Response from the London Cycling Campaign to the Silvertown Tunnel Consultation, November 2015

The London Cycling Campaign is a charity with more than 40,000 supporters of whom 12,000 are full members. We speak up on behalf of everyone who cycles, or wants to cycle, in Greater London. Our aim is for London to be a world class cycling city. Founded in 1978, our organisation campaigns for every street in the city to be cycle friendly so millions more Londoners, whatever their age or ability, can enjoy the benefits of cycling, helping to create a cleaner, healthier and less congested capital.
We welcome the opportunity to comment on the Silvertown tunnel consultation. LCC has submitted responses to previous consultations on river crossings. This response reflects some of the views expressed in the previous responses while providing additional comments. The response also draws on the views of LCC's local groups in the area covered by the project.

Executive summary

The London Cycling Campaign supports the provision of additional crossings of the River Thames, which represents a significant barrier to local accessibility for the communities on either side, by sustainable modes of transport.

We do not support the construction of the Silvertown tunnel, costing £920 million, an increase of 50% on original estimates, because of its negative impacts on road congestion, air quality, noise pollution and road collisions.

A doubling of road capacity, a prime purpose of the tunnel according to TfL[1], induces additional traffic as stated repeatedly in the TfL documentation for the tunnel.

We do not wish to see increased congestion on roads on either side of the river due to through private motor traffic induced by an additional motor vehicle tunnel. Such additional traffic can be a deterrent to increased cycle use, a source of pollution and can make local motor journeys longer due to the congestion caused. Increases in motor traffic can also lead to more road collisions.

The Silvertown project is expected provide journey time benefits, in the short term, for the 68% of current Blackwall tunnel users who are car owners, while imposing negative outcomes in terms of air quality and increased noise and motor traffic on the residents of some of London's poorest districts where the majority of residents are not themselves car owners.

[1] TfL letter to Greenwich residents April 2015

Given the declared need to re-coup the cost of the project through tolling, TfL and its PPP (private public partnership) partners will have a clear incentive to make use of the doubled capacity of the Blackwall-Silvertown tunnels to grow traffic volumes through the tunnels which in turn will have an adverse impact on London's population across East London. We note the consequent opposition to the tunnel from both Hackney and Lewisham councils.

We believe that new crossings (including bridges, tunnels and ferries) that serve sustainable transport modes can produce economic, social and environmental benefits in the context of the identified need to develop sustainable communities in the Thames Estuary. Users of sustainable transport modes, notably walkers and cyclists, are often local people making local journeys rather than travellers through an area to reach a further destination.

Improving river crossings for pedestrians, cyclists and public transport and increasing their number east of Tower Bridge must be a key element of reducing car dependency and would be a better use of investment funds than the Silvertown tunnel.

Introduction

The London Cycling Campaign supports the provision of additional crossings of the River Thames, which represents a significant barrier to local accessibility for the communities on either side, by sustainable modes of transport.

We do not support the construction of the Silvertown tunnel, costing £920 million, an increase of 50% on original estimates, because of its negative impacts on road congestion, air quality, noise pollution and road collisions. Increased road capacity, a prime purpose of the tunnel according to TfL[2], induces additional traffic as stated repeatedly in the TfL documentation for the tunnel.

"It has been well documented in recent years that the provision of additional highway capacity to address congestion in urban areas can prove to be of short-lived benefit. This reflects an effect known as 'induced traffic' in which the increased convenience of driving (owing to reduced journey times, for example) attracts additional traffic to the point where queues initially relieved return to their former levels. At this point, congestion on the road network in the vicinity of the crossings would increase, offsetting the benefits (in terms of congestion relief and improved resilience) of the Scheme."[3]

Given the declared need to re-coup the cost of the project through tolling, TfL and its PPP (private public partnership) partners will have a clear incentive to make use of the doubled capacity of the Blackwall-Silvertown to grow traffic volumes through the tunnels which in turn will have an adverse impact on London's population across East London.

New crossings (including bridges, tunnels and ferries) that serve sustainable transport modes can produce economic, social and environmental benefits in the context of the identified need to develop sustainable communities in the Thames Estuary. Users of sustainable transport modes, notably walkers and cyclists, are often local people making local journeys rather than travellers through an area to reach a further destination.

We do not wish to see increased congestion on roads on either side of the river due to through private motor traffic induced by an additional motor vehicle tunnel. Such additional

[2] TfL letter to Greenwich residents April 2015
[3] TfL 2015 Preliminary case p. 111 4.2.2

traffic can be a deterrent to increased cycle use, a source of pollution and can make local motor journeys longer due to the congestion caused. Increases in motor traffic can also lead to more road collisions.

We note that Mayoral policy, as described in the London Plan, is to increase cycle use to 1.5 million journeys per day (an approximately 5% modal share) by 2026 and to reduce motor car use and car dependency. The Mayor is also committed to improving the poor air quality in the capital and reducing health inequalities. The construction of new roads and tunnels in the capital that will likely encourage the growth of through traffic conflicts with these policies. To meet stated policies there must be a de-prioritisation of motorised long-distance movement in any new East London river crossing. Both the National Networks National Policy Statement (NNNPS) and the London Plan are cited by TfL in the Preliminary case:

*(*7.2.27*) "The NNNPS requires that applicants show that they have considered opportunities to deliver environmental and social benefits (NNNPS 3.3) and to improve quality of life (NNNPS 3.2). Similarly, London Plan policy 6.12 requires proposals that would increase road capacity to show how a net benefit to London's environment can be provided and how conditions for pedestrians, cyclists, public transport users, freight and local residents can be improved. A net benefit should be shown across these areas."*[4]

As we explain below, there will be a net dis-benefit for all road users from a significant increase in motor vehicle journeys. TfL states that the Silvertown tunnel will double capacity[5] at this location. If that extra capacity is fully used the negative impacts in most of the London Plan categories listed above will be substantial.

In a presentation to the London Assembly, Transport for London suggested that the proposed increase in private motor vehicle capacity effectively redresses the balance after the construction of public transport river crossings. This omits the evident point that better public transport helps to cut demand for car journeys, and thus addresses the Mayor's declared intention of reducing car dependency as stated in his transport strategy:

"(*1.11.) Overall, the implementation of the (Mayor's Transport) strategy would see the existing increase in public transport usage continue, together with an increase in cycling, and a corresponding decrease in car use*."[6]

Improving river crossings for pedestrians, cyclists and public transport and increasing their number east of Tower Bridge must be a key element of reducing car dependency.

Omissions in the TfL Preliminary case

a. Combined impacts of alternative options

TfL seeks to dismiss all alternative options (Preliminary case Appendix A) to the Silvertown tunnel by arguing that they would not 'of themselves' resolve the problems that TfL identifies at the Blackwall tunnel.

What TfL has not done is analyse, and quantify, the option of implementing a range of 'alternative options' simultaneously to reduce demand at the Blackwall tunnel and increase the use of public transport, walking and cycling. As we note below, the selected TfL options do not include widened catchment areas for public transport (through the provision of cycling hubs at stations or improved bus connections) nor do they properly consider, and quantify, the impacts of behaviour change programmes to encourage public transport use.

[4] TfL Preliminary case p. 158
[5] TfL Preliminary case p. 154
[6] TfL East London river crossings – assessment of need 1.11

b. Comprehensive traffic growth forecasts based on population growth, induced demand, new developments and recovery of £ 920m of construction costs

The TfL documents do not fully spell out how much of an increase in motor traffic TfL actually anticipates given the various demand factors. Thus how much relates to population growth and new developments how much is needed to meet cost recovery targets and how much will be induced by the creation of a new tunnel. An indication of Blackwall Tunnel demand is provided in the Preliminary Transport Assessment (p.17) in its estimate of current demand rising from 104% to 142%:

"At the Blackwall Tunnel, demand relative to capacity will increase significantly at peak times, and in particular in the southbound direction of the PM peak where demand relative to actual flow is forecast to increase from 104% in 2012 to 142% in the Reference Case."

It remains unclear what factors are included in this assessment and TfL does not clarify how much of this and, other demand, it will seek to satisfy or discourage through charging.

Air Quality

The damage of poor air quality to people's health is well established. King's College now estimates that the 'mortality burden' of poor air quality equates to 9,416 deaths each year in London.[7] Motor traffic exhausts account for a significant part of air pollution in London. Increased traffic volumes will increase the danger from poor air quality

The following quotation is from the TfL Preliminary case p. 179:
"7.4.19 The NNNPS at 5.13 requires the Secretary of State to refuse consent for schemes which after taking into account mitigation will:
• result in a zone/agglomeration which is currently reported as being compliant with the Air Quality Directive becoming noncompliant; or
• affect the ability of a non-compliant area to achieve compliance within the most recent timescales reported to the European Commission at the time of the decision"[8].

TfL's hope appears to be that negative consequences of the scheme will be outweighed by gains due to the faster traffic flow:

"*The implementation of the Scheme is predicted to result in both improvements and deterioration in air quality at worst case receptors. In general there is a net benefit as there are more receptors where concentrations of NO2, PM10 and PM2.5 are predicted to decrease than receptors where concentrations are predicted to increase."*[9]

Yet, despite the above statement in one part of its documentation, TfL's business case for the crossing says clearly that there will be a negative impact on air quality:

"Environment – there is slight <u>adverse</u> impact on air quality (-0.27m) and noise (-£2.7m)."[10]

What TfL does not appear to analyse are the consequences for air quality and greenhouse gases if the full (double) capacity of the proposed tunnel is utilised, responding, for example, to growing volumes of induced motor traffic. A doubling of motor traffic volumes, or indeed any significant increase, would lead to greater congestion, and consequent air and noise

[7] King's College 2015 Understanding the impacts of air pollution in London p.8
[8] TfL 2015 Preliminary case p. 179 7.4.19
[9] TfL 2015 Preliminary case p. 178 7.4.16
[10] Preliminary Business case p 123 3.11.1

pollution, at locations beyond the tunnels affecting people in residential areas as well as children in schools.

Lewisham Council which opposes the tunnel specifies that it "risks exacerbating rather than dispersing" traffic congestion and also risks "a deterioration of air quality in the London Borough of Lewisham[11]."

Pedestrian and Cycle Crossings

Our support for such crossings is based on the premise that pedestrian and cycle bridges, or tunnels, along with ferries, serve local needs and prioritise local trips, facilitating catchment-based local movement by public transport, walking and cycling. Increased cycling and walking levels brings health benefits to the individuals involved and reduces harm to the environment.

We note, at the outset, that the presentation of the Emirates cable car by TfL[12] as a convenient or realistic regular crossing for cycle users, rather than a leisure or tourist ride, is not justified. The cost of fares (£9 return or £3.30 each way using an Oyster card) makes it prohibitive for commuters and the service is not available after 9pm and sometimes closed because of high winds. Its location is not along a popular desire line for cycle users and Silvertown Way, the major connection at the north end cable car terminal, is a seriously hazardous road for cyclists despite being identified on the TfL London Cycling Guides as a designated bike route.[13]

Cyclists are currently poorly served by crossings east of Tower Bridge:

- The Hilton – Canary Wharf Ferry is limited in size, and very expensive.
- The Rotherhithe tunnel has what TfL describes as an inhospitable environment and attracts very few riders.[14]
- The Greenwich tunnel (used by several hundred cyclists each day) has to be walked through and can be busy with pedestrians.
- Fares on the Emirates cable car crossing, as noted above, are expensive and not on a commuter desire line.
- The Woolwich tunnel and ferry both link to roads that are inhospitable to cyclists and cycling is not currently permitted in the tunnel
- The DLR, which carries cycles at limited off-peak times, does not do so at peak times

The Silvertown Tunnel proposal does not address this lack of provision for sustainable modes. Indeed the tunnel will be for motor vehicles only.

Several convenient crossings, whether tunnels, ferries or bridges, for cyclists/walkers have been proposed and, in one case, fully-costed:

- Dome to Blackwall: It is worth noting that the Blackwall Tunnels have no cycling equivalent taking people from the Greenwich peninsula to Blackwall where cycle routes to the City and West End commence.

[11] Lewisham Council motion 25 November 2015 Motion 1
[12] Transport Committee oral evidence: Strategic river crossings HC714
[13] We note that Silvertown Way has substandard cycle lanes (below 1.1 metres) and sees vehicle speeds in excess of 50 mph. It is often used as a three lane road.
[14] TfL East London river crossings 8.36. "Cyclists can use the tunnel, and are technically required to ride in the carriageway. However numbers are very low due to the inhospitable environment"

- A pedestrian and cycle crossing, such as a ferry, of the River Roding south of the A13 to connect up the planned developments and cycle routes in the Riverside Opportunity Areas.

- Crossings for sustainable transport modes east of Woolwich and west of Dartford Bridge linking Bexley with Barking and Dagenham

- Rotherhithe to Canary Wharf (Durand's Wharf to Westferry Road): Sustrans is now undertaking a feasibility study of such a bridge but there is no commitment to take the project any further, nor are any funds assigned to it. Despite an earlier costed proposal from Sustrans[15] TfL is not promoting the Rotherhithe bridge in conjunction with its promotion of the Silvertown tunnel but only making reference to a study.

The engineering expertise that would have been used to design the Silvertown tunnel could be utilised to realise one or more world class crossings that cater for sustainable transport modes.

We note that demand for higher grade cycle facilities is high as evidenced by the very high, and growing, cycling numbers at existing purpose built crossings and links: the crossing of City Road in Islington attracts more than 1,400 cyclists per hour at peak times; the cycle crossing at Hyde Park Corner attracts similar numbers; the Greenwich foot tunnel, despite its very significant limitations, attracts 2000 cycle users per day. Just as new roads attract more vehicles so new or improved crossings for cycle users and walkers generate more walking and cycling.

As a footnote to our comments on pedestrian and cycling bridges we note that a developer who has examined the documentation for the North Greenwich peninsula has concluded that the proposed cycling and walking infrastructure does not meet London Cycle Design Standards. On example is the proposal of shared use paths below recommended widths. Regardless of the merits of the Silvertown scheme TfL must remain committed to meeting its own London Cycle Design Standards and not diluting them, whether through oversight or deliberate intention, in any of its proposed projects.

The benefits of local crossings

As noted above LCC favours local crossings such as bridges or ferries for sustainable transport modes, while opposing a tunnel, or bridge, that generates high volumes of through motor traffic. The key benefits of local crossings include:

1. Local crossings break down the barrier to local movement provided by the river and help to knit together communities. Accessibility rather than mobility is required for the economy (particularly the local economy) to function efficiently.

2. Local crossings are an essential part of well-designed integrated communities. The crossings, if provided at sufficiently frequent intervals, define principal local networks and emphasise locality and community as key elements of sustainable development.

3. Local crossings promote local transport over longer-distance traffic. A further motor vehicle tunnel, or bridge, on the other hand, will only result in vastly increased levels of through traffic.

[15] http://www.sustrans.org.uk/assets/files/olympics/Sustrans_ThamesBridge_Demand_Forecast.pdf.

We note that by providing free local crossings for pedestrians and cycle users these modes are encouraged. Where there is a fee involved, this should only form part of the cost of a longer journey, such as that by rail or underground. Point to point crossings of the river should be free to local users. We note that there are no tolls on motor vehicle crossings through the Blackwall and Rotherhithe Tunnels whereas the parallel Hilton to Canary Wharf ferry carries a significant fee as does the Emirates Cable Car (fees in excess of those on the Dartford crossing).

Improving public transport links

Where public transport links across the Thames have improved, for example the Jubilee Line and the DLR, they have been filled by new customers. TfL estimates that with the addition of Crossrail public transport capacity crossing the Thames over the past ten years will have grown from 7,000 passengers per hour to 70,000.

Given such demand it is surprising that TfL identifies only one further public transport improvement that, in its opinion, has the potential to reduce demand for driving through the Blackwall tunnel. Notably, TfL does not consider the potential impacts of a combination of all the public transport schemes that both TfL itself and boroughs have identified:

"*We examined a range of options for new public transport crossings, and identified an extension of the DLR to Eltham as the only public transport scheme which in principle had the potential to lead to a significant shift away from the car to public transport. When investigated we determined that this would not do enough to address congestion and resilience issues at the Blackwall Tunnel. Our analysis indicated only 4 per cent of existing tunnel users would be within its catchment (and of these even fewer would be capable of taking advantage of the new connection it offered). It also would not provide a solution to the issue of limited road river-crossing options when Blackwall Tunnel is closed."*[16]

While this statement does not elaborate how the catchment area was measured TfL's analysis does not appear to consider that using integrated transport – such as a combination of cycle and rail or bus and rail - can significantly enlarge catchment areas. Cycling enlarges a walking catchment area for a station fourfold. Where station cycle parking facilities are improved and increased (for example Sutton, Richmond, Waterloo, Paddington) they are rapidly taken up by cycle-rail commuters.

The dismissal by TfL of the only public transport scheme it considered worthy of inclusion in its 'alternative options' conflicts directly with the consultation recommendations of the relevant boroughs: Greenwich for example rejects support for the Silvertown tunnel unless it is combined with other programmes and it identifies:

- extending the DLR to Kidbrooke and Eltham (a proposal that TfL accepts may lead drivers to switch modes)
- extending the Overground to Barkingside, Thamesmead and Abbey Wood
- extending the DLR to Thamesmead and Abbey Wood[17]

As the origin-destination survey for the Blackwall, conducted for TfL[18], shows, a third of south to north users of the Blackwall tunnel start their journeys locally (Greenwich, Lewisham, Bexley) and a third end their journeys in Tower Hamlets (primarily Canary Wharf

[16] TfL Alternative options p 2
[17] TfL Analysis report 2015 11.2.10 Greenwich
[18] TfL origin destination study report 2008

and the Isle of Dogs). Many of these, often relatively short, journeys could be made by public transport, cycling or walking if improved links for these travel modes were provided.

TfL states that 45% of journeys through the tunnel are commuter trips. Many such journeys have the potential to change mode to public transport or integrated transport trips, if suitable conditions were provided, thereby reducing demand for tunnel crossings. This would help sustain the welcome trend in London:

"*Over the ten-year period from 2001, total trips have increased by 11.3 per cent, with particularly notable increases of 41.9 per cent in rail trips, 59.7 per cent in bus trips, and a 66.6 per cent increase in cycle trips (as main mode). Car driver trips decreased by 13 per cent over the same period."*[19]

It is notable that the survey cited by TfL[20], in its documents promoting the need for additional road capacity, says that 52% of local residents sometimes used public transport to cross the river to avoid driving. The other side of this survey result is that some local, and non-local, people may be incentivised to drive, instead of taking public transport, if greater road capacity was provided and if journey times were faster, in the short term, as is planned at Silvertown. The net result will likely be that a modal switch from public transport would increase congestion and any short term gains in journey times would be lost.

Managing demand for the Blackwall tunnel

In its consultation documents TfL accepts that charging for the Blackwall tunnel crossing (prior to the construction of Silvertown) would reduce demand[21]. It does not, however, provide any estimate of what this reduction might be. At a meeting with the London Assembly Transport for London were unable to answer questions from Assembly Members[22] about the potential impacts of a toll on the Blackwall Tunnels.

TfL states that motor traffic levels will increase if a Silvertown tunnel is built unless there are demand management measures in place. Indeed, the TfL proposal recommends tolls on both Blackwall tunnels and the Silvertown tunnel to manage such demand. The public/private funding of the project however means that TfL and its partners will likely need to generate increased overall demand for all three tunnels to re-coup costs. This appears to be reflected in the forecast traffic volumes.

Limited TfL forecast data[23] indicates that even with its suggested charging regime it anticipates traffic growth of around 10% by 2021, well before the London population hits 10m. The 'enhanced capacity' of the three tunnels (two Blackwall plus Silvertown) will, according to TfL in fact be 1700 cars each way per hour plus the equivalent in HGV/bus capacity in the other tunnel lane (850 vehicles (counting an HGV or bus as 2 passenger car units). This is effectively, as TfL states, a 'doubling' of the crossing capacity.

"It would potentially double capacity for crossing the river at Blackwall/ Silvertown and provide full-height clearance enabling HGVs up to 5m in height (and double deck buses) to cross the Thames at this location."[24]

[19] TfL Travel in London Report number 5 [19](Transport for London - 2012
[20] TfL Preliminary case p.51
[21] TfL Alternative Options p.4
[22] London Assembly seminar on River Crossings Jan 9th 2013
[23] TfL Letter to Greenwich resident April 2015
[24] TfL Preliminary case p.154

What TfL has not established is whether introducing a toll on the Blackwall tunnels, at the present time, would lead to a reduction in traffic volumes sufficient to eliminate tailbacks. Given the success of the congestion charge in reducing motor traffic volumes in central London, and boosting bus travel and cycling, it is surprising that demand management is not being considered as a first step to handle tail backs at Blackwall or indeed as a way to judge the actual demand for any new tolled crossing. Coupled with other measures such as improvements in public transport, better provision for walking and cycling and wider use of road pricing, conditions could be created to further reduce private motor vehicle use and eliminate the need for, and cost of, river crossings such as the Silvertown tunnel.

We note that in Australia some private toll tunnel projects have gone into receivership because the projected demand for usage was over-optimistic.

If demand at Silvertown were to be lower than expectations TfL, in partnership with the tunnels' financial backers, will presumably seek to boost traffic to recover the costs of construction by promoting car use through the tunnels and therefore in East London as a whole.

Generating traffic

While the TfL case for the Thames Gateway Bridge attempted to argue that there were benefits for cycle users no such case is being made for the Silvertown tunnel. The tunnel would be for motor vehicles only and, according to evidence provided to the London Assembly by the RAC[25], it would not assist with local regeneration but only provide additional capacity for cross river journeys. As can be seen in other parts of London higher traffic volumes can blight an area instead of regenerating it.

TfL, in its evidence to the London Assembly River Crossings seminar,[26] accepted that that the proposed new tunnel would generate additional motor traffic. The link between road building and traffic is clearly recognised by TfL:

"*It has been well documented in recent years that the provision of additional highway capacity to address congestion in urban areas can prove to be of short-lived benefit. This reflects an effect known as 'induced traffic' in which the increased convenience of driving attracts additional traffic to the point where queues initially relieved return to their former levels. At this point, congestion on the road network in the vicinity of the crossings would increase, offsetting the benefits (in terms of congestion relief and improved resilience) of the Scheme[27]"*

This conclusion re-iterates the findings of the SACTRA report in 1994[28] which found that 'induced traffic' was estimated at 10% of base traffic in the short term and 20% in the long term.

TfL acknowledges that, without user charging, a third tunnel at Blackwall will lead to increased motor traffic volumes[29].

"If we didn't introduce a charge then the additional capacity provided by the new tunnel would attract new traffic and rapidly exceed the capacity of the surrounding network, and

[25] River Crossings Seminar 2013
[26] ibid
[27] TfL Preliminary case p. 111
[28] Trunk roads and the generation of traffic SACTRA 1994
[29] TfL Preliminary case p 154 7.2.11

leading(sic) to similar congestion, delay and unreliability problems as the current Blackwall Tunnel."[30]

TfL does not state whether it will raise tolls on all tunnels to a level that will prevent growth in volumes as developments on both sides of the river come on stream. Given that most respondents to the TfL consultation (57%)[31] object to user charging this may be a significant political hurdle.

TfL is currently proposing charges similar to those for the Dartford Crossing (£3 for a car) with limited discounts:

"Introducing extensive further discounts, or those which might apply to large numbers of people such as a residents discount, could increase demand to use the tunnels, potentially to a level beyond the capacity of the local road network."[32]

If any additional traffic is generated by the new tunnel this will have an adverse impact on local roads notably those in Newham, Hackney and Greenwich. The A12 already sees tailbacks on a regular basis and residential streets in its vicinity are blighted by rat running. It is not surprising that the London Boroughs of Hackney and Lewisham have stated their opposition to the tunnel project because of its likely negative impact on local roads.

As TfL also acknowledges "*A charge at the Blackwall Tunnel (*which is not currently charged*) could reduce some of the demand – depending on the level at which it was set.*"[33] Thus demand could be reduced even if an additional tunnel is not built. Introducing a charge before building a new tunnel would determine by what amount demand could be reduced and what impact there would be on other crossings.

We know from the experience of the congestion charge that car volumes fell by a third in the charging zone when the charge was introduced, before building up again over several years. Where space gained was reallocated however, to buses and pedestrians for example, there has been an overall gain in the movement of people because of greater bus passenger numbers and consequently reduced demand for car transport. TfL's Travel in London Report 7 notes that motor car use fell by 11.1% from 2000 to 2014. By contrast cycling, to which small amounts of space have been allocated in a few London locations, has increased by 60% in the capital and, like buses, delivers more productive use of road space than single occupancy cars.

Investment in a new traffic generating project, without properly considering the potential for motor traffic reduction and an increase in sustainable transport journeys, is thus short-sighted and potentially damaging to the future of London as a liveable city.

Balance

At public meetings, and in Parliament[34], a major argument from TfL for the Silvertown tunnel has been that it will redress the balance from provision of improved public transport links across the river, to increasing road capacity. At such meetings, as well as in the consultation documents, TfL presents the construction of the DLR and Overground connections across the river and the Emirates Airline cable car as sufficient contributions (presumably to meet

[30] TfL Alternative options p. 5
[31] TfL Analysis report 2015 p. 5
[32] TfL Have Your Say p. 22
[33] TfL Alternative options p. 4
[34] Transport Committee oral evidence: Strategic river crossings HC714

sustainability targets), which, it argues, must now be balanced by an increase in road capacity.

We reject this un-sustainable argument which presents a 'balance' in construction programmes as a worthwhile cause. The Mayor's declared intention, reflected in the London Plan, is to reduce dependency on the car, for the better health and convenience of Londoners, rather than promote all transport modes equally.

Aiming to reduce motor traffic across the capital serves all road users by cutting pollution and overall congestion as opposed to re-locating congestion and intensifying pollution through increased road building.

Lack of equity

The TfL case for the Silvertown tunnel shows that the prime journey time beneficiaries of Silvertown, in the short term (in the longer term induced traffic will erode those gains), will be the private car owners who already account for some 70% of Blackwall tunnel users. Reducing journey times, over the short term, by doubling tunnel capacity will incentivise yet more car owners to commute to Canary Wharf and the surrounding zone (where a large proportion of trips terminate). Indeed it may encourage more affluent households to buy cars for the purpose of commuting. This would potentially undo the welcome trend for a gradual decrease in London-wide car ownership as reported by the Roads Task Force.

While TfL attempts to portray the Silvertown tunnel as an improvement for everyone, the disproportionate accrual of short term time journey benefits for car owners will in fact result in the project's primary, short term, gains being for those on higher incomes and its long term dis-benefits, in terms of lower air quality and greater traffic congestion, hitting more people on lower incomes.

The Roads Task Force report on car ownership notes that London car owners, are disproportionally more affluent, white and middle aged. Thus among households with an income above £75,000 more than 80% own a car whereas among those earning under £25,000 fewer than 50% percent own a car. People from ethnic minorities are less likely to own a car as are people under 30 or over 60. The ownership of cars, and therefore access to shorter journey times, is not evenly distributed in London. In the boroughs of Hackney and Tower Hamlets, which are likely to suffer the most from reduced air quality and increased motor traffic volumes as a result of Silvertown tunnel, household car ownership is 35% and 33% respectively - far lower than the London average of 54%.

Conclusion

We strongly support the idea that local solutions should be found to crossing the river which are consistent with the need to build sustainable and inclusive communities and cater for local transportmovements including cyclists. We would like to see well designed and convenient new crossings for walkers, cyclists and public transport in East London that serve to increase walking and cycle use, together with an improvement in existing crossings such as the Greenwich and Woolwich foot tunnels.

London Cycling Campaign objects to the proposed Silvertown tunnel because it is the wrong solution for East London in the context of the London Plan and its principles of sustainability. A third motor tunnel will only serve to generate more motor traffic journeys and blight the communities on both sides of the Thames.