Eltham.

In addition to the above it is essential if this development is to go ahead that extra rolling stock is provided to allow the running of longer trains and increase the capacity of local rail services. I look forward to discussing these issues with TfL but until these issues are properly considered I cannot give my support to this development.

Air Pollution

Whilst I support the Mayor's policy to secure 50% affordable housing from the development of TfL land, I have serious reservations about the suitability of this site for housing. It is located between the A102 and the railway, meaning that it will suffer from a great deal of noise and air pollution. It is a classic example of cramming in social housing on substandard land. The site is next to the busy Kidbrooke road junction which will add to these problems, particularly if the Silvertown scheme goes

ahead with traffic management measures to prevent an increase of vehicles from outside of communities in Greenwich.

Air quality in Greenwich is causing increasing concern among local residents and this can only get worse along the approaches to the Blackwall Tunnel as a consequence of the addition of the Silvertown crossing. Work on the new tunnel could begin early next year and is expected to open from 2024.

According to Londondair - the website of the London Air Quality Network - the roundabout at the junction of the A2 and the A2213 already has severely elevated levels of both particulates and NO2 pollution. They measured annual mean NO2 air pollution at the roundabout at over 90 microgrammes per metre cubed (ug/m3)¹, which is well above the EU recommended level of 40 ug/m3²

The A2 is only two lanes in each direction from the Greenwich and Bexley border to the Sun in the Sands junction with the A207, causing this section of the approach to and from the Blackwall Tunnel to become heavily congested during peak hours. The *Kidbrooke Station Square Environmental Impact Assessment Scoping Report* submitted on behalf of the developers dismisses any significant impact that the new Silvertown crossing may have, saying *"In the near future, the Silvertown Tunnel will also provide relief to congestion on the A2 in the vicinity of the Blackwall Tunnel. It is understood that the modelling work for the Silvertown tunnel predicts that the proposed tunnel would have a minimal impact in the vicinity of the proposed development."* We have all seen these sorts of predictions about major road projects before and in nearly every instant the modelling is shown to have been defective. Road projects like this inevitably generate more traffic, not less. Unless there is a significant traffic-management scheme and substantial improvement in local public transport in place before the road project is completed, more and more drivers will seek to use the new tunnel and congestion will continue to deteriorate.

More traffic not less will be attracted along this route because of the Silvertown crossing. The congestion on the existing motorway is going to lead to more vehicles using the surrounding roads - further adding to the air pollution problem which is already above acceptable levels.

Parking

Residents of Kidbrooke Village and the surrounding area are already experiencing considerable problems caused by the increased demand for parking places. Little forethought was given to the problem of residents' parking by the developers who adopted a policy that assumed people would prefer to use overcrowded trains and the two bus routes that serve the area rather than their cars. This policy has caused huge problems which the council has had to resolve by blanketing the area around the Kidbrooke development with a Controlled Parking Zone. This has created a great deal of resentment between the long-standing communities and the new residents of the Kidbrooke Village. The Kidbrooke Village development allocated roughly one parking space for every residential unit which has been proved inadequate. The proposals for the Kidbrooke Station Square proposes only 0.22 parking spaces per unit – less than a quarter of what was provided in the Kidbrooke Village regeneration.

Developers cannot be allowed to keep failing to learn from mistakes like this. The displaced parking from the Square will cause mayhem in the surrounding streets and once again the local community and the local authority will have to pick up the pieces by being forced to implement costly CPZs and other measures.

¹ <http://www.londonair.org.uk/london/asp/annualmaps.asp>

² <http://ec.europa.eu/environment/air/quality/standards.htm>

The ratio of parking spaces to homes falls well short of targets set by London's planners. The Royal Borough of Greenwich's residential parking standards sets out a ratio of one space per unit³ and the Mayor for London sets out a target of 1.5 spaces per unit for residential developments in areas like this with a PTAL between 2 and 4.⁴

Overdevelopment and height

The development comprises 650 homes and three blocks of 8 storey, three of 14 storeys and two of 24 storeys overshadowing even the controversial 21-storey block proposed for Kidbrooke Village. When TfL first proposed this development, they announced it would provide 400 properties.⁵ Now they are looking to cram another 250 people into higher and higher tower blocks. This will present a vista of an unattractive wall of tall tower blocks visible from far away. The view from Blackheath in particular will be intruded on by these blocks.

Lack of community planning

The lack of foresight of developers in Kidbrooke can be exemplified by the way that the community facility OneSpace has been treated since the Kidbrooke development began. OneSpace offers high quality community based project work which acts as a vehicle for social cohesion and integration by working with residents and especially local school children and is in use seven days a week.

However, OneSpace continue to be housed in a temporary location in Kidbrooke Park Road. I have had several meetings with senior directors of Berkeley Homes and promises have been made about providing this vital local centre with a purpose-designed centre with both indoor and outdoor facilities allowing them to provide a combination of recreational and educational opportunities. So far none of this has materialised.

This lack of vision for providing the social infrastructure that every community depends on is typical and I am concerned that similar mistakes are being made in the Station Square development.

Conclusion

This is clearly a case of over-development with TfL looking to maximise their financial returns by cramming too many people onto a site that is intrinsically unsuitable for housing on this scale. I hope that the planning authority looks closely at this issue and rejects the environmental impact assessment that the developers have provided on the grounds I have set out above.

Yours sincerely



Clive Efford MP

³ <http://content.tfl.gov.uk/residential-parking-provision-new-development.pdf#page=68>

⁴ <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-six-londons-transport-0>

⁵ <https://tfl.gov.uk/info-for/media/press-releases/2017/march/tfl-partnership-to-deliver-400-new-homes-in-kidbrooke>