

Options for a New Lower Thames Crossing

Sustrans response to Department for Transport consultation

Summary

1. Sustrans is a leading UK charity, working with local communities, policy-makers, departments of all UK governments and partner organisations to enable people to travel by foot, bike or public transport for more of the journeys we make every day. We welcome the opportunity to respond to this consultation.
2. Sustrans is concerned that the only proposals put forward by the government for addressing capacity issues on the existing lower Thames crossings are to build a new road crossing, the fourth since the 1960s. Evidence demonstrates that new roads deliver poor value for money, lower than expected economic benefits and create a spiral of increasing traffic, congestion and demand for road capacity. In terms of local economic benefits or connectivity, there is no reason to expect that a new crossing will deliver outcomes that the three previous crossings (opened in 1963, 1980 and 1991) have not.
3. It is perverse to do the same thing repeatedly and expect different results each time. Sustrans urges the government to recognise that the benefits of new roads are limited and short lived, and to invest in alternatives. We call on the government to:
 - Consider and consult on a full range of non-road alternatives to the proposed new lower Thames road crossings.
 - Invest now in measures to tackle capacity issues by reducing use of the existing crossings for shorter car trips and improve non-car options.
 - Prioritise future investment in alternatives to new roads, including public transport, walking, cycling, smarter choices, passenger and freight rail options.
4. It is unclear why government is consulting on routes for a new lower Thames crossing now, raising expectations and focusing debate on road-based options while leaving the funding and delivery of any scheme to future governments. Sustrans urges the government to abandon plans for a New Lower Thames Crossing, and to work with local partners to develop a more sustainable and integrated transport strategy for the lower Thames area.

Key points

5. Sustrans is very disappointed that the only options considered in the consultation are for new roads. Although we understand that some other options including passenger rail were included in the 2009 study, it is unclear whether a full range of alternatives were considered, including smarter choices measures to reduce car use for shorter journeys and rail freight to reduce demand for road haulage. **Sustrans urges the government to consider and consult on a full range of options including alternatives to new roads.**
6. Sustrans is also concerned about how traffic growth is treated in the document. It is not reasonable to assume that traffic growth will continue unabated if a new crossing is not built, nor that any new crossing will simply deal with existing capacity issues without increasing demand or reaching capacity again by 2041 (4.9). We note that options which would have generated a low level of traffic demand were rejected early in the process (3.6), implicitly acknowledging that the new links are expected to generate additional demand for road capacity.

7. Sustrans is also concerned that the consultation document exaggerates the likely economic benefits of new road options. The DfT's own advisers have noted that the economic benefits of new roads are smaller than is claimed, and benefits are typically short-lived because additional road capacity rapidly creates extra traffic.¹ The Eddington review urged a 'mode agnostic' approach to transport investment, considering options for tackling congestion including public transport and demand restraint.² Prioritising investment in new roads also risks diverting attention and resources available from more effective and lower cost interventions.
8. **Sustrans urges the government to invest in measures to improve alternatives to road use, particularly for shorter journeys** for which there are currently few practical alternatives, in order to reduce use of the existing road links (and the wider strategic road network) for local trips. Although the consultation document (section 4.6) suggests that the proportion of local work trips that use the crossing is relatively small at the moment, it is hard to see how the objective of increasing economic connectivity between the areas could be achieved without extra local vehicle trips adding to capacity demands on the crossings, unless alternatives are provided.
9. Evidence from previous studies demonstrates that, even on motorways, a significant proportion of vehicles are being used for relatively short journeys, especially in morning and evening peaks. For instance, the DfT DaSTS Corridor 10 study found that half of journeys on the M1 through Yorkshire, M18 and M62 were under 50km. Many of these were much shorter single junction trips (i.e. joining the motorway at one junction and leaving at the next), especially in built-up areas. The most significant factor in flow variation was the numbers of short distance trips, notably at peak times.³
10. Very similar trends are evident at Dartford. Over half of light vehicle trips and 20% of HGV trips are regional or local.⁴ The density of existing and new housing and employment developments, the barrier presented by the river and the absence of other crossings means that relatively short car trips from one side of the river to the other are likely to be an even higher proportion of total trips. It is likely that there would be significant potential to increase capacity on the existing links through smarter choices measures to reduce car use for short trips, shifting journeys onto rail and bus, and developing walking and cycling links particularly to public transport hubs.
11. The new HS1 rail link has created additional rail capacity just downstream, but the new infrastructure cannot be used for relatively short distance cross-river passenger journeys. It is unlikely that the impact of a link which opened in 2007 on travel patterns and demand for passenger rail would have been fully reflected in the 2009 study. The consultation does not reflect the anticipated benefits of HS1 in opening up the Thames Gateway while reducing demand for road haulage, especially given the ongoing development of the DP World superport nearby. **Sustrans urges the government to invest now in improving public transport, walking, cycling, passenger and freight rail throughout the Thames Gateway area.**
12. Sustrans notes the absence of adequate public transport, walking and cycling alternatives to car use for local journeys across the lower Thames. Bus and rail connections are poor, with typical journey times of over an hour and involving multiple changes, and the Gravesend-Tilbury Ferry has limited operating hours. It is not possible to cycle across the existing crossings, although free transport of cycles is provided under section 27 of the Dartford-Thurrock Crossing Act 1988. This is hardly satisfactory even for leisure use and presents a total barrier to using a bike for daily utility trips, for instance to and from work. Investing in these modes (from existing tolls or other sources) would be a far better investment than expenditure on new roads.

Responses to consultation questions.

Question 1. Do you agree that there is a strong case to increase road-based river crossing capacity in the Lower Thames area?

Disagree. Sustrans is concerned that increasing road-based capacity will simply create additional traffic and congestion, and will not address the key problem of the absence of non-road alternatives to the existing road crossings. Please see paras 4-6 above.

Question 2. Which of the following location options for a new crossing do you prefer?

None/other. Sustrans calls for investment now in smarter choices and other measures to reduce use of the existing crossing for shorter journeys to alleviate over-capacity in the short term, and for future investment in providing and improving non-road options including buses, walking, cycling, passenger and freight rail, rather than a new road crossing. See paras 7-11 above.

Question 3. 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.

This is a leading question which implies support for road options. Sustrans considers that the government's priorities can be delivered equally well by non-road options. Given current economic and environmental constraints, including the Climate Act, Sustrans considers that the government should prioritise carbon emissions and value for money and therefore abandon road options.

Question 4. 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?

As noted, Sustrans does not support a new road crossing, although we would welcome further discussion of how to provide a non-road link across the river.

Question 5. Do you wish to add any further comments

Please see main response above. We would welcome the opportunity to discuss this response further.

Contact details

For further information about this response please contact:

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¹ **DfT/SACTRA 1994** Trunk roads and the generation of traffic

DfT/SACTRA 1999 Transport and the Economy

² **DfT 2006** Eddington Study: transport's role in sustaining the UK's productivity and competitiveness

³ **DfT/MVA 2010** Corridor 10 trip length data

⁴ **DfT/Parsons Brinkerhoff 2009** Dartford River Crossing Study (Executive summary Para 1.29)