

## River Crossing Consultation – Response from Campaign for Better Transport

To the Mayor and Transport for London

1. Campaign for Better Transport is strongly opposed to the proposed Silvertown Road Tunnel because it would lead to growth in both the volume of car traffic and the share of travel by car. We are opposed to a new ferry at Gallions Reach as it is likely to create travel patterns that might later be used to justify a new fixed link at the same location – either a bridge or a tunnel – which we would oppose for the same reasons as the Silvertown Tunnel. However, we have no objections to new river crossings in general and in the past have supported crossings that have been built for public transport, pedestrians and cyclists.
2. All three proposals – a Silvertown Tunnel, a ferry at Gallions Reach and a possible fixed link at Gallions Reach – work against the positive direction of change in London travel patterns that was established in the 1990s and 2000s. This has seen substantial reductions in motor traffic on London's roads, accompanied by a major increase in the share of journeys by public transport and cycling. London has shaken off a reputation for shabby, under-invested public transport and is beginning to tackle the domination by motor traffic of its streets and public spaces. It has shown during the 2012 Games, and in some of the areas that would be most affected by these river crossing plans, that major transport demand can be met expressly by reducing car travel and by encouraging other modes. By contrast these river crossing proposals would encourage growth in motor traffic (indeed they are designed to do so) and in transport planning terms are perverse and retrograde.
3. It would be ironic if the substantial development opportunities in East London were now to be wasted by creating car dominated development and travel patterns. There are other signs that this is happening: some of the development schemes completed in the Royal Docks and at Gallions Reach have car parks several times larger than the buildings they serve. Many proposals for new developments in these areas also include plans for hundreds of car parking spaces. Some landowners and developers are arguing for road-based river crossings principally to serve their developments. But their interests are not synonymous with those of the wider economy, of communities in the area or of a modern urban environment capable of competing for investment with progressive cities elsewhere.
4. Some developers may underestimate the extent to which people will use high quality public transport if it is provided. The large car parks at Westfield Stratford are in fact under-used and it is reported that the owners of Canary Wharf are planning to put some of its parking spaces to other uses. It is starting to be more widely understood that modern urban development benefits from access by other means than the car and from an environment that is not car dominated.
5. Crossrail will not be completed until 2018. It is certain to have a major impact on the pattern of public transport travel in east London but it is not clear exactly what that impact will be nor what transport project will best complement the new travel patterns. At any rate, the aim should not be to provide some parity between public and private transport but to ensure that a very large majority of journeys are made by sustainable means.

6. We have looked at TfL's papers on Assessment of Needs and Assessment of Options. The need for these river crossings has not been clearly identified in these documents. The Assessment of Options, paragraph 1.8, claims that the need for the river crossings has been set out in Policy 6.4 of the London Plan. It has not. Policy 6.4 is about improving the public transport system and increasing public transport capacity but these river crossings are intended for general motor traffic. For this and other reasons we would argue that the proposed crossings do not comply with national or regional planning and transport policy including the National Planning Policy Framework, the London Plan and the Mayor's Transport Strategy.

7. It is not clear to us how the proposed crossings, and the Silvertown Tunnel in particular, would meet the objectives and the principle needs that are claimed for them. For example:

- In the last decade the additional travel demands of a larger population and economy in London have been met by a growth in public transport use and cycling while car use declined. Significant additional capacity has not been provided for general traffic yet the economy has grown substantially.
- New roads, and river crossings particularly, will not reduce congestion because extra traffic is certain to be induced by the additional road capacity (see for instance the conclusion of the 1994 SACTRA report 'Trunk Roads and the Generation of Traffic' and the fact that traffic more than doubled when the Blackwall Tunnel was enlarged from two to four lanes).
- Attracting investment and economic activity requires high environmental standards and an ability to compete with other urban locations but the river crossings would be part of an essentially mid-20<sup>th</sup> Century pattern of car-dependent development that increases traffic domination, reduces air quality, increases noise pollution and creates worse conditions for walking and cycling. In short, new road crossings would degrade the environment and reduce the ability to compete. A further SACTRA report on Transport and the Economy in 1999, concluded that, rather than attract it, new roads may allow economic activity to leave an area.

8. The scheme's supposed objectives of improving the efficiency of the highway network, supporting existing and encouraging new businesses, supporting the provision of new public transport, minimising adverse impacts on health, safety and the environment, and achieving value for money would all be better served by measures to reduce demand for car travel than by providing new capacity. There is no logic in claiming that the proposed river crossings would meet these objectives when the evidence suggests the opposite.

9. In fact we would argue that the Silvertown Tunnel is completely at odds with those objectives. The new river crossing, doubling the number of traffic lanes across the river at North Greenwich from four to eight, will increase congestion, rather than relieve it; will encourage traffic so reducing the efficiency of the road network; will work against public transport, walking and cycling; will fail to optimise conditions for economic activity and will have a damaging impact on health, safety and the environment. We would also argue that it would be illegal on air quality grounds because it will increase pollution in areas already in legal breach of EU standards.

10. The assessment of options appears to have been a subjective and unscientific process designed to achieve a result that has been chosen in advance. Each option is considered on its own and given a rating on a seven point scale that is subjective and contentious. The difference between 'slightly' and 'moderately' negative or positive is negligible and largely meaningless when conducting a paper exercise of this kind but can lead to widely different perceptions of the options.

11. Genuine alternatives to these river crossings have not been properly considered. For example, the merits have not been assessed of one obvious and largely well-tried option, a package of measures including the following that could be implemented together:

- A demand management mechanism, such as road user charging
- A programme of smart measures and walking and cycling improvements on the road network
- Public transport improvements
- New river crossings for public transport, pedestrians and cyclists but not general road traffic.

12. Substantial questions remain about the cost of the river crossings and the proposed tolling arrangement. In a paper submitted to its Board in 2009, TfL said the cost of Silvertown Tunnel would be £300 million. Now it is said to be 'around £600m' (the River Crossings consultation leaflet). Will the price have doubled again in another four years? Will the tolling regime produce sufficient income to cover the construction costs? Which other river crossings will have to be tolled?

13. The consultation exercise is flawed and misleading. It is based on a false proposition: that creating additional road capacity relieves and does not aggravate congestion. It asserts some benefits but does not explain the damaging effects of the river crossings. It fails to set out proper alternatives. It will not stand up to scrutiny. This is not a consultation but a promotion exercise.

14. Finally, we find it shocking that in 2013 – after so much debate and when, belatedly, the case for better walking, cycling and public transport conditions has been widely accepted by much of London's political and transport establishment – the Mayor and TfL should hope to proceed with projects for river crossings that have nothing to do with sustainable transport but are clearly intended to increase the share and volume of motor traffic.

January 2013

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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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