

Transport Planning Society

March 2016

Response to the Highways England Lower Thames Crossing Consultation

Introduction and Wider Context

The Transport Planning Society (TPS) is an independent institutional body in the UK, established to facilitate, develop and promote best practice in transport planning and to provide a focus for dialogue between practitioners and others interested in the field. Although our individual members may have differing views on a range of detailed issues, as a Society we consider that the broader issues raised and the importance of the proposal to London and the South East region mean that we are responding on the more strategic aspects of this proposal.

TPS strongly supports investment in transport infrastructure across modes as part of an overall approach which balances demand management and the creation of new capacity, and is always integrated with land use planning.

The Society has also called for greater consistency in the planning and funding of infrastructure at local as well as national level. It believes that planning for infrastructure needs to have clear and specific quality of life objectives, not just an assertion that investment must be good for the economy and then, subsequently, for people's lives. To this end a key focus for the Society has been appraisal, modelling and forecasting, and the development and use of WebTAG.

In our submissions to the National Infrastructure Commission on the Northern cities¹ and on London² we set out this context in greater detail. In the case of London we discussed some issues which are highly relevant here, the two most important are:

"The major challenges facing London and wider South East are undoubtedly the anticipated population growth and related job creation, the related problems of capacity constraints across infrastructure types and a long term problem of building too few homes to accommodate the growth in households."

"The provision of additional housing and related employment should be planned in tandem with upgraded and new transport provision and this must be placed at the top of any prioritisation assessment."

The rest of this submission deals with the key issues of principle in the appraisal of the current proposal.

¹ See <http://tps.org.uk/public/downloads/qg4X9/NIC%20Submission%20Northern%20cities.pdf>?

² See http://tps.org.uk/public/downloads/at_XM/NIC%20Consultation%20-%20London%20TPS.pdf?

Overview of the LTC proposals

As we have said earlier TPS does not comment on the detail of individual schemes. However, this Highways England (HE) consultation raises several issues which are of far wider concern and it comes at the beginning of what are likely to be a series of appraisals in coming years. Our issues of concern relate to the way in which major schemes should be assessed and in summary are:

- 1) **Option assessment:** there is no real evidence of optioneering outside alternative alignments – key in our view if WebTAG is to be complied with.
- 2) **Interactions with planned schemes nearby** (in particular TfL river crossings) are not included and this is an essential part of good practice, going back to SACTRA recommendations.
- 3) **Interactions with TfL's planned user charges** in East London not represented, we consider an area wide charging regime needs to be in place – this should be part of the Option Assessment and Appraisal.
- 4) **Appraisal against objectives** is not clear and appears misleading in relation to present day conditions. It is essential to the Strategic case for any transport scheme, as in the DfT and Treasury guidance.
- 5) **Economic impacts not adequately assessed** – for example whether the orbital connection benefits would arise and the possible weakening of a focus on more central locations with more sustainable transport and the undermining of radial patterns of travel.

Option assessment

We were unable to identify a clear setting out of realistic options (including non-road or combination schemes, multi-modal or freight) and a preliminary assessment of their relative performance. This is a requirement if the appraisal is to be WebTAG compliant. The assumptions appear to be that large scale growth which has much greater car dependency than elsewhere in London will form the basis for transport and land use planning in this area. This should trigger further optioneering since the impact will contradict the stated scheme objectives. The strategic objectives also need to be more clear and have greater influence on the scheme and alternatives to it.

Interactions with planned schemes nearby and TfL's planned user charges

Given that TfL are consulting on options for new highway links across the Eastern part of the Thames and proposing new and binding charges for their use, this should have been included in the modelling. However, the point is that public money is being used to pursue schemes in isolation which clearly interact with each other. Without this the appraisal will be flawed and misleading.

It is also the case that TfL are proposing binding charges to manage demand on any new crossing. If HE does not think these will be binding, or they have reason to believe they will not be part of the final approved scheme they should explain why.

Our preferred option is to assess the impacts of the HE proposals and properly prepared alternatives within a charging regime across the sub-region. This is likely to include options for East London which would then need to be reflected in proposals for the sub region

containing the LTC proposal. This, and the consideration of alternatives, will have a major impact on the overall demand forecast.

Appraisal and presentation of objectives

In our view it is difficult to see how the business case can be line with what WebTag recommends. Firstly, there is no multi-modal analysis, nor is there anything on demand management. So, for example, alternatives for transporting cross-channel freight to the Midlands and beyond are not considered. Secondly, there is no consideration of land use and transport integration. It is simply assumed in the reference case that thousands of homes and jobs that are car-dependent will be delivered in this part of the Thames Gateway. While the narrative focuses on the need for crossings to support these homes and jobs, alternative options involving more sustainable urban development patterns are simply not considered.

Scheme objectives and presentation of the case for the scheme

There are several elements that set a worrying precedent in how schemes are presented to the public. The objectives state that congestion relief at Dartford and resilience are core objectives of the scheme. Yet the forecasts in the report state that with LTC in 2041 Dartford will carry more traffic than it does now. This means that it will not meet the stated objectives. A more accurate approach would be, for example, to state that the core objective of this scheme is to provide additional road capacity to cater for the growth in car-dependent development and that the overall impact of this particular package of land use and transport planning reduces the cross-river resilience and increases congestion, including elsewhere on the non-HE network.

Alternatively it could clearly stated that the proposed road user charge is not high enough to manage demand down to a level where there is some spare capacity for resilience, and that drivers can expect charges to be significantly higher than those modelled or suffer worsening delays and unreliability.

There is a strong focus in the narrative on the need for the crossing to cater for cross-channel freight, because clearly the economic arguments for European trade are stronger than for cross-river shopping trips to Lakeside. Yet the Select Link Analysis plots presented in the modelling report clearly show that the proportion of demand forecast to come from the channel ports is actually very small indeed. The vast majority of demand appears to be generated demand (and some additional trip generation from car-dependent development).

While the crossing is formally is presented as a dual carriageway crossing high lane capacity, it is appears from other parts of the documentation that the tunnel is being planned as a 2 x 3-lane crossing. Obviously opening the third lanes in the tunnel at a later date once the more modest scheme has been approved (or built) is far easier than modelling their impact as part of the core proposal. If the capacity is there its impact should be modelled, in particular the associated road capacity increases needed across the wider area.

All of these issues should be made clear to the public during the consultation, with supporting evidence. Not doing so risks a further erosion of trust in the transport planning profession and is thus of particular concern to the Society.

Wider economic impacts

TPS has previously stated concerns about the way that the DfT incorporated wider economic impacts into WebTAG – it focusses too narrowly on inter-urban connections, and specifically excluded sub-regional public transport networks that were the focus of substantial previous agglomeration research. The resulting guidance is both conceptually weak and also very sensitive to small changes in assumptions, for example on weighting. For this reason therefore transport planners should be very careful when applying the methodology.

In the case of the Lower Thames Crossing, according to the WebTAG data book, many of the surrounding districts have a disproportionately high level of employment in the consumer services sector. This sector is dominated by low wage and precarious employment, so for example, what would be the incentive for a lower paid service sector employee to drive over a charged crossing to work at Lakeside when they can drive to the same job at Bluewater? There may be some arguable benefits to higher income consumers through improved choice, but this is surely marginal compared to real benefits in productive industries.

Conclusions

While we make no detailed comments on scheme design we consider there are several high level issues raised by this proposal and it is important to comment since it is early in the development of the HE's approach to appraisal. In this context we would like to see the improvements we suggest implemented, in particular:

- Full and fair option generation (including sustainable modes and freight)
- Understanding of how land use and transport interact and more sustainable patterns of travel can be encouraged
- Greater clarity in setting wider and operational objectives
- Improved appraisal against those objectives
- Integration with other schemes and proposals, particularly those in LondonImproved analysis of the economic impacts and alternatives