

This response to the Silvertown Tunnel bus network consultation is from **Newham Cyclists**, the local borough group of the London Cycling Campaign (LCC). We represent the interests of people in Newham who already cycle, and campaign for safer streets that would make cycling a mainstream, inclusive, and convenient mode of transport for everyone.

### **We strongly oppose the proposals.**

The Silvertown Tunnel is an urban motorway project and must not open in its proposed form as a river crossing for general traffic, particularly with such a threadbare bus network.

It should instead be re-tooled as a crossing **only** for a more substantial public transport network along with walking and cycling.

- **The proposals consist of only 2 bus routes using the Tunnel.** This suggests that the Tunnel is mainly for private motor traffic, contradictory to the Mayor's promise<sup>1</sup> in 2016 that it would be more "public transport-focused." For many, this will swing the balance in favour of driving for intra-London journeys, leading to increased road danger, congestion, and CO<sub>2</sub> emissions in Newham and for our neighbours in Waltham Forest, Greenwich, and Barking and Dagenham. Once people buy a car and begin routinely driving short journeys, that habit will be hard to break.
- **The 129 extension is welcome, although it largely appears to shadow existing DLR routes.**
- **The X239, the Tunnel's only other bus route (and the only brand new route) does not serve Newham at all.** Its purpose appears to be to shuttle commuters and shift workers from south-east London into Canary Wharf. It is unclear why this is a priority for extra bus connections, given that Canary Wharf is already served by the Jubilee line, Elizabeth line, and multiple DLR stations, all of which are step-free and operate similar hours to the proposed X239.

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<sup>1</sup> <https://www.london.gov.uk/press-releases/mayoral/mayor-commits-to-east-london-crossings>

- **The new routes using the Silvertown Tunnel will not run overnight**, meaning the only viable option for these journeys overnight (e.g. for night shift workers) will be to drive.
- **We are concerned that there are no routes using the Tunnel that serve the central or northern areas of our borough (Plaistow, Canning Town, Stratford) or some key local amenities and employment centres, such as Newham University Hospital.** For cross-river journeys to these places, the opening of the Tunnel will make driving more attractive—the opposite of a “public transport-focused” tunnel.
- **We would like to draw particular attention to Manor Road**, a north-south road on the eastern side of the River Lea. We believe that the opening of the Tunnel is likely to make driving a more attractive option for those travelling between south London and places on this corridor, potentially abstracting revenue from the Jubilee line and DLR. The Tunnel’s opening also risks Manor Road, already congested and extremely unsafe for cycling, becoming a major rat-run for drivers trying to avoid the A12. This would compromise two high-priority routes in TfL’s 2017 Strategic Cycling Analysis, and also slow down local bus journeys on routes 276 and 323 with additional traffic.
- **We are concerned that TfL is placing too much stock in tolling cross-river traffic at Blackwall and Silvertown as a traffic control measure.** We doubt they will be a sufficient deterrent for those who already own a car—particularly given that car owners are generally more affluent than most. We question whether TfL can be truly committed to reducing cross-river motor traffic when there is a financial incentive to collect tolls to pay off the Tunnel’s construction. Tolling is also likely to be an unpopular policy with drivers, and with national policy-makers who don’t use public transport. There is a major risk of tolls being abolished by a future administration (under the pretext of “reducing financial burdens” on families, businesses, etc.) thereby allowing unfettered cross-river motor traffic.
- **The currently-planned highway designs for the approaches to the Tunnel<sup>2</sup> are poor quality and do not meet current standards for walking and cycling from either DfT or TfL.** This is relevant to this consultation as it has a bearing on bus timings and routing, and also compromises the route from central London via Cycleway 3 towards City

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<sup>2</sup> <https://content.tfl.gov.uk/st-silvertown-atk-gen-drawings-revised.pdf> page 5

Hall at the Royal Docks. These designs must be revised to give priority to buses entering and leaving the Tunnel, and to include pedestrian and cycle routes that comply with LTN 1/20. These should include separated pedestrian and cycle routes (no shared footways) and safe, direct crossings of all arms of the Tidal Basin roundabout—preferably grade-separated to eliminate the need to wait for a green light at all, thereby improving bus journey times.

- **Contrary to the Mayor’s press release in October 2016 (see footnote 1) there is no mention of any trial of a cycle-bus to carry people with cycles through the Tunnel.** Such a scheme was unlikely to be successful anyway (see the failure of the Dartford Tunnel cycle bus in the 1960s,<sup>3</sup> and the replacement shuttle’s poor usage today) and it’s not clear if how it would have been inclusive of Disabled cyclists who cannot easily dismount, nor users of larger cargo cycles of the types used for group travel by families and for freight by businesses.

However, when cycle crossings east of Tower Bridge have been repeatedly delayed and cancelled, TfL not even acknowledging cycling in the consultation materials—bar a risible suggestion of the cable car, which closes at 9pm most evenings, doesn’t operate in high winds, has very long queues at weekends, and costs £5 for a single journey, as a viable alternative<sup>4</sup>—is dissonant with the Mayor’s own transport strategy and with TfL’s sustainability goals. It comes across as out-of-touch with reality for those who rely on cycling as a mode of transport rather than a leisure pursuit.

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<sup>3</sup> <https://blog.nationalarchives.gov.uk/ill-fated-cycle-bus/>

<sup>4</sup> <https://content.tfl.gov.uk/alternative-options-investigated-to-address-the-issues-at-blackwall-tunnel.pdf> “[the] cable car was introduced specifically to provide a connection for pedestrians and cyclists between the same areas that the new Silvertown Tunnel would connect... alongside our proposals for the Silvertown Tunnel scheme we will put forward measures to strengthen the role of the [cable car] as a pedestrian and cycle connection”

## CONCLUSION

- **It is impossible not to see these proposals as the resolution of a decade-long bait-and-switch.** Most Newham residents who rely on public transport will get very little from these proposals; those of us who depend on walking and cycling will get absolutely nothing, despite considerable demand for 24/7, fully-accessible river crossings.
- **Driving, however, will become more attractive**—even in a diesel or petrol-burning private motor vehicle, as these will not be banned from using the Tunnel. Even today, only 15.1% of new cars registered in the UK are electric,<sup>5</sup> and under current plans new ICE cars will only be banned from 2030 onwards. Even if all the buses using the tunnel are zero emission, most other traffic will be burning petrol or diesel for decades to come.
- In January 2022, the Deputy Mayor for Transport, when justifying the project to the London Assembly's transport committee<sup>6</sup>, invited members to “Imagine a scenario where public and active transport makes up 80% of journeys in London and all private vehicles are zero emission [...] You still wouldn't have capacity at Blackwall Tunnel alone to run the cross-transport links [required].” This is a puzzling statement given that under a year later, **TfL is proposing an extremely minimal bus network for the Tunnel, along with zero provision for active travel modes, and simultaneously planning to considerably increase cross-river capacity for private motor vehicles—the overwhelming majority of which will not be zero emission.**
- **In this context, TfL's continued promotion and marketing of the Tunnel comes across as disingenuous greenwashing of a 1960s-quality urban motorway.** It is insulting to the Newham residents who will have to deal with heavy traffic, pollution, and road danger caused by drivers of private cars using the new tunnel to avoid the A12.

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<sup>5</sup> <https://heycar.co.uk/blog/electric-cars-statistics-and-projections>

<sup>6</sup> <https://www.newcivilengineer.com/latest/londons-new-transport-chief-could-put-crossrail-2-back-on-the-agenda-18-01-2022/>

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