



London Cycling Campaign *draft* outline position for the Public Inquiry into the Thames Gateway Bridge

31 May 2005

Introduction

The London Cycling Campaign ('LCC') has been the voice of cyclists in London for over 25 years. As the principal users' group representing the interests of over 9,000 members and more than 650,000 people who cycle regularly in London, it welcomes the holding of a public inquiry into the proposed Thames Gateway Bridge ('the Bridge') and wishes to exercise the entitlement to appear at the inquiry during its September session to oppose the planning applications.

Status of document

This document has been drawn up in pursuance to the requirement by the Inspector to the inquiry for objectors to provide "an outline of their evidence and a list of the issues on which they would wish to cross examine the promoters' witnesses" by 31 May.

This requirement has been difficult to comply with as it has 'front-loaded' a great deal of preparation. While the LCC is the largest urban cycling campaign in the world, it has a only small number of paid staff and much of its work is carried out by volunteers including work on the Thames Gateway Bridge inquiry. It has not been possible to consider properly the volumes of proofs of evidence made available recently by TfL.

In addition, the objectors' expert reports have not yet been published making it impossible to conduct a detailed examination of claims made by TfL and to undertake decisions about what further evidence may need to be called to support the LCC's case. Similarly until the reports are published, it is not

possible to assess gaps in the information provided by TfL and we would wish to reserve the right to request such information following the publication of these reports.

In the circumstances, this document, though based on LCC policy and written by the LCC member who will be appearing at the inquiry, has not received the necessary approval of the Management Committee nor been put out to consultation with the relevant LCC Borough Groups. It has been issued merely to preserve the procedural rights of the LCC to put its case at the public inquiry as widely as it may feel fit rather than to state the LCC's definitive position.

The LCC therefore reserves the right to cover other issues in evidence that are not contained in this document and to disassociate itself completely from statements that are included. Similarly it reserves the right to or not to cross-examine TfL's witnesses on the areas of concern listed. Once the objectors' expert reports have been considered and there has been time for the Management Committee to be briefed on the issues the LCC will be able to issue a final and approved version of this document.

Background

The LCC may contend that the Bridge would be as bad for cycling in east London as the congestion charge has been good for cycling in central London.

The LCC may contend that the Bridge will be of negligible benefit to cyclists but that it may have disbenefits which have not been taken into account by TfL. In the circumstances it may not be considered as a multi-modal bridge that conforms to planning guidance.

The LCC notes that *Cycle Friendly Infrastructure* (DoT/IHT 1996) provides a list of five ways to improve cycling conditions and that motor traffic reduction is first in the order of preference and providing cycle lanes/tracks last. TfL has recently adopted this in its *London Cycle Design Standards* ("LCDS").

The LCC may contend that the very significant increases in cycling – TfL's figures show a 30% am peak increase in cycling over the charging boundary over 12 months – in central London was caused by the decrease in motor traffic and that a significant and corresponding decrease in cycling in east London is likely to result from the increase in motor traffic if the Bridge is built.

The report commissioned by TfL from the Transport Research Laboratory following the cyclist fatalities on Blackfriars Bridge entitled *Review of Procedures Associated with the Development and Delivery of Measures Designed to Improve Safety and Convenience for Cyclists* ('the TRL report') noted that:

- TfL has a lack of data to determine performance of cycle facilities;
- The majority of cycle facilities do not meet minimum widths recommended by guidance;

- “no systematic consideration of the needs of cyclists in the development of highway schemes that are not specifically for cyclists.” (7.2.2)

The LCC notes that the Thames Gateway scheme was drawn up before the TRL report was published and contends that the conclusions listed above are particularly relevant to the proposal for the Bridge.

Compliance with local, regional and national planning guidance

The LCC may contend that the Bridge fails to conform with planning guidance in relation to generation of motor traffic, providing benefits for cycling and regeneration.

The LCC may contend that the [motor] traffic models used by TfL are inaccurate in that they have underestimated the flows of private motor traffic that would use the Bridge and overestimated the reduction in motor traffic elsewhere resulting from diverting of journeys.

The LCC may contend that the “London Transport Strategy” model, used by TfL, which splits traffic into motor traffic and public transport modes fails to consider cycling and multi-modal (e.g. Bike & Ride, Bike & Rail, Bike & Boat) journeys and is hence inaccurate.

The LCC may contend that all the proofs of evidence and associated documents produced by TfL fail to distinguish between motorised and non-motorised road traffic (or mechanically and non-mechanically propelled traffic). The Road Traffic Reduction Act 1997, for example, contains a requirement, perhaps not as clearly drafted as it could have been, to consider the reduction of “local road traffic” which is defined in section 1 as: “traffic consisting of mechanically propelled vehicles on roads for which the Secretary of State is not the traffic authority”.

The LCC may show that the cycle facilities proposed on and around the Bridge do not conform with the draft DfT Local Transport Notes 01/04 and 02/04 on Walking and Cycling.

The LCC may call evidence to show that the proposed toucan crossings designed to enable pedestrians and cycles to negotiate junctions around the Bridge safely may well cause excessive delays to users and as such are likely to see very little use.

The LCC may present evidence that the data on future “accident” [sic] rates are unreliable and fail to consider the different risk exposures of Vulnerable Road Users to being involved in a collision and Killed or Seriously Injured. Further they have ignored the probable effects of higher motor traffic flows leading to lower cycle flows and hence significantly increased risk exposure to individuals creating a vicious circle.

The LCC may present evidence that previous attempts by TfL to mitigate the effects of motor traffic have led to some disbenefits for cyclists such as around the edge of the congestion charge zone.

The LCC notes that roads such as the A206 (Woolwich Road, Plumstead Road) and A205 which are predicted to see significant increases in motor traffic flows if the Bridge is built are part of the official London Cycle Network.

The LCC further notes that on these routes cyclists are not separated from motor traffic on “cyclepaths” and that any upgrade in provision for cyclists would not be possible with increased motor traffic flows and hence greater pressure on scarce road space. The LCC notes that even where there may be off-road cycle track alternatives (e.g. along the Thames River Path), most cycling commuters stay on main roads which are usually more direct and quick, as the alternatives are often aimed at leisure cyclists. The LCC may therefore contend that the Bridge is incompatible with the targets for an increase in cycling in the Mayor's Transport Strategy to be met in east London.

The LCC may contend that TfL has failed to give due consideration to the impact on the official London Cycle Network or on other roads with high cycle flows of the increased motor traffic flows that would result from the Bridge. The LCC may contend that this is based on a misunderstanding that cyclists only use official cycle network, which is made up of “cyclepaths” just as buses only use bus routes or trams are fixed to tramlines.

Alternatives

The LCC notes that there has been no real consideration of alternatives to a road crossing involving high flows of motor vehicles. There are no crossings east of Tower Bridge which allow people to cycle across or convey a bicycle on public transport (save for an infrequent shuttle bus on the Dartford Crossing).

The LCC may question the validity of the consultation and Environmental Impact Assessment in the light of the above.

The LCC may contend that a series of foot & cycle bridges across the Thames in the Docklands should have been considered along with orbital public transport improvements, such as a link between the DLR Woolwich extension and the proposed extension to Dagenham at Gallions Reach or a public transport, pedestrian & cycle only bridge.

The LCC may contend that investment in such schemes would do far more to boost accessibility than the Bridge without any of the drawbacks.

Regeneration

The LCC may contend that the lack of substantive consideration as to real alternatives makes the claim that the Bridge is essential for regeneration untenable.

The LCC may contend that the Bridge is not compatible with the concept of sustainable development and that only a significant modal shift to benign modes such as walking and cycling is in the light of the Government's target to reduce greenhouse gas emissions by 20% by 2010.

The LCC may contend that the Bridge would lead to community facilities such as hospitals and cinemas reassessing their catchment areas and therefore merging and centralising operations, increasing the need to travel by motor transport and hindering regeneration.

The LCC notes that quality of life issues are key to successful regeneration and may contend that the increase in motor traffic resulting from the Bridge would hinder this.

The LCC may present evidence showing how foot & cycle bridges of high quality designs can act as a catalyst to successful regeneration and act as a landmark.

Cross-examination of TfL witnesses

The LCC may wish to cross examine the following TfL witnesses:

<i>Witness</i>	<i>Areas for cross-examination</i>
<u>Henry Abraham</u>	Transport Policy
<u>George Kennedy</u>	Highway Engineering
<u>Richard Smith</u>	Traffic, Tolling, Public Transport and Appraisal
<u>Michael Adams</u>	Town Planning
<u>Bridget Rosewell</u>	Regeneration