



River Crossings Consultation – Joint Response

To the Mayor and Transport for London

1. This is a joint response to the consultation on proposals for new river crossings from Campaign for Better Transport, Living Streets, London Cycling Campaign, London Sustrans and CTC London. These organisations are also likely to submit their own consultation responses.
2. Our organisations object to the proposed crossings of the river for motor vehicles: the Silvertown Tunnel, a ferry at Gallions Reach Ferry and a bridge or tunnel at Gallions Reach, which could replace a ferry. The new crossings are intended to relieve congestion, particularly at the existing Blackwall Tunnel, and to assist economic growth in East London. In our view, they would do neither.
3. The proposed Silvertown Tunnel would double from four to eight the number of traffic lanes across the Thames from the north Greenwich peninsula. When the Blackwall Tunnel was doubled in capacity in 1966, from two to four lanes, traffic using the tunnel more than doubled and did not fall significantly or also increased on other river crossings. That motor traffic grows because of increases in road capacity has been recognised since at least the SACTRA report on Trunk Roads and the Generation of Traffic in 1994. Induced traffic is particularly likely to occur in urban areas where demand has been suppressed by congestion.
4. We note that the Silvertown Tunnel is to be designed exclusively for motor vehicles and will not accommodate pedestrians or cyclists. TfL provides no evidence or information to back up its claim that the new infrastructure would give it the opportunity to 'enhance the local environment and consider ways to improve local access for pedestrians and cyclists'. The higher motor traffic volumes created by new river crossings are unlikely to result in environmental enhancement or improvements in pedestrian and cyclist access indeed the opposite will be the case: the new roads and motor traffic will increase traffic domination. Conditions for walking and cycling will suffer. Environmental conditions will also deteriorate and increases in noise and air pollution will be a particular concern for local communities where air quality is already low and often in breach of European standards.
5. TfL claims that providing for additional access by motor vehicle will support growth in jobs and population by reducing delays and making journey times more reliable. In our view additional traffic is likely to exacerbate not relieve congestion and will add to delays. The last 20 years have shown how a programme of traffic reduction, public transport and cycling and walking improvements can support population and job growth. Economic activity and investment in London require high environmental standards and will be deterred by the opposite. New roads, as another SACTRA

report concluded, may also allow economic activity and investment to leave rather than to come to an area.

6. All these concerns echo the Inspector's report, published in 2007 following the Public Inquiry into the Thames Gateway Bridge (TGB), a similar proposal for a road crossing for motor vehicles in East London. This concluded that the bridge: 'would ...not improve safety for all road users' (paragraph 9.85); 'would reduce travel by cycling and walking' (9.93); 'that public transport ...would be less well used (with the scheme) than.. without' (9.155); and that 'on balance the scheme would be likely to cause increased congestion' (9.187). As a result 'air quality would be worse in 2016 with the bridge than without the bridge' (9.416). The Inspector looked at the economic regeneration benefits claimed for the bridge by TfL and found that: 'the potential of the scheme for giving rise to negative economic effects has not been assessed by the promoter. The evidence is that it would be likely to be associated with an increase in deprivation.' (9.302) and that '...the key to this is the economic regeneration benefits claimed for the scheme. (Here the Inspector) did not consider the evidence to be strong enough or reliable enough to outweigh substantially the dis-benefits of the scheme'.
7. Our organisations are concerned at the failure, in TfL's Assessment of Options, to consider a package of measures, implemented together, that might include for instance: road user charging based on the M25 or some other boundary; reducing car parking space and increasing its price; a smart travel programme; public transport improvements; a major programme to improve walking and cycling conditions on the road network; complementary land use planning measures and new river crossings for public transport, pedestrians and cyclists but not for general motor traffic. Such a package, whose costs would be covered or substantially off-set by road user charging, would allow more efficient use of the road network, eliminate traffic congestion and delay, ensure that essential road journeys could be made more reliably and create the quality of environmental and transport conditions that modern cities and urban economies increasingly demand.
8. Finally, we are also concerned about the poor quality of the consultation exercise now being conducted by Transport for London. Much of it is very misleading. For example, it is based on the proposition, which has been proven to be false, that creating additional road space for motor vehicles necessarily relieves congestion. The slide comparing increases since 1990 in public transport crossings of the river with highway capacity is also misleading: in the period to which it relates the capacity of some roads in east London, for instance the A13 and A12, was also substantially increased. The consultation asserts the benefits but does not acknowledge any defects in the proposed river crossings. It fails to explain the many likely damaging impacts or to consider the real alternatives to road crossings for motor vehicles which local communities might find more attractive.

January 2013

Contact: Richard Bourn
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

16 Waterside, 44-48 Wharf Road, London N1 7UX
Registered Charity 1101929. Company limited by guarantee, registered in England and Wales: 4943428