

## Lower Thames Crossing – consultation response

### Context:

This is the response from Campaign for Better Transport to the Department for Transport's consultation "Options for a new Lower Thames Crossing".

Consultation website and documents: <https://www.gov.uk/government/consultations/options-for-a-new-lower-thames-crossing>

### Q1: Do you agree that there is a strong case to increase road-based river crossing capacity in the Lower Thames Area?

We disagree, and we are concerned that the review published by the Department for Transport in May 2013 did not consider this question, with its scope covering only the different options for new road capacity put forward by the last review in 2009.

Our case against these crossings is set out in brief below.

#### 1a. New or widened road links are the wrong solution to congestion

Campaign for Better Transport has opposed policies of 'predict and provide' for many years, and there is a substantial and well-established evidence base that new capacity has a very limited and short-term effect on congestion - filling up again rapidly while locking in unsustainable travel patterns.

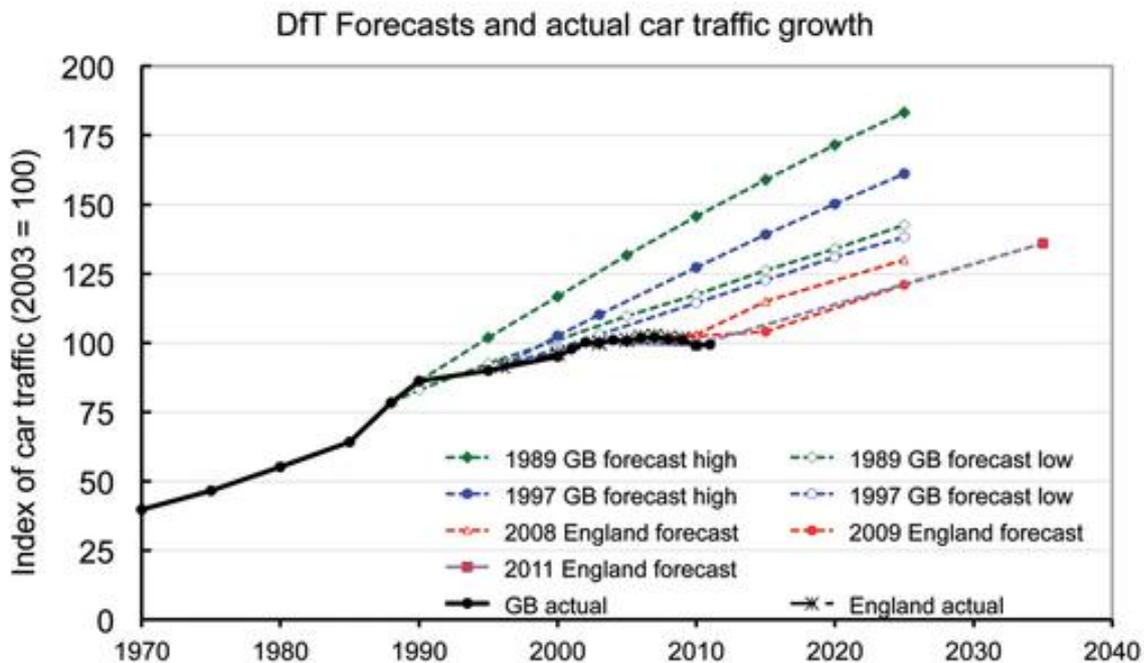
The consultation documents show that all the proposed routes would cause widespread environmental problems, including massive ecological damage and worsening air pollution. These factors are not fully taken into account in the standard methods of assessment (which over-emphasise time savings for vehicles on the roads) yet, even with these omissions, the modest benefit-cost ratios given show that the case for new road-building in this area is weak and that other options with higher value for money should be sought.

In addition, the projected economic benefits are based on a comparison with traffic forecasts that are in clear need of revision, and are likely to produce very exaggerated levels of benefits from travel time savings when used for long-term calculations. This is notwithstanding the opportunity to reduce the impact on traffic of proposed new developments in the area (see section 1c below).

The chart in Figure 1 is a comparison, produced by Prof Phil Goodwin for Local Transport Today (<http://www.bettertransport.org.uk/campaigns/roads-to-nowhere/lrt-130412>) of Department for Transport

forecasts vs actual traffic levels for the UK in recent years and it is clear that the methods used for these forecasts need to be reviewed. Each successive forecast has consistently overestimated traffic growth.

**Figure 1: DfT forecasts vs actual traffic 1989-2011**



We therefore strongly urge the Government and Highways Agency to look again at other options for improving transport in the Lower Thames area and oppose all of the road-building options put forward in the consultation.

### **1b. Car dependency in the surrounding area should be tackled**

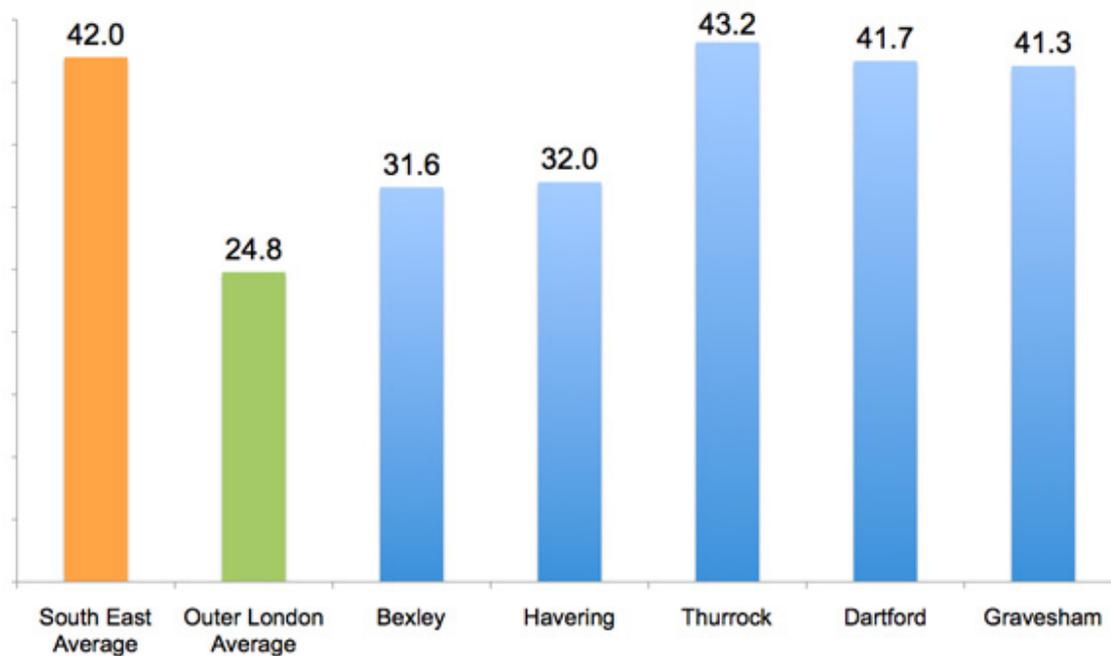
Many measures that could be used reduce traffic over the Dartford-Thurrock river crossing are currently neglected and under-utilised, and this is shown by the high levels of car dependency in the area.

The extract of data from the 2011 Census shown in Figure 2 helps to illustrate this problem. Travel to work by car is much higher in Havering and Bexley than in outer London as a whole, and even higher levels of reliance on the car are seen in Thurrock, Dartford and Gravesham.

The goal of reducing congestion on the current river crossing would be much better achieved with measures to reduce car dependency in the surrounding areas than by new road-building, cutting down on the many local and short journeys that currently contribute to high traffic levels at the crossing and giving people the better transport options they currently lack.

**Figure 2: Travel to work mode (per person, %) from the 2011 Census**

(<http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-295663>)



### **1c. New developments in the area should have a low impact on traffic**

Given proposals to develop the Thames Gateway area, the aim should be that new areas of housing and industry should generate as little traffic as possible and prompt the introduction of new public transport services that also benefit other areas nearby.

Within the new developments, the need to travel should be reduced as far as possible by making sure shops and services are within reach by walking and cycling, and the new developments and workplaces should be at least as well served by public transport as a typical outer London borough.

In 2008, Campaign for Better Transport commissioned Transport for Quality of Life to look at planning for new developments and this work produced a number of recommendations for the Thames Gateway. These are reproduced below and the full 'Masterplanning Checklist' document can be read online here:

[http://www.bettertransport.org.uk/system/files/Masterplanning\\_Checklist\\_2008.pdf](http://www.bettertransport.org.uk/system/files/Masterplanning_Checklist_2008.pdf)

If implemented and combined with public transport, Smarter Choices and other initiatives, these proposals would not only reduce the impact of Thames Gateway developments on the Dartford-Thurrock river crossing in the future but could also, by providing new services help to cut the levels of congestion currently experienced in the surrounding area.

## **Recommendations for Thames Gateway policy**

### **Prioritise the most sustainable locations for development**

Housing development in London should be prioritised over development in Kent and Essex, since there is greater potential to link into a high quality public transport network. The London Housing Capacity Study identified capacity for 146,000 homes within East London, which is more than 90% of the target for housing development in the whole of the Thames Gateway.

Within London, housing development should be focussed initially in those areas with the best public transport and then in areas where substantial improvements to public transport are planned or possible. Sites which currently have poor public transport should not be developed until public transport has been improved.

### **Focus development where high densities are appropriate**

Areas with poor public transport which are considered unsuitable for development at densities below 100 dwellings per hectare should remain undeveloped unless and until public transport can be improved. No significant sites should be developed at net densities of less than 100dph.

In areas with excellent public transport links, net densities of new housing developments should be at least 200dph in order to maximise the number of households able to enjoy excellent public transport connections. This figure is in line with densities recommended in the London Plan for central and urban locations with very strong public transport access.

### **Tighten parking provision in new developments**

Even the strictest parking standards for residential developments in The London Plan are notably high and liable to lead to high levels of car use, despite the ambitions for sustainable transport expressed elsewhere in the plan. The evidence presented in this report shows that new developments in continental Europe observe much lower standards, and, moreover, that the level of parking expressed in the London Plan would represent a significant deterioration even from the existing car ownership levels in wards of London boroughs well served by public transport – exactly the sorts of wards which new development should be concentrated in. Parking provision has a fundamental influence on travel habits and standards should be set at 0.5 parking spaces per household or less, with substantial proportions of new developments designed as car-free.

### **Re-balance funding between public transport and road schemes**

There should be a review of public transport and road schemes in the Kent and Essex parts of the Thames Gateway to identify a series of ambitious new public transport schemes which would unlock the potential for sites to be developed to high densities. The overall aim should be a re-balancing of transport expenditure so that at least 50% (and in the short term, 75%) is for public transport, walking and cycling.

Where new public transport is planned to serve housing developments, it should have sufficient capacity to meet the desired public transport modal split.

In planning for new development in the Thames Gateway, a high priority and a high proportion of overall public transport funding should be given to the local transport links – cycle paths, walking links, bus rapid transit, conventional bus, DLR and other light rail.

Current plans for the Thames Gateway involve a number of proposals for major road schemes, at various stages of development, that are liable to increase overall road capacity and create the conditions for development of car-dependent sites. These include the Thames Gateway Bridge, the Silvertown link, plans for a Lower Thames Crossing, and possible plans for Junction 30 of the M25. These and other road schemes should be cancelled or reconsidered.

*Masterplanning Checklist, Transport for Quality of Life, 2008*

### **1d. Long distance freight traffic should be moved to rail**

There is huge potential to move freight currently carried by HGV through the Dartford-Thurrock river crossing onto rail.

If achieved, this would diminish the case not only for new capacity at Dartford but also for road-building elsewhere. The A14 is another congested route suffering from high levels of HGV traffic and, with the M2/A2 and M11, forms a heavily used route to the north of England from the Channel ports. Reducing the amount of freight carried by road from these ports would also reduce the justification for the planned £1.5 billion bypass of Huntingdon on the A14 and help reduce problems at all points on this route north.

In our response to the A14 Challenge in January 2012

([http://www.bettertransport.org.uk/files/A14\\_response\\_CBT\\_final.pdf](http://www.bettertransport.org.uk/files/A14_response_CBT_final.pdf)), Campaign for Better Transport argued that there was no reason that rail mode share for freight at Felixstowe could not be brought up to the same level achieved already by Southampton thanks to improved rail links (39%) and this is also the case for the ports in Kent.

We will not discuss other freight options in detail, but HGV traffic on this section of the M25 and the Dartford crossing could be further reduced by using more appropriate ports for destinations north of the Thames, by increased utilisation of the Channel Tunnel for freight (and improving rail lines beyond Barking so European freight wagons can continue north from High Speed 1), and by major new projects, such as new lower Thames rail links.

### **Q2: Which of the following location options for a new crossing do you prefer**

None – The options given are all for new road capacity at a cost of £1.2 billion to £5 billion and we are opposed to all such proposals. Better value non-road investments and a wide range of other measures should be considered instead (see answer to Q5).

**Q3: Please indicate how important the following factors were in influencing your preference for the location of a new crossing, in answer to Q2. Please mark whether they were very important, important or not important.**

N/A

**Q4a. Is your preference for the location of a new crossing, in answer to Q2, conditional on whether a bridge, bored tunnel or immersed tunnel is provided?**

N/A

**Q4b. If yes, please indicate which type of crossing you would prefer:**

N/A

**Q5. Do you wish to add any further comments?**

### **5a. New multi-modal studies should be commissioned**

It is important to remember that congestion is not the only problem caused by high traffic levels so we ask the Government to look again at ways to reduce traffic, not merely to accommodate or encourage traffic growth.

Reducing traffic levels would help reduce congestion more permanently and sustainably, and would also bring additional benefits for air pollution and noise, as well as cutting carbon emissions and reducing reliance on fossil fuels. Adding new road capacity would exacerbate all of these problems while providing only a temporary improvement in congestion and encourage more traffic in the short and long term. The increased capacity would also lead to 'knock-on' traffic on surrounding roads and would therefore increase traffic-related problems on both sides of the river.

We therefore strongly urge the Government to commission a more wide-ranging review of the transport problems in the Lower Thames area, focused on ways of reducing congestion that exclude road-building. These should then be consulted upon to produce an integrated package of measures that are implemented by the Government, Highways Agency, Transport for London, Local Authorities and developers.

In the next section, we briefly suggest some alternative proposals that could be considered by such a review.

### **5b. Measures to support other modes of travel and reduce traffic**

Instead of being used for new road links, any funds available should be dedicated to reducing traffic and providing alternatives to passenger and freight transport on the roads.

Measures that could contribute to a better transport system at a lower cost than the proposed new road crossings include:

- Comprehensive programmes of Smarter Choices covering all the surrounding London boroughs and local authorities.
- Extensive travel planning and improved public transport for traffic-generating hubs in the area, such as the Bluewater and Lakeside shopping centres

- Extension of the Oyster smart ticket system to cover the whole of the Thames Gateway, along with simple and affordable zonal fares
- More frequent and more integrated bus services between local centres
- More opportunities to cross the lower Thames as a pedestrian or by bicycle
- Better ferry services between Gravesend and Tilbury and consideration of additional ferry and waterbus routes
- Rail service improvements, including a possible new station where HS1 meets the Essex Thameside railway
- Express coach and bus services targeted at commuter corridors
- Recognising that the Thames poses a challenge to providing direct, single-stage public transport trips, resources should be committed to improving integration between existing and new bus, ferry coach, and rail services. Development of these services should go hand in hand with the development of clear network maps, integrated timetables and real-time information to make these journeys a simple and attractive alternative to the car

If more substantial levels of funding are available, larger schemes to improve travel by other modes should be considered in preference to new road crossings. Proposals for further study could include:

- Rail line reopenings and extensions of tube, overground or Crossrail services into the area.
- New rail crossings of the Thames, providing local/regional rail capacity not just long-distance services.

**July 2013**

**Sian Berry, Roads and Sustainable Transport Campaigner  
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.

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