

This response to the Silvertown Tunnel Cross River Cycling Service consultation is from **Newham Cyclists**, the local borough group of the London Cycling Campaign (LCC). We are a grassroots volunteer group who exist to help all kinds of people access cycling as a cheap, accessible, and convenient form of transport.

The proposed cycle bus is not viable as a cycle crossing, so we can not support it.

The Silvertown Tunnel is a 1960s-quality urban motorway project that should not have been approved, and this is not an acceptable mitigation.

In light of this consultation, we have no confidence in TfL or the current Mayor ever delivering a viable cycle crossing east of Tower Bridge, despite the clear need for one.

WHY THE PROPOSED CYCLE BUS IS NOT VIABLE

A viable cycle crossing would be a crossing that allowed someone to cycle from one end to the other 24/7, on any kind of cycle, without dismounting, reversing, or lifting their machine.

The proposal is for a bus or minivan that allows people to bring certain types of cycles as luggage. It will exclude the same kinds of users as the current provision for people crossing the river with cycles. Much like the foot tunnels, cable car, and existing ferries, it will be physically inconvenient and awkward, favouring unencumbered able-bodied riders of lighter sport- and racing-type cycles, and continuing to exclude many who would benefit from utility cycling.

Boarding times are likely to be very slow, particularly if people are expected to load their cycles into racks, lash them down to prevent them falling over, or remove luggage. This, combined with waiting times (likely to be worse if

traffic is bad) will make the bus very unattractive and inconvenient with unpredictable journey times. The solution will not scale to large numbers of cyclists, making it possible that people will be left behind for the next bus. This could be mitigated using articulated vehicles, although this has safety implications—we couldn't countenance bendy buses without fully separated cycling infrastructure on the whole of their route.

It is not clear how cargo trailers or longer cargo-type cycles will fit into the bus. If cycle freight is not permitted on the bus, this means that zero-emissions cycle deliveries will be at a disadvantage to polluting vans and cars for last-mile freight.

There is an accessibility issue if someone is not able to use the bus without dismounting from, lifting, or reversing their cycle, something that is impossible on some non-standard cycles. While the visualisations show a user of an adapted cycle waiting to enter the bus, it's not clear how this would work, since such cycles typically have a turning circle and have no reverse gear—unless the bus is to be fitted with doors on both sides. It's also unclear how such cycles would be conveyed on the minivan-with-bike-trailer service.

Any bus would need to run 24/7/365 (including on Christmas Day and overnight) at turn-up-and-go frequencies to provide an alternative to driving for all journeys, including those made by shift workers when Night Tube and the new Silvertown Tunnel bus routes do not operate. Frequencies should be a minimum of every 15 minutes off-peak. There must be a legal requirement to provide this service at all hours of the day and night when the tunnel is open to motor traffic.

It is not clear who would have liability if a cycle was damaged in transit in either form of the proposed service, but particularly in the proposed minibus-with-trailer situation.

Our preference is for a service that is free at the point of use. If fares must be charged, they must be significantly cheaper than the proposed tolls for Blackwall and Silvertown. Otherwise driving will be more financially viable even for short journeys. We remain concerned that tolls for Blackwall and Silvertown will be seen as punitive by those driving, and that they may be abolished by a future administration—if this were to happen, no fares should be charged for the cycle shuttle either.

Finally, we are concerned that the proposed service will lose money and will quickly be reduced in quality, or withdrawn entirely, as has happened with the Dartford cycle bus (which infamously only made £45 per month¹ prior to its replacement with Land Rovers with trailers.) Ultimately, the only reason this proposal is needed is because TfL and DfT did not want to pay for what should've been included in the project from the start: a dedicated pedestrian/cycle bore. The result will be an ongoing liability that is not likely to attract a large number of users or open up journeys that are currently impossible.

GENERAL CONCLUSION ON THE CYCLE BUS

We do not believe a cycle bus is a viable solution for crossing the river with a cycle, and so we do not support it.

Newham Cyclists remains opposed to the Silvertown Tunnel as a crossing for general traffic. It should not have been approved in light of the Mayor's own transport strategy and climate commitments—particularly without a fixed pedestrian/cycle bore when there is such a clear need for an accessible non-motorised crossing of the Thames east of Tower Bridge. In future it will be seen as a failure of transport planning, and of value engineering.

We find it telling that the consultation material claims that there's no way a ferry could be ready in time for the tunnel's opening—this suggests that TfL's priority is to funnel more motor traffic across the river as soon as possible, and considers the cheapest and most sustainable modes as an afterthought at best and a nuisance at worst.

We are bitterly disappointed by the lack of ambition shown by TfL in addressing community severance and car dependency for people who need to cross the river. **Given this, and the cancellation and deferment of proposals such as the Rotherhithe bridge and pedestrian/cycle ferry, we have no confidence in TfL or the current Mayor ever delivering a viable cycle crossing east of Tower Bridge.**

¹ <https://www.kentonline.co.uk/dartford/news/the-dartford-tunnel-cycle-service-that-made-just-45-a-month-284932/#>

WHAT TFL NEEDS TO DO TO DELIVER VIABLE CYCLE CONNECTIVITY OVER THE THAMES

We invite TfL and the Mayor to prove us wrong, and demonstrate their commitment to their own transport strategy, by urgently prioritising pedestrian and cycle crossings of the Thames east of Tower Bridge. As we mentioned at the start, a viable crossing is one which allows all kinds of cycles, and does not require people to dismount, reverse, or lift their machine.

In the short term—in the next 18 months—TfL must look into:

- **Reducing or abolishing the cable car fare & extending opening hours** (would not be feasible for cargo cycles or many adapted cycles, but neither would the proposed cycle bus.)
- **Improving the Woolwich Ferry** by extending operating hours and improving frequency, removing the need for cyclists to dismount on the ferry decks, working with Newham and Greenwich Councils to redesign the approach roads, and addressing the reliability issue and long engineering closures. This would unlock a corridor for cycle freight across the river that is currently not viable due to poor reliability and limited operating hours.
- **Funding Greenwich Council to address the lift issues at the Greenwich and Woolwich tunnels.** These tunnels won't be suitable as cycle links, but even for pedestrians the unreliability of the lifts has become a long-running farce.

In the medium term—by 2030—there are a number of options that are more radical, but we believe are still achievable:

- **Improve the existing Canary Wharf Doubletree ferry, or begin a new Rotherhithe-Canary Wharf pedestrian and cycle ferry service** as discussed in the consultation materials. A Ro-Ro ferry would be considerably more attractive than a bus: more accessible to non-standard cycles and those carrying luggage or cargo, and without the need to dismount, reverse, lash one's cycle down, lift it into a rack, unload luggage, or sit separately from the cycle leaving it or its contents vulnerable to theft.

We particularly note from TfL's own modelling of a pedestrian/cycle ferry, obtained through the Freedom of Information Act,² that 'a free ferry would attract significant demand from cyclists.' Although a fare of £1.70 would deter users, we don't believe the modelling accounts for journeys that would not be made if the ferry did not exist. There is considerable international precedent for high-quality free pedestrian and cycle ferries, for instance across the IJ in Amsterdam.

- **Remove motor traffic from the Rotherhithe Tunnel** (with any exemptions being extremely limited.) This tunnel already only carries cars due to an ageing ventilation system, and would provide an ideal link between Cycleways 3 and 4. It would still mean those travelling from Newham to Greenwich would need to deviate from their route, but it could easily cut existing journey times in half (or do even better.)

In the longer term, we would like to see a commitment from TfL to deliver at least 2 new fixed links for walking and cycling by 2040. These could take the form of:

- New, ramped, cycle-only bores for the Greenwich or Woolwich foot tunnels
- A new pedestrian- and cycle-only bore for the Silvertown tunnel
- Reviving the Rotherhithe bridge proposal
- A bridge hung off the side of the Thames Barrier, as proposed by Lifschutz Davidson Sandilands:
<https://www.thamesbarrierbridge.com/>
- Pedestrianising the Victorian bore of the Blackwall Tunnel—which, by TfL's own admission, is not suitable for modern vehicular traffic and was built with a bend to prevent horses from bolting

We believe all of the above options would be more viable for cycling than a bus that allows people to bring bicycles as luggage. Critically, in addition to serving people who already (laboriously) cross the river with a cycle, high-quality crossings

² https://www.whatdotheyknow.com/request/silvertown_tunnel_cycle_ferry_se#incoming-2391759

would unlock journeys that are currently impossible without a car, while poor quality box-ticking exercises (like the cycle bus) will continue to suppress demand.

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