

THAMES GATEWAY BRIDGE
PUBLIC INQUIRY

STATEMENT OF CASE

TRANSPORT 2000 (RICHARD BOWN)

22 March 2005

Linda Smart
Department for Transport
Local Authority Orders
Citygate
Gallowgate
Newcastle upon Tyne NE1 4WH

Dear Linda Smart

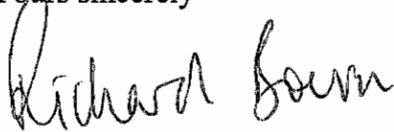
**Planning Inspectorate's References: APP/G5750/V/05/1174146 &
APP/E5330/V/05/1174147**

Thames Gateway Bridge

Please find the enclosed three copies of Transport 2000's Rule 6
Statement.

I understand that you will send copies to the applicant and the local
planning authorities and that we are required to send copies to the
statutory parties.

Yours sincerely



Richard Bourn
London Campaigner

Government Office
29 MAR 2005
for the North East

TRANSPORT 2000

THE NATIONAL ENVIRONMENTAL
TRANSPORT CAMPAIGN

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Transport 2000

Rule 6 Statement of Case

Thames Gateway Bridge

Ref:

APP/G5750/V/05/1174146 & APP/E5330/V/05/1174147

1. Transport 2000 is responding to the invitation to provide a Rule 6 statement and wishes to exercise the entitlement to appear at the public inquiry.
2. The letter of 19 January from the Government Office for London set out a number of matters on which the Secretary of State particularly wishes to be informed in relation to the application for planning permission for the Thames Gateway Bridge. Much of Transport 2000's statement of case, and our evidence to the inquiry, will relate to the second of these:

“The extent to which the proposal accords with national planning policy on transport set out in PPG13 – Transport, particularly with regard to :

 - i) the impact of the proposal on traffic generation and overall travel patterns having regard to the desirability of achieving development that minimises the need to travel, particularly by private car:
 - ii) maximising use by non car modes of travel, particularly public transport, cycling and walking:
 - iii) the impact of the development on traffic congestion in the local area.
3. If the transport claims made for the Bridge by its proponents do not bear rigorous scrutiny as we shall maintain, the regeneration, environmental and other claims made for the Bridge are unlikely to stand up either.
4. Our evidence will focus on the traffic model commissioned by Transport for London from the consultants Halcrow. We will demonstrate that it falls short of the standards necessary to support the proposal in two ways: (a) it does not give adequate evidence, support and information to demonstrate that the criteria fulfilled in paragraph 2 above have been fulfilled; (b) on those aspects that information is provided, it fails to take into account the guidance and policy issued by the government, and does not make use of the available evidence on impacts provided in research commissioned by the department for Transport and its predecessors.
5. In particular, we shall argue that there are serious shortcomings in the forecasts of traffic growth derived from that model and presented in Halcrow's Traffic and Transport Report. It will refer to the reports commissioned by the London Boroughs of Greenwich and Newham to test the conclusions of the Halcrow report.
6. Our evidence will consider the adequacy of Transport for London's definition of local traffic and the likely effectiveness of the proposed tolling regime in

restricting the use of the Bridge by non-local traffic. It will take into account the wider land use context and the land use planning implications of the Bridge itself.

7. Transport 2000 will contend that the predicted levels of traffic growth, if the bridge is built, are too low and that the bridge would have a much wider and more severe traffic impact than the Traffic and Transport report suggests.
8. If the predicted traffic levels are too low it follows that the predicted impact of the bridge on for example air quality, noise and health is also too low.
9. Transport 2000 will assess the adequacy of Transport for London's consideration of alternative proposals including an all public transport option or a bridge carrying rail based public transport instead of, or in addition to, buses. We will argue that Transport for London has not considered properly the case for providing a tram route across the river or considered at all the case for ultra-light rail. Nor has it considered associated policies designed to 'minimise the need to travel, particularly by private car', including aspects of undoubted importance such as road user charging, the wider use of 'Smarter Choices' (soft measures), the impact of reallocation of road capacity, and the procedures necessary and available to 'lock-in' benefits of capacity changes, all of which would have an impact on the case for the scheme, its design, and the time scale of any benefits delivered.
10. We will present evidence that it is perfectly possible to design a new river crossing which, at similar or less cost, would provide improved public transport access to employment opportunities but would have no adverse environmental impacts and would not increase traffic or congestion.
11. We will contend that Transport for London envisages an unnecessarily low proportion of public transport crossings of the bridge and an unnecessarily high proportion of crossings by car. We will argue that Transport for London should investigate available means of increasing the modal split of public transport (in the event that the bridge is built with capacity for general traffic which we argue it should not). We will test the claims that the Bridge will provide an effective pedestrian and cyclist route and argue that pedestrian and cyclist use of the Bridge would be negligible.
12. Transport 2000 will present its concerns about the quality of the consultation exercise conducted by TfL and will give evidence that another method of consultation, based on focus groups, would be a more valid test of local opinion and would address social inclusion issues much more effectively.
13. Finally Transport 2000 will question the claimed links between new road schemes (and the Thames Gateway Bridge) on the one hand and new jobs and economic regeneration on the other.
14. We hope the Inspector will understand that Transport 2000 will have to review a large amount of material produced by and on behalf of other organisations and prepare its evidence within a limited period. We cannot give an assurance that the

matters mentioned above are a comprehensive list of the issues that will be covered by our evidence.

LIST OF DOCUMENTS

Transport 2000 expects to refer to the following documents. Again however this list cannot be comprehensive. We are likely to need to refer to other documents in response to evidence presented by other parties and in order to pursue issues that arise during analysis carried out in the preparation of our evidence. We draw particular attention to the point mentioned in 4(a) above, that information on studies which (we trust) must have been carried out by the consultants, have not been published in anything close to the detail which would be normal practice. We anticipate that TfL will provide this material, which is certain to be voluminous, but probably only after we have drafted our evidence, and in this case there may well need to be reference to other evidence.

Transport for London

The planning application and all associated documents including the Environmental Statement and the Traffic and Transport Report.

Sustainability Report by Scott Wilson September 2004

Public Transport Statement November 2004

Thames Gateway Bridge Regeneration Strategy July 2004

In addition, in order to make a proper assessment of Transport for London's traffic and transport case for the development of the Bridge, Transport 2000 has asked Transport for London to provide the following information. We are unable to provide titles of the documents requested.

- A full set of technical reports on the modelling, development and calibration being unpublished internal documents held by the consultants or more detailed technical reports given by the consultants to Transport for London.
- Copies of all technical correspondence, drafts and emails between TfL and Halcrow about the interim and final model forecasts and assessments, of which only a summary appears in the Traffic and Transport Report.
- Reports and technical information on the proposed tolling system, its viability and alternative tolling levels.
- Reports of any other work carried out by or for Transport for London relating to the key questions in the ODPM call for evidence, ie :
 - achieving development that minimises the need to travel
 - maximising use by non-car modes of travel, particularly public transport, cycling and walking.
- Reports of work carried out by or for Transport for London relating to alternatives to the current proposal in respect of:
 - location
 - transport options including non road options and options that provide for rail based public transport.

European and international regulation and commitments

Council Directive 85/337/EC 'The assessment of the effects of certain public and private projects on the environment' June 1985

Council Directive 97/11/EC amending Directive 85/337/EC, March 1997

Council Directive 2002/49/EC 'Assessment and Management of Environmental Noise' 2002

Other current EU directives on air quality and noise

....

National and Regional Policy, including evidence and guidance on modelling and appraisal

Trunk Roads and the generation of traffic, SACTRA 1994

Impact of Highway Capacity Reduction, Cairns et al, Landor 1997 (commissioned by DfT and London Transport)

Transport and the Economy, SACTRA 1999

A New Deal for Trunk Roads in England, Department for the Environment, Transport and the Regions, July 1998

A New Deal for Transport: Better for Everyone, Department for the Environment, Transport and the Regions, July 1998,

Transport 2010: The 10 Year Plan, Department for the Environment, Transport and the Regions, July 2000

DTLR Circular 04/2001

Orbit: transport solutions around London, Executive Summary, prepared by KBR for the Government Office for the South East, November 2002

The Government's Response to the Transport Select Committee's Report Jam Tomorrow?: The Multi-Modal Study Investment Plans, June 2003

Secretary of State's Response to the Orbit Multi-Modal Study, July 2003.

Managing Our Roads, published by the Department for Transport July 2003

The Future of Transport: a network for 2030, Department for Transport, July 2004,

Feasibility Study of Road Pricing in the UK: a report to the Secretary of State, Department for Transport, July 2004.

Smarter choices: a report to the secretary of State, Department for Transport, July 2004

Changing Travel Behaviour: report of a conference at University College London (www.

Design Manual for Roads and Bridges, Volume 12, Section 2, Part 2.

WebTAG (www.webtag.org.uk) (as the DfT advice on modelling)

Climate Change the UK Programme 2000

Planning Policy Guidance Notes 1 and 13

The London Plan

The Mayor's Transport Strategy

The Mayor's Air Quality Strategy

The Mayor's Ambient Noise Strategy

London Borough of Greenwich

Emerging Unitary Development Plan

Report to the Planning Board of 14 December 2004

Jacobs Baktie: Review of Traffic Modelling
 Review of Public Transport Model Validation Report

London Borough of Newham

Unitary Development Plan

Jacobs Baktie: Summary Report
 Traffic and Transport Report Review
 Review of Assessment of Public Transport Options
 Review of Public Transport Model Validation Report

Independent reports

Thames Gateway River Crossing: a social, economic and environmental assessment, John Whitelegg for the Simon Woolf Charitable Foundation

A Solution Looking for a Problem. A review of Transport for London's outline proposals for river crossings in east London and their traffic impact, John Elliott Consultancy for Transport 2000