



Your voice for a cycling city

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London Cycling Campaign response to Silvertown and Blackwall tunnels user charge consultation

<https://haveyoursay.tfl.gov.uk/tc-yourview>

About LCC

London Cycling Campaign (LCC) is a charity with more than 20,000 supporters, of whom more than 12,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

Response

Silvertown Tunnel, in general

We have repeatedly opposed the construction of the Silvertown Tunnel and purposing it as currently proposed. It is realistically, based on all available evidence and past examples, very likely that opening this tunnel to private motor traffic will result in more private motor traffic in east London overall.

On that basis, we would still suggest that Silvertown Tunnel should ideally be used solely for public transport (one bore) and active travel (second bore).

Tolling tunnels

Given it's likely Silvertown Tunnel will open for private motor traffic next year, the key then has to be for TfL and the Mayor to ensure overall private motor traffic levels in east London do not rise.

TfL's consultation states "the new tunnel will help reduce congestion and deliver faster, more reliable journeys in east London, making travel times up to 20 minutes quicker". This sentence ignores the phenomenon of 'induced demand' to a worrying extent and indicates that TfL has failed to accurately assess best practice, evidence and indeed its own policies in embarking on this project and consultation. Opening a new tunnel and making private motor vehicle journeys in the short term "up to 20 minutes quicker" *will* inevitably induce further motor vehicle demand – more people will drive because of the tunnel

making journeys more available via motor vehicle, and because motor vehicle journey times have dropped.

In the medium term, based on all case studies available, this will likely result in journey times returning to where they were before approximately, but now with many more motor vehicles on the road due to the additional capacity the tunnel affords.

This is almost bound to happen *despite* tolls. So it's vital TfL sets tolls, and adjusts them if needed, to be high enough to restrain demand effectively to retain any likelihood of achieving the Mayor's Transport Strategy etc.

Tolling pricing & exemptions

The extensive list of exemptions as well as the relatively low cost of the toll (compared to the running costs of motor vehicles) will likely result in motor traffic levels across the area and around both ends of the tunnel rising steeply and more people overall making more journeys in private motor vehicles.

TfL should work to therefore increase the charges for Dartford and Blackwall and proposed for Silvertown and monitor other river crossings too for evidence of increased usage. Further, TfL should be prepared to introduce tolling on crossings (Rotherhithe Tunnel and Tower Bridge being obviously likely locations) where those seeking to avoid any tolls divert to, in order to restrain demand locally at individual crossings *and* overall demand.

Additional river crossings in East London

The Mayor and TfL, facing crises of climate, inactivity, congestion, pollution, road danger and community and opportunity severance, have repeatedly failed to introduce high-quality walking, cycling and public transport crossings across the Thames elsewhere despite assurances they want to.

The Silvertown Tunnel was approved at the same time as another river crossing proposed nearby for active travel was cancelled on grounds of cost.

We now also face the very real and current issue of ageing river crossings at risk of closure. Hammersmith Bridge is the most obvious example of near catastrophic failure due to the weight of motor traffic it carried and its age and upkeep – but it is not alone, with Rotherhithe Tunnel and Tower Bridge again both currently obviously showing their age.



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TfL should be actively working to enable people, freight, public transport, active travel and necessary private motor traffic to cross the Thames in a manner to enable London to keep moving and also to enable the Mayor's Transport Strategy and Net Zero targets to be achieved realistically.

Despite words of assurance at the end of the consultation that the Silvertown Tunnel is "part of the longer-term plan in east London to improve river crossings", there is little to show for that plan so far, and it appears to be active travel that always loses out.

The Mayor and TfL then should not only be considering pre-emptively closing some crossings near the Silvertown Tunnel (such as Tower Bridge and Rotherhithe Tunnel) to all but pedestrians, those cycling and possibly public transport, but also considering what modes of transport and for what purposes best go where, and therefore what river crossings are needed, where.

Cycling shuttle bus & free DLR

Given what amenities and opportunities are on both sides of the Thames here, it is vital sufficient provision is made via any cycle shuttle bus for cargo cycles with freight boxes on as well as for inclusive cycle provision such as handcycles and trikes.

We do not believe however that a shuttle bus, even if free for the first year, which you have to wait for and load cycles on and off of, is an adequate and convenient enough alternative to proper provision for cycling across the Thames in this area. We believe it is likely the service will be relatively lightly used – this should not however become a rationale to remove the service, but to deliver other, better river crossings for active travel.

We also welcome free cycle carriage on DLR around the area. And we welcome the public transport provision generally proposed through the tunnel.

Lorries

Despite the concessions made for active travel, and the enhanced bus route provision through the tunnel, the huge cost of the tunnel and the materials TfL has provided, make it a common assessment among many that the Silvertown Tunnel is more about lorry movements across the Thames than buses or people.

The potential for large quantities of construction and freight motor vehicles to use Silvertown appears to be a core reason for its



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construction, yet far too little work has been done to ensure the tunnel opening doesn't increase road danger issues in already dangerous parts of east London for active travel – with the largest vehicles on the road being the most dangerous in general.

If lorries are to be a significant proportion of overall motor traffic movements here, our final point would be that TfL and the local councils at each end of the tunnel should be doing far more to separate flows of those cycling and corridors where there is potential for more cycling, with the largest and some of the most dangerous motor vehicles on London's roads.

TfL should urgently bring forward plans on both sides of the river to enable key cycling corridors with fully protected cycle tracks and/or using Low Traffic Neighbourhoods (LTNs) to keep those cycling away from increased traffic of larger and more dangerous motor vehicles.