LONDONASSEMBLY Green Party Group

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River Crossings Consultation,
Via email to rivercrossings@tfl.gov.uk

Dear Sir/Madam,

Thames River Crossings - RESPONSE TO CONSULTATION

As a member of the London Assembly I am writing to formally respond to Transport for London's consultation on the proposed new Thames river crossings in east London.

Before outlining my objections to the proposed Belvedere Bridge and Gallions Reach crossings and my support for retaining the Woolwich Ferry, I will highlight some serious shortcomings in this consultation process.

Consultation Process

TfL has failed to provide the public with adequate information about the potential for the proposed crossings to adversely impact on the quality of life, ease of travel and health of residents in the affected areas and beyond, instead dwelling overwhelmingly on the possibility that its chosen schemes will bring a raft of benefits:

> New river crossings would connect people, businesses and communities with each other and with jobs and services. They would help to manage the impact of population growth, reducing congestion and making journey times more reliable. They would also help London's growing economy by better connecting businesses, improving access to jobs and encouraging development.

(TfL river crossings consultation webpage)

A misleading, one-sided picture has been presented and discussion of the potential negatives of new road crossings is minimised. The following information on charging scenarios and traffic flows which TfL generated as part of its Silvertown Tunnel modelling work was only sent to me in private correspondence by TfL on 22nd September 2014, after the consultation's original closing date, and was not given to the public to consider before the deadline for this latest stage of consultation:

Definition of scenarios
The data shows 2012 base flows and 2021 reference case flows compared with 2021 no charge and 2021 central case flows.

The reference case assumes that the Woolwich ferry will be replaced (retained as a free service with 30% additional capacity) and no new highway river crossings will be provided.

The no charge and central case scenarios assume that the Silvertown Tunnel is constructed as a dual two-lane connection, and there is a replacement of the Woolwich ferry with a new charged ferry (with 30% additional capacity).

Under the central case tested, user charging is implemented to manage demand for the Blackwall and Silvertown Tunnels and their approach routes. Both the Silvertown and Blackwall Tunnels assume a charge at the same level as the Dartford Crossing in the morning peak northbound and the evening peak southbound. A charge of 50% of the Dartford charge applies to vehicles travelling in the contra-peak directions, and in both directions in the inter-peak period.

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Overview of predicted daily traffic flows
The following table illustrates the main river crossing daily flows (12hr) for the scenarios described above;-

	Base (2012)	Reference case (2021)	No charge (2021)	Central case charge (2021)
Northbound	31758	34278	43149	36729
Southbound	37973	41450	48925	42321

These figures give a very different picture of how much traffic will be using the new crossings if there is no charge. The impacts would be much greater on both congestion and also pollution. This may well have influenced the responses to the consultation which TfL has received.

TfL should also have carried out traffic modelling beyond 2021 as the modelling for the Thames Gateway Bridge (TGB) predicted that traffic would not double until a year after completion - 2022 in the case of Silvertown - and that it would keep growing for up to 5 years after the end of the time periods looked at in the TGB modelling.

Impact of proposed schemes on air quality
Insufficient analysis of the potential environmental impacts of the proposed schemes has been undertaken by TfL at this crucial stage. The Environmental Options paper states (page 7) *'A high-level baseline data-study has been undertaken…further data collection would be undertaken prior to any formal Environmental Impact Assessment undertaken for the selected option, but it is not appropriate to undertake a detailed level of study at this stage.'*

TfL is assuming that one or more of its options will be carried forward. Had the findings from a robust, detailed environmental study been provided at this stage, it is a very real possibility that none of its proposals would gain public approval due to revelations over the potential unacceptable environmental and health impacts.

On page 9 the paper states *'The emissions assessment is not a formal environmental impact assessment as it is being carried out while there are still 26 options being considered. For this reason, concentrations of pollutants are not being examined. Assessment of overall residual impacts is not included at this optioneering stage due to the high level assessment of emissions impacts. It is expected that a detailed modelling and a full DMRB and WebTag compliant air quality assessment will be undertaken at the next stage. The residual impact scores for the rest of the environmental topics are provided to allow the effects of each option to be compared, but the scale of impacts is not comparable between topics due to uncertainties and data gaps, and no weighting to different topics has been given either.'*

TfL's judgement that it is 'not appropriate' for a more detailed analysis to be carried out at this stage is negligent. Public Health England this year published data that attributes 98 deaths and 1322 life years lost annually in Newham to anthropogenic $PM_{2.5}$ – see page 15 of https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/332854/PHE_CRCE_010.pdf
The danger to human health of these schemes is clear yet page vi of the Environment Options paper accepts '…there is the possibility of increases in mono-nitrogen oxide emissions in Newham for the tunnel and bridge options at Gallions Reach which could influence the concentration of nitrogen dioxide in the area.' TfL is leaving the door open for Newham's poor air quality death toll to escalate through more roads, having decided that only a rudimentary, high-level analysis is needed at present.

The data used by the London Air Quality Management model currently assumes a near-uniform increase of between +2.8% to +3.1% in traffic volumes of all types on major roads between 2012 and 2020. However, the Mayor's Infrastructure Plan (based, according to TfL, on 'a strategic transport model for London') assumes that car KMs driven will change by -1% to over +25% between 2011 and 2031, with significant variation across the region. TfL should have explained to the public the disparity between the LAQM model and the modelling which informed this stage of consultation so as not to present a misleading picture on air quality impacts of its various schemes to Londoners. I only obtained this information through an in-person meeting with TfL officers.

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Contravention of London Plan policies
On page 113 (Table 14-2 - Impact of Options on Borough Emissions) a 2-10% increase in NOx is described as a 'slight adverse' impact of the proposed new schemes. London Plan policy 7.14c on Improving Air Quality states that any new developments should 'be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).' Newham has declared several of its major roads as AQMAs and a 2-10% increase in NOx directly contravenes London Plan policy 7.14. **Only air quality neutral developments should be under consideration.**

Potential EU fines for breaching legal limits for emissions
In a meeting with TfL's Managing Director of Planning she informed me that even if TfL's schemes were found by its environmental modelling to be likely to pollute east London's air yet further, this would not be viewed as a reason not to proceed. Given the constraints of European law on what is an acceptable level of air pollution, I don't agree with her view. The law on air pollution is currently being tested in the courts and it is not clear whether traffic generating developments which damage the health of Londoners are going to be legally acceptable.

Should the Mayor and local authorities support river crossings schemes which subsequently cause London to exceed EU pollution limits, both would potentially incur fines. These penalties could severely impact on local authorities' ability to deliver services.

Emissions scenarios
TfL's assessment of the potential NOx increases caused by the various options is predicated on the assumption that the crossings would be tolled and that some lanes would be reserved for buses to use. There should also have been an assessment of potential NOx increases based upon the crossings' full, un-tolled potential capacity - there is no guarantee that tolls would not be removed or bus priority cancelled under a subsequent administration an 'adverse' scenario of > 10% increase in NOx could eventuate.

Impact of road capacity increase on human health – relevant research
There exists an extensive and respected body research on the adverse effects on human health of increasing road capacity. One relevant report is 'Degradation in urban air quality from construction activity and increased traffic arising from a road widening scheme', report by Anna Font, Timothy Baker, Ian S. Mudway, Esme Purdie, Christina Dunster, Gary W Fuller, available at
http://www.sciencedirect.com/science/article/pii/S0048969714010900

Its key findings:

- Local air quality deteriorated after completion of a road widening scheme in south London.
- The EU PM_{10} limit value (LV) was breached during construction.
- NO_2 LV was breached after scheme due to increased cars, taxis and LGVs.
- Increase of pro-oxidant components in the PM coarse mode after the road widening.
- Mean PM_{10} emission factor for the construction phase was 0.0022 kg m^{-2} $month^{-1}$

TfL's consultation has not engaged with the findings of this research, despite their direct relevance to the road capacity increases it is proposing through its river crossings schemes.

Traffic impacts of proposed schemes
Congestion reduction and improved journey time reliability are two of the benefits that TfL has ascribed to its proposed new river crossings schemes. Research commissioned by the Department for Transport in 1994 entitled 'Trunk Roads and the Generation of Traffic' concluded "An average road improvement, for which traffic growth due to all other factors is forecast correctly, will see an additional [i.e. induced] 10% of base traffic in the short term and 20% in the long term". The strong likelihood that the new river crossings could induce new traffic in this way has been downplayed in TfL's consultation literature and there is no reference to it in the modelling.

When asked in person to provide an example of a crossing or link road that has not led to induced traffic, senior TfL officers were unable to do so.

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Further relevant research has been produced by the Victoria Transport Policy Institute - http://vtpi.org/gentraf.pdf (April 2014). Also of note is the planning inspector's conclusion from the Thames Gateway Bridge enquiry – 'I have concluded that, on balance, the scheme would be likely to cause increased congestion' *(9.187)*

TfL's traffic models have also taken projected levels of traffic to 2021 – with large increases - as the base case, rather than current levels. TfL should plan for a future where motor vehicle flows are significantly lower than current levels, rather than accepting that more vehicles will be on our roads.

TfL projections are very high when compared to the actual experience of the last 14 years. Given the long track record of DfT and TfL making inaccurate projections, I would like to see TfL publish the modelled impact of the river crossings on current levels of traffic. It may well be that there would be more dramatic increases in traffic levels on key roads and less falls on other roads, as a result of having a lower baseline of traffic in East London. This might well have impacted on how people living in the area perceive the TfL case for the crossings.

Failure to consult on public transport or cycling schemes concurrently

TfL's 'Responses to Issues Raised' document stated 'there is a strong appetite within the public and stakeholders for TfL to consider crossing improvements for cyclists, pedestrians and public transport users'. However, TfL has not acted on this feedback. It is not offering any public transport alternatives to be judged alongside its road crossing proposals. Nor has it carried out research into road pricing and sought the public's views on this alongside its road-building schemes.

The Environment Options paper states 'TfL estimates that Newham is a Borough with a very high potential for increasing cycling, due to its flat topography, density and the proximity of services to where people live' and also comments on the borough's low incomes have resulted in low car ownership. Newham is also the local authority with the highest proportion of people commuting by public transport (65.5%).' Given Newham's significant cycling potential, the limited role of private cars in the borough and its population's heavy use of public transport, investing in cycling and public transport infrastructure is clearly more suited to the local context than a road scheme likely to make Newham a conduit for through drivers from outside of London or other parts of the city. The scheme will pollute and congest the area heavily whilst benefitting locals minimally.

There are various public transport options on which TfL has not consulted the public. A London Overground extension from Barking Riverside to Thamesmead and Abbey Wood would link up to Crossrail and transform these isolated areas and this should have been put to the public at the same time as road crossings. An option to extend the DLR to Thamesmead and/or Abbey Wood making use of any Gallions Reach crossing should also have been consulted upon. It is very disappointing that TfL have not commissioned studies into this option and provided findings to the public at this stage. Had detailed plans for new cross-river bus routes been shared, members of the public would have been able to gauge the usefulness of any new crossings to them personally. However, new bus links are only discussed in general terms. Finally, whilst TfL's consultation webpage pledged that a Gallions Reach fixed link crossing would be accessible to all road users, inadequate information has been provided about how pedestrians and cyclists would be protected from the elements, kept safe and provided with a link that was appealing and enjoyable to use at a point where the Thames is well over a kilometre wide.

No details of tolling regime

It has not been made clear in any of the stages of TfL's river crossings consultation thus far whether the public would be able to vote to reject tolls but retain new road river crossings. This should have been made explicit.

TfL has previously stated "There is currently no funding set aside in TfL's budget for the major infrastructure projects outlined in this consultation. This means that in order to deliver them we would need to identify a means

of paying for them" and it is re-affirmed on the current consultation webpage that vehicles would be charged to use the new crossings. TfL has previously confirmed its intention that users of the Blackwall Tunnel would also be subject to a charge to pay for new crossings.

However, little detail is provided on the consultation web page about how much drivers would be expected to pay to use any of these crossings. The earlier consultation on the road river crossings found that the tolls would

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prove highly unpopular with the public. Whilst I support smart forms of road pricing, TfL should be providing full details of the charging regime now, rather than holding this information back until a later date when it hopes to have secured approval for its favoured schemes. The public cannot make an informed decision on any of the schemes without this data.

TfL did not answer in a timely way my questions relating to a separate public consultation on the tolls and the possibility that a future Mayor may decide to abandon the tolls, or significantly lower them. It is ultimately a political choice, as is the possibility that the Government could pay for the crossings, as they have with other road schemes around the country. TfL have only published modelling for a scenario in which all the river crossings are tolled and around half of the lanes being built are then dedicated to lorry/bus traffic only. As all these decisions are being made in a separate formal consultation by a future Mayor, this is clearly a false prospectus which is being offered to the people of East London. I regard the consultation as invalid, unless TfL also produces traffic modelling for the river crossings showing the impacts on the road network if they are un-tolled and used to their full capacity.

Misleading claims on river crossings' potential to create new jobs
The Atkins report predicts that the Silvertown Tunnel and the Gallions Reach bridge would support up to 34,000 total permanent jobs. No detail is provided, however, about which sectors the jobs would be in. TfL appear to be predicting that between 6-9am, around 10,000 vehicles would use the newly tolled roads across the river. This apparent mismatch between the 34,000 supported jobs and the much lower levels of commuter traffic is not explained. I can only assume that the Atkins Report is assuming a much higher traffic flow across the river, than TfL are predicting.

Misleading claims on river crossings' potential to create new housing
The Atkins report questions the Mayor's housing numbers and claim they are far too optimistic. Atkins lower the expected house building numbers, then say the crossings will increase them. First, they claim that the Mayor will only be able to deliver 70% of the new homes he is predicting for the area by 2025. That is then their new starting point, with the river crossings bringing forward an additional 18,000-23,800, which brings us (more or less) back to what the Mayor is predicting.

The report predicts that the jobs will mostly be around Canary Wharf, the Royal Docks and Stratford, whilst the biggest potential for housing is in Greenwich and Bexley. It flags up that Newham and Tower Hamlets on the north side of the river suffer from higher unemployment than anywhere else in East London and they also have the biggest employment opportunities on their doorstep. It then recommends that we build road crossings so that people can get access to these jobs from Bexley in south London which has a third of the unemployment suffered by those boroughs on the north side of the river.

Atkins calculates that Bexley and Greenwich could potentially be able to build up to 29,000 extra dwelling units as a result of the increased 'connectivity' which comes from the proposed road bridges. The logic being that the 72,000 people who come to live in these new buildings will have easy access to car parking, so that they can take advantage of the newly built road crossings. I don't think that these assumptions are reflected in the TfL traffic modelling, nor do they reflect the car parking standards in the London Plan.

Objection to Gallions Reach Ferry
TfL's consultation webpage acknowledges that 'some traffic increase is possible' in Thamesmead, Belvedere and along the A406 with a Gallions Reach ferry. This scheme would also pave the way for the introduction of a bridge at a later date.

I should also like to highlight the potentially overwhelming increase in local traffic that this project and Crossrail together could bring about, considering that Crossrail trains will terminate at Abbey Wood Station. It should be borne in mind that Crossrail is scheduled to open in 2018, one year after the earliest date for delivery of the opening of a Gallions Reach Ferry.

Objection to Gallions Reach Bridge
The projected cost of this project is listed as £350m - £600m on TfL's consultation webpage. These projected costs are so elastic as to raise serious doubts about whether TfL has properly investigated the finances behind this project. No explanation is given as to the reasons for the margin of uncertainty around the bridge's costs.

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The potential for traffic to increase with this scheme is unacceptably high. The A2016, A406, A13 and east and south east London in general could see widespread traffic increases and this would negate any of the congestion-relieving benefits of the scheme itself. TfL's own traffic impacts report states 'It can be seen that there is a large increase on roads approaching the new crossing, on Eastern Way, Bronze Age Way and on the North Circular.'

The report also states 'The introduction of a new charged river crossing reduces congestion by relieving alternative cross river routes with congested hours falling by 90 hours. At a borough level, Greenwich experiences a fall in congested hours (4%), while delay in Bexley increases (3%).' Whilst one borough may benefit, the congestion problem is merely shifted to a different borough.

Support for Woolwich Ferry

TfL's previous consultation showed that 55 per cent of Bexley residents and 54 per cent of Greenwich residents either support or strongly support a replacement ferry at Woolwich. The Mayor and TfL should be taking this forward as their preferred option.

The Woolwich Ferry is a much-valued link which is well-used by local cyclists and which is already an integral part of east London's transport infrastructure.

Unlike a road crossing which could not be completed until at least 2022-2025 or the proposed Gallions Reach ferry which could not open until the early 2020s, the Woolwich Ferry already transports thousands across the Thames daily and modernisation could be completed by 2020.

Modernisation works would cost approximately £100m-£200m as opposed to £150m-£250m for a Gallions Reach Ferry or £350m - £600m for a Gallions Reach bridge. We should invest in existing services before embarking on expensive and disruptive new schemes.

The Woolwich ferry is well used by cyclists and pedestrians and there are bus terminals at either side of this river crossing which link it to the existing road network.

Opposition to Belvedere Bridge

This scheme would cost from £500m-£900m to build. The public are entitled to greater accuracy than this around the projected costs of large infrastructure projects.

The traffic impacts of this scheme would result in potentially increased traffic on the A2016 in Belvedere and Thamesmead and the A13 in Rainham and Dagenham. Local roads would also be subject to traffic impacts which could overwhelm them and see neighbourhoods become rat-runs for through traffic.

I thank TfL officers for coming to City Hall to answer my outstanding questions in person and for granting an extension to allow me time to analyse the information provided. That co-operation has been very helpful. However, I would still like to put on record that I was not able to provide this information to my constituents to enable them to make informed responses to the consultation prior to the deadline of 18th September 2014.

I hope that my input is now taken into account by TfL.

Yours Sincerely,

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