

TfL consultation on proposed Gallions Reach and Belvedere river crossings ~ Response from Campaign for Better Transport

February 2016

Objection to proposed new road crossings at Gallions Reach and Belvedere

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment.

We would like to formally object to the proposed new road crossings at Gallions Reach and Belvedere on the grounds that they will not deliver the promised benefits and will in fact undermine key policy goals on regeneration, modal shift, carbon reduction, air pollution and public health.

Road-based crossings represent a wasted opportunity to promote sustainable transport as part of a wider sustainable development approach and are therefore a waste of public money.

In addition, other more sustainable and less damaging alternatives to a new road have not been properly considered, in particular a series of measures to improve the local infrastructure for pedestrians, cyclists and public transport.

A sustainable transport approach would be more likely to provide usable connectivity while making the growing residential centres on either side of the river more attractive places, strengthening the local economy.

An approach based on sustainable modes would sit far more comfortably with the NPPF which advocates that “*economic, social and environmental gains should be sought jointly and simultaneously through the planning system*”¹ as well as the Mayor of London’s transport strategy which aims to “*reduce the need to travel, encourage the use of more sustainable, less congesting modes of transport (public transport, cycling, walking and the Blue Ribbon Network), set appropriate parking standards, and through investment in infrastructure, service improvements, promotion of smarter travel initiatives and further demand management measures as appropriate, aim to increase public transport, walking and cycling mode share*”.² It is difficult to see how the current proposals would meet these requirements.

Developing road crossings primarily for private motor vehicles is not the kind of connectivity that is most needed. TfL’s latest annual figures show strong upwards growth in rail and bus use, while car use is falling: “*vehicle kilometres in London in 2014 were 9.5 per cent lower than in 2000 and this fall in road demand has been a consistent feature of the last decade. Between 1994 and 2014 there has been a net shift in mode share, at the trip level, of 13 percentage points away from the private car towards public transport, walking and cycling. This shift relates to all travel in London, whether by residents or non-residents.*”³

Road-based connections will not provide the kind of regeneration most needed by the communities on either side of the river. As the mapping produced in the consultation shows, new road crossings will bring a

¹ National Planning Policy Framework

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

² Mayor’s Transport Strategy – Part two Challenges, policies and proposals

https://www.london.gov.uk/sites/default/files/mts_chapter_4_0.pdf

³ Travel in London: report 8 <http://content.tfl.gov.uk/travel-in-london-report-8.pdf>

massive increase in traffic volumes through these neighbourhoods, adding to noise pollution, air pollution and community severance.

The phenomenon of induced traffic is well-established. Indeed, Highways England's latest reports on the Dartford Crossing demonstrate that new road capacity cannot provide a sustainable long-term solution: *"Analysis of traffic data shows that traffic demand at Dartford has responded in step with capacity; such that whenever new capacity has been provided, it has filled up and created the need for more capacity. This has been a recurring pattern since the second tunnel was opened at Dartford in 1980 and then the QEII Bridge in 1991. Today there is insufficient capacity to cater for current and future traffic demand."*⁴

There is also a risk of displaced traffic on to local roads with adverse impacts on congestion, safety and environmental quality, particularly in the event of tailbacks or bridge/tunnel closures.

The higher traffic volumes and encouragement of car use arising from new road capacity would be at odds with other key public policy priorities.

- Carbon reduction. The UK has a binding target of an 80% CO₂ emissions reduction by 2050 and reducing transport emissions is key to achieving this.
- Air pollution. The UK Government has been found to be in unlawful breach of air quality standards, with London's air the dirtiest in Europe. The major source of NO_x and particulates is emissions from diesel engines. London's target for achieving acceptable air quality is 2025: that is the same date the proposed road crossings would open, immediately putting any achievements in air quality at risk.
- Obesity and health inequality. The Health Secretary recently called the rise in obesity, particularly child obesity, "a national emergency"⁵. Londoners living in Richmond upon Thames are 1.5 times more likely to be physically active than those living in Barking and Dagenham.⁶ Safer and more attractive provision for active travel, walking and cycling should be prioritised ahead of promoting a new generation of car-dependency.
- Sustainable housing development. The Government is reviewing the National Planning Policy Framework to focus higher density development around commuter hubs, rather than on new road links.

One aim of the proposed Gallions and Belvedere crossings is to assist access to employment. Road-based crossings will reinforce patterns of exclusion from work for those who do not have cars or do not drive, particularly young people and the long-term unemployed. Research we conducted with the DfT found that encouraging sustainable travel helps increase the pool of labour for companies by increasing employers' access to non-car users in the workforce, leading to real benefits for employers, employees and the wider economy.⁷

The proposal to have tolls on the crossings – which we agree would be essential for demand management as well as funding – would increase the tendency for these to be primarily through routes for commercial traffic, with little or no local benefit.

This risks undermining the programmes of investment in regenerating neighbourhoods in north Greenwich, Thamesmead, the Royal Docks and Barking to provide sustainable new housing schemes and does nothing to address the very poor public transport connections in Thamesmead and Barking Riverside. In contrast, rail and light-rail-led regeneration is one of London's great success stories, as evidenced by the DLR (most recently the cross-river connection to Woolwich), the Jubilee Line extension through Bermondsey and the Croydon tramlink.

⁴ Highways England Lower Thames Crossing Pre-Consultation Scheme Assessment Report
https://highwaysengland.citizenspace.com/cip/lower-thames-crossing-consultation/supporting_documents/Scheme%20Assessment%20Report%20%20Volume%201%20%20Executive%20Summary.pdf

⁵ <http://www.theguardian.com/society/2016/feb/07/childhood-obesity-national-emergency-jeremy-hunt-health-sugar-tax-jamie-oliver>

⁶ Health Inequalities in London report
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/467805/Health_inequalities_in_London_Oct_15.pdf

⁷ <http://www.bettertransport.org.uk/sites/default/files/research-files/Improving%20local%20transport%20helps%20the%20economy%20-%20experience%20from%20the%20LSTF.pdf>

Providing new light-rail links across the river, with the option of parallel walking and cycling routes, would provide real regeneration benefits through direct connections from emerging neighbourhoods to London's employment centres that would be available to all.

We therefore call on TfL to abandon plans for new road-led crossings at these locations and to explore sustainable alternatives, which could include

- new cross-river rail and/or light rail links, particularly to address the lack of a station at Thamesmead
- investment in environmental and design improvements to existing roads to reduce air pollution and improve safety
- improving provision of sustainable modes on the existing road network, encouraging modal shift and making better use of capacity
- joining up with other initiatives to shift distance freight to rail and manage on-road delivery times
- exploring a wider approach to demand management including road user charging / congestion charging not exclusively at new crossings.

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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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