Response from the London Cycling Campaign to the Silvertown Tunnel Consultation, December 2014

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 the 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 previously submitted responses to two consultations on river crossings. This response reflects some of the views expressed in the previous responses while addressing additional data provided by TfL.

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.

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 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.

We note that Mayoral policy, as described in the London Plan, is to increase cycle use (to at least a 5% modal share by 2026) and to reduce motor car use and car dependency. The Mayor is also committed to improving 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.

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 strategy would see the existing increase in public transport usage continue, together with an increase in cycling, and a corresponding decrease in car use[1]."

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.

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 as a convenient or realistic regular crossing for cycle users, rather than a leisure or tourist ride, is not justified. The cost of fares (£3.30 each way using an Oyster card) makes it prohibitive for commuters and the service is not available after 9pm. 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 (which was misleadingly highlighted as a leisure route to the Olympic Park).[2]

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

- The Hilton Ferry is limited in size, and very expensive.
- The Rotherhithe tunnel has what TfL describes as an inhospitable environment and attracts very few riders.[3]
- 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 the 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.

- 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

[1] TfL East London river crossings – assessment of need 1.11
[2] 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.
[3] 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"

- Rotherhithe to Canary Wharf (Durand's Wharf to Westferry Road): We note that the fully-costed Sustrans-proposed cycling and walking bridge at Durand's Wharf – Westferry Road is not considered in the consultation. A full assessment of the project, offering much greater detail than the River Crossings consultation proposals , can be found at this web location: http://www.sustrans.org.uk/assets/files/olympics/Sustrans_ThamesBridge_Demand_Forecast.pdf.

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.

Demand for Greater Motor Traffic Capacity

We note that Transport for London were unable to answer questions from London Assembly members[4] 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.

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.

The Proposed Silvertown Tunnel

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[5], it would not assist with local regeneration but only provide additional capacity for cross river journeys. TfL argues that the tunnel 'would help to regenerate the area' in its consultation document but does not provide evidence to substantiate this. 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,[6] accepted that that the proposed new tunnel would generate additional motor traffic. As noted above, TfL argued that road pricing would be required to limit such growth.

TfL's anticipation of additional motor traffic generated by the tunnel is well founded. The SACTRA report in 1994[7] found that additional road building to increase motor traffic capacity is followed by additional motor traffic on those roads (induced traffic) which in turn leads to more congestion on those and other roads. Induced traffic was estimated at 10% of base traffic in the short term and 20% in the long term.

In the case of the proposed tunnel additional traffic would use roads both north and south of the tunnel, many of which are already suffering from congestion. Such new journeys, or ones diverted

[4] London Assembly seminar on River Crossings Jan 9th 2013
[5] ibid
[6] ibid
[7] Trunk roads and the generation of traffic SACTRA 1994

from other transport modes, will have a detrimental effect on carbon dioxide emissions, air quality and noise levels.

The inspector in the Thames Gateway Bridge public inquiry stated:

"Private cars account for about 10% of UK carbon dioxide emissions. (9.379)
…TfL's evidence is that the scheme would result in the emission of an additional 55,000 tonnes of carbon dioxide in 2016. (9.380)…
It seems to me that even a small increase offers no assistance in achieving a reduction to which the Government has made a commitment. (9.382[8])"

Research for the GLA indicates that air pollution contributes to more than 4,267 premature deaths in London per year. According to King's College[9] 'Provisional results for 2011 indicate that the annual mean National Air Quality Strategy Objective (which mirrors the EU Limit Values) for NO2 was breached at the majority of locations close to roads and at five locations away from busy roads.'

The local blight created by large motor vehicle junctions such as Elephant and Castle, Bow roundabout and Swiss Cottage is evident at these and other locations. In addition to the impacts on air quality and carbon emissions there are high local noise levels and an increased number of collisions. Cyclists are only too aware of the hazards and poor road conditions for cycle users in the vicinity of roads such as the A12 following several recent fatalities.

Proposals for an additional tunnel under the Thames fail to take account of the reduction in private motor vehicle volumes in London that have taken place over the past decade, and which can continue if policies to promote sustainable transport and reduce car dependency are followed. The TfL Travel in London Report number 5 [10](Transport for London - 2012) notes that

'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.'

We note that the latest TfL documentation for the Silvertown tunnel proposal includes a map of the origins and destinations of vehicles crossing through the Blackwall tunnels. Almost seventy percent of tunnel journeys are by private car (several times higher than commuter car journeys in central London). The map indicates that a large proportion of morning commuter journeys through the tunnels originate in Lewisham and Greenwich and finish at Canary Wharf or at car parks/parking spaces on the Isle of Dogs that service Canary Wharf. These distances are well within the reach of cycle transport or a combination of cycle and rail/underground .

Improving the quality of cycle routes to Canary Wharf and the addition of a cycle and pedestrian bridge from Rotherhithe to Canary Wharf would attract many more people to commute on foot or by bicycle while costing significantly less than a third motor tunnel. Given that up to a third of morning commuter traffic through the tunnel appears to end up in Canary Wharf, providing improved cycling and cycle/rail routes could lead to significant modal shift from car to other modes of transport.

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.

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:

[8] Thames Gateway bridge public inquiry 2007
[9] Air Quality in London – briefing note to GLA Environment and Health Committee, King's College 2012
[10] Travel in London Report 5 , TfL 2012

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.

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) .

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 traffic movements 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 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 fourth motor tunnel will only serve to generate more motor traffic journeys and blight the communities on both sides of the Thames.