

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

**We neither support nor oppose these proposals.**

We generally support a fair & equitable system of road user charging. **But this requires practical alternatives** for people to make their journey without driving.

**TfL has no coherent strategy for non-motorised river crossings in east London, meaning there is no practical alternative to driving for many journeys.** Future political campaigns and administrations will target the user charge for abolition, allowing unfettered cross-river motor traffic.

**We oppose the Silvertown Tunnel as a crossing for private motor traffic.** It is a 1960s-quality urban motorway project that shouldn't have been approved. We still 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.

<b>Foreword.....</b>	<b>3</b>
<b>Charge Level Proposals.....</b>	<b>4</b>
<b>Negative impacts at other river crossings.....</b>	<b>5</b>
<b>Discounts.....</b>	<b>6</b>
<b>Overnight journeys.....</b>	<b>7</b>
<b>The value proposition of driving vs. other modes.....</b>	<b>8</b>
<b>The risk of a future administration abolishing user charges.....</b>	<b>11</b>
<b>TfL’s strategy for non-motorised river crossings in east london.....</b>	<b>12</b>
<b>Conclusion.....</b>	<b>15</b>

## FOREWORD

TfL is at pains to explain that this consultation is specifically about the proposed user charges for the Silvertown and Blackwall Tunnel. It does not cover the mitigation measures<sup>1</sup> which have supposedly already been agreed.

**However, we do not believe it is feasible, or appropriate, to respond to a consultation proposing to charge drivers who use the Silvertown or Blackwall tunnels without taking alternatives—including the mitigation measures—into account.** People will still need to travel between east and south-east London. For the user charge to have its desired effect of avoiding any overall increase in cross-river traffic, there must be viable alternatives to driving. It would be remiss to discuss the proposed charges without discussing the supporting measures that TfL has already arranged. To adopt a crude analogy, we cannot talk about the stick without also talking about the carrot.

**Fundamentally, Newham Cyclists believes that access to transport is a matter of social justice and equality.** We exist to help more people in Newham access cycling because cheap, reliable transport is an enabler for social mobility, particularly for non-discretionary journeys that people have to make no matter what. People deserve to be able to make those journeys in a way that is affordable, safe, convenient, and environmentally sound.

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<sup>1</sup> Referred to in the consultation materials as the “green and fair package”.

## CHARGE LEVEL PROPOSALS

We are unconvinced that the proposed charges are set high enough to deter people from choosing to drive journeys that could be made by public transport.

**The proposed off-peak charge of £1.50 for a motorcycle, car, or small van is cheaper than a bus fare (£1.75).** Even taking into account the “green and fair” pledge to make bus routes 108, 129, SL4, and the cycle shuttle service free for “at least 12 months,” this means that the bus is a poor value proposition for anyone who already has access to a car, and whose journey is not directly on one of the (for-now) free bus routes.

The value proposition continues to swing even more in favour of the car for:

- Journeys involving changes of bus. Even though the journey through the tunnel itself might be free, people would still have to pay for any connecting bus journey on either end—potentially even twice, if the time between touch-ins is longer than 60 minutes.
- Journeys where more than one adult is travelling. While we have no issue with the Tunnel charging per-vehicle rather than per-person (in fact a higher vehicle occupancy would be beneficial) this inherently makes group travel by private car more economical than by bus or other modes of public transport.
- Journeys after 10pm and before 6am, when no charges will be levied for drivers in either tunnel. In this case someone who already has access to a car has no reason whatsoever to go out of their way to use the 108 bus (slow, inconvenient, and £1.75 if more than one stage is involved) rather than driving (free.)
- Journeys taking if and when the free bus travel on the cross-river routes is withdrawn, since the free journeys are only guaranteed for the first year of the Tunnel’s opening.

## NEGATIVE IMPACTS AT OTHER RIVER CROSSINGS

**We are concerned that some drivers will balk at the headline charges and seek an alternative ‘free’ route across the river.** While this may be a false economy for some with the cost of fuel, the headline cost will be powerful, particularly for

- Those driving into London whose only interaction with TfL may be paying fees such as the new tunnel user charge
- Price-sensitive drivers
- People who select the ‘avoid tolls’ option on their sat nav

The two chargeable tunnels are surrounded on either side by crossings that are free for motorists: the Rotherhithe Tunnel and the Woolwich Ferry. Further west is Tower Bridge. All have considerably less capacity than either Blackwall or Silvertown.

- Despite recent investment in the Woolwich Ferry and a welcome improvement in reliability and operating hours, during periods of high demand it suffers from long queues, which often spill out into residential streets in our borough, adding lengthy delays in the order of 1 hour for drivers. This also makes the ferry approach roads less attractive and more dangerous for people walking and cycling, including local residents.
- The Rotherhithe Tunnel’s ventilation system is life-expired to the point where it can only carry cars, not even light vans. While in principle it does carry pedestrians and cyclists, the environment for these users is appalling due to traffic fumes, the narrow footway, and traffic volumes; very few people choose to use it, even at current traffic levels.
- Tower Bridge is outside the Congestion Charge zone, making it a seemingly ‘free’ alternative to the Silvertown and Blackwall Tunnels. It already suffers serious issues with chronic congestion, pedestrian and cycle safety issues, and bus performance.

In our view, more traffic being displaced to these lower-capacity river crossings would mean the Silvertown Tunnel scheme has not only failed to meet its objectives of reducing congestion, but in fact actively made the situation worse.

**We insist that TfL implements measures to stop drivers from diverting to the Woolwich Ferry, Rotherhithe Tunnel, or Tower Bridge in order to avoid paying the user charge.**

## DISCOUNTS

- We have no objections to the proposed 100% discount for blue badge holders.
- We have no objections to the proposed 50% discount for low-income residents receiving certain welfare payments.
  - We do highlight that the running costs of a car are, in themselves, prohibitively expensive for many low-income Londoners, and may be a direct contributor to financial pressures in some households. These people might have been better served by a step-free crossing which could be used without a car at all times of day and night.

## OVERNIGHT JOURNEYS

We specifically note that there will be no user charge applied to overnight journeys through either tunnel, between 10pm and 6am.

We find this particularly troubling, on account of there being:

- Only one night bus route (existing 24-hour route 108) crossing the river in east London
- No Night Tube (Jubilee line) or Night Overground (Windrush line) except on Friday and Saturday nights
- No overnight service on the DLR
- No overnight service on the cable car, with service finishing at 9pm Sun-Thu
- No overnight service on the Woolwich Ferry, with service finishing at 9:45pm
- No overnight service on the cycle shuttle bus, with service finishing at 9:30pm

This suggests that TfL recognises that people need to travel overnight—particularly shift workers, night-time economy workers, and those who need to be at work early. But TfL does not seem especially interested in helping these people make their journeys, unless they have access to a car or motorbike.

**This is not in line with the Mayor’s Transport Strategy goal of 80% of journeys walked, cycled, or using public transport by 2041. It is also not in line with the Mayor’s commitment to net zero by 2030, nor the Mayor’s preferred Accelerated Green pathway which requires a 27% reduction in vehicle km driven by 2030.<sup>2</sup>**

We also wish to highlight that the overnight cross-river services for cycling that *are* provided finish very early, compared to other TfL modes which generally finish between 11:30pm and 1am Mon-Sat.

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<sup>2</sup>

<https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/climate-change/zero-carbon-london/pathways-net-zero-carbon-2030>

# THE VALUE PROPOSITION OF DRIVING VS. OTHER MODES

Our main objection to the Silvertown Tunnel scheme has always been that it is a crossing for general motor traffic, at a point when TfL should be looking to decrease general traffic levels and provide alternative ways for people to travel. A new motorway tunnel on a similar alignment to the existing one does not unlock any new journeys; it will simply encourage more people to drive, and runs the risk of abstracting revenue from other TfL cross-river modes.

In the table below we compare the mode situation post-Tunnel opening in terms of headline costs throughout the day, availability, and practicality in terms of step-free access. **Note that we are not including the DLR station pairs between which free journeys have been agreed for at least the first year of Tunnel operation.** This is because most journeys are not just short hops across the river, but where the river crossing is part of a longer journey. Instead, we are showing some representative examples of longer journeys which involve river crossings, with routes indicated by the [TfL journey planner](#).

Mode	Step-free?	Cycles?	Headline cost					
			Northbound at:			Southbound at:		
			0800	1400	0430	1700	2100	2330
<b>Jubilee line</b> North Greenwich to Canning Town	Yes	No	£1.90	£1.80	<i>Service closed</i>	£1.90	£1.80	£1.80
<b>DLR</b> Lewisham to Pudding Mill Lane	Yes	Off peak only	£1.90	£1.80	<i>Service closed</i>	£1.90	£1.80	£1.80
<b>DLR</b> Woolwich Arsenal to London City Airport	Yes	Off peak only	£2.10	£1.90	<i>Service closed</i>	£2.10	£1.90	£1.90



Mode	Step-free?	Cycles?	Headline cost					
			Northbound at:			Southbound at:		
			0800	1400	0430	1700	2100	2330
<b>National Rail &amp; DLR</b> Bexley to Pontoon Dock via Dartford	Boarding ramps	Off peak only	£4.60	£3.50	<i>Service closed</i>	£4.60	£3.50	<i>Service closed</i>
<b>Bus</b> Leyton to Kidbrooke	Yes	No	£3.50 <sup>3</sup>	£3.50	<i>Service closed</i> <sup>4</sup>	£3.50	£3.50	<i>Service closed</i>
<b>National Rail &amp; tube</b> Leyton to Kidbrooke	No	No	£3.40	£2.90	<i>Service closed</i>	£3.40	£2.90	<i>Service closed</i>
<b>Cycling via cycle bus</b>	Yes	Yes	free for now	free for now	<i>Service closed</i>	free for now	free for now	<i>Service closed</i>
<b>Cycling/walking via Woolwich Ferry</b>	Yes	Dismounted only	free	free	<i>Service closed</i>	free	free	<i>Service closed</i>
<b>Cycling/walking via Greenwich/Woolwich Foot Tunnel</b>	Unlikely due to lift reliability	Dismounted only	free	free	free	free	free	free

<sup>3</sup> In principle the TfL journey planner suggests that it *might* be possible in some circumstances to make a third touch-in within 1 hour of the first. But this is dependent on certain traffic circumstances and so it would be prudent to budget for two separate £1.75 bus hopper fares, even accounting for the free journey on route 108 in the middle.

<sup>4</sup> No night buses serve Kidbrooke Sun-Thu.

Mode	Step-free?	Cycles?	Headline cost					
			Northbound at:			Southbound at:		
			0800	1400	0430	1700	2100	2330
<b>Cycling via London Cable Car</b>	Mostly	Yes, no e-bikes <sup>5</sup>	free <sup>6</sup>	£6.00 <sup>7</sup>	<i>Service closed</i>	£6.00	£6.00	<i>Service closed</i>
<b>Cycling via Doubletree Ferry</b>	Yes, with new vessel	Yes	£4.10	£4.10	<i>Service closed</i>	£4.10	£4.10	<i>Service closed</i>
<b>Driving in a car via Blackwall or Silvertown Tunnel</b>	n/a	n/a	£4.00	£1.50	free	£4.00	£1.50	free

The common theme we have observed is this: the step-free options to cross the river, particularly those that carry cycles:

- finish too early, and do not run overnight at all with the exception of bus route 108;
- In the case of the Cable Car and Doubletree ferry, are considerably more expensive than the Tunnel road user charge;
- In some cases they are agreed to be free, 'for now,' but may well charge a fare in future.

<sup>5</sup> E-bikes are currently banned from the Cable Car [due to a 'review of the safety approach'](#) as of 1 September 2024. We find the basis for this questionable: while we acknowledge the fire risk posed by unsafe e-cycle conversions using unregulated batteries, these typically only manifest as a fire when the batteries are being charged. We also highlight a potential inclusion issue since this withdraws one of the only step-free river crossing options from people who may depend on an e-cycle as a mobility aid.

<sup>6</sup> The cable car is free for people carrying cycles before 9:30am, but not in the evening.

<sup>7</sup> We are aware of the £17 ten-journey carnet option, which is poorly-advertised and only available by asking at the cable car ticket office. There is no kind of pay-as-you-go price capping on Oyster or contactless that we are aware of. As such the pay-as-you-go headline fare for the Cable Car is £6, as this is what most people pay.

The problem becomes clearer when comparing the cost of the step-free options to the new Tunnel user charges.

Mode	Tunnel charge (car/small van)	Doubletree ferry	Cable car	DLR (one zone, not zone 1) <sup>8</sup>	Bus (2 stages, Hopper fare) <sup>9</sup>
<b>Price (peak)</b>	£4	£4.10	£6	£1.90	£1.75
<i>Difference vs. peak Tunnel charge</i>		+2.50%	+50.00%	-52.50%	-56.25%
<b>Price (off-peak)</b>	£1.50	£4.10	£6	£1.80	£1.75
<i>Difference vs off-peak Tunnel charge</i>		+173.33%	+300.00%	+20.00%	+16.67%

In this selection of river crossing options, the DLR and multi-stage bus journeys are cheaper only during peak hours, with off-peak journeys being cheaper to drive. In both cases, the cycle-friendly options cost considerably more than the Tunnel user charge—with the single cable car fare being **four times** the cost of the off-peak Tunnel charge.

<sup>8</sup> We presume that these journeys are *not* between the exact station pairs of Island Gardens and Cutty Sark, nor King George V and London City Airport, as indicated in the 'green and fair' package. Most journeys are not short hops across the river.

<sup>9</sup> We presume in this instance that the origin or destination point is not directly on route 108, 129, or SL4, and so a £1.75 fare will be payable for the non-Tunnel leg of the journey.

# THE RISK OF A FUTURE ADMINISTRATION ABOLISHING USER CHARGES

The entire business case for the Tunnel is based on charging users, in order to

- Pay back the c. £2 billion cost of construction through the PFI
- Avoid increased traffic levels at either tunnel

**We generally support a fair and equitable form of road user charging, so we do support the principle of charging private motor traffic in the Blackwall Tunnel, and (if opened to general traffic) the Silvertown Tunnel.**

However, we can understand why drivers might resent having to pay a charge to cross the river, even though we don't agree and think there should be a charge.

We don't think the charge is high enough to force people who currently drive to switch to another mode, particularly for non-discretionary journeys, and particularly when the alternatives are not up to snuff.

Certain political figures and influencers are already circulating anti-charge literature and petitions, branding it the "tunnel tax" and tying it to personal attacks on the Mayor's character. **Given the attitude of recent political administrations at the national and borough level to restrictions and fees levied on drivers, we feel it is only a matter of time before a political party is elected on a pledge to abolish the user charge at Blackwall and Silvertown.** This might be during London mayoral elections, or (more likely) at national level where a future Government, seeking votes from those who don't live locally, could seek to pay off the DBMO contract and abolish the charge through primary legislation. In light of recent misinformation about ULEZ, low-traffic neighbourhoods, and 20mph speed limits spread by national newspapers, media platforms, politicians, and policy influencers, TfL and the Mayor would be very naïve not to acknowledge this risk.

**If and when a future administration decides to abolish the charge, the journey time savings will collapse, and congestion will significantly increase.** Given the political upheaval we have witnessed over the last 10-20 years and the

increasing cost of living crisis, we would characterise the removal of the road user charge as a ticking time bomb that will lead to unfettered cross-river motor traffic, congestion, and pollution.

## TFL'S STRATEGY FOR NON-MOTORISED RIVER CROSSINGS IN EAST LONDON

**To mitigate the risk of people viewing the tunnel user charge as unfair, it is important to provide alternatives that do not involve driving for all journeys, at all times of the day and night.**

Unfortunately TfL cancelled its plans for a fixed walking and cycling crossing at Rotherhithe in 2019 on affordability grounds<sup>10</sup>. In 2023 we described TfL's plan for the post-Silvertown cross river bus network as 'threadbare'<sup>11</sup>.

We do not consider the cycle bus a viable crossing for people cycling, so did not support it at consultation in September 2023;<sup>12</sup> we stand by this position, particularly given the proposed 9:30pm finish time which is much too early, and the unclear future charging model for the service once the initial "free" year ends. We also note that between the consultation ending and the consultation report being prepared, the planned frequency has dropped from "six bus shuttles per hour" (i.e. every 10 minutes)<sup>13</sup> to "a high frequency with a bus at least every 12 minutes" (i.e. five buses per hour.)<sup>14</sup>

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<sup>10</sup> <https://www.newcivilengineer.com/latest/tfl-shelves-600m-rotherhithe-crossing-plan-21-06-2019/>

<sup>11</sup> <https://www.newhamcyclists.org.uk/consultation-response-silvertown-tunnel-bus-network/>

<sup>12</sup> <https://www.newhamcyclists.org.uk/silvertown-cycle-bus-embarrassing/>

<sup>13</sup> "Silvertown Tunnel - Cross River Cycling Service - About these proposals" - "Our indicative operating plan for this service suggests a starting frequency of six bus shuttles per hour." <https://haveyoursay.tfl.gov.uk/silvertown-cycling-service>

<sup>14</sup> "Having considered all the feedback received during the consultation, we will be proceeding with our preferred option of a bus shuttle service for cyclists. The shuttle service will: [...] Run at a high frequency with a bus at least every 12 minutes" <https://haveyoursay.tfl.gov.uk/silvertown-cycling-service>

TfL has repeatedly declined to take any role in funding the long term future of the Greenwich and Woolwich foot tunnels, leaving the cash-strapped Newham and Greenwich councils to negotiate amongst themselves about who should pay for the repairs to the lifts.<sup>15</sup>

**One year ago, we stated that we had no confidence in TfL or the current Mayor ever delivering a viable cycle crossing east of Tower Bridge, despite the clear need for one.** Unfortunately, our assessment is unchanged 12 months later. The urgency of these is now greater than ever, given (as we have indicated above) the real risk that a future administration of London or the national Government could seek to abolish the road user charge at Blackwall and Silvertown; and also keeping in mind the need for climate and energy resilience, the Mayor's commitment to Net Zero by 2030, and the Mayor's preferred Accelerated Green pathway requiring a 27% reduction in vehicle km driven by 2030.

**We again invite TfL and the Mayor to prove us wrong, and demonstrate their commitment to their own transport strategy, by producing, and then delivering, a plan for pedestrian and cycle crossings of the Thames east of Tower Bridge.** A viable cycle crossing is one which allows all kinds of cycles, does not require people to dismount, reverse, or lift their machine, and is available for use 24/7.

**Our obvious preference would have been for the Silvertown Tunnel to not open to general traffic, and for it to be repurposed as the crossing exclusively for buses, walking, and cycling that is urgently needed in the area.** However, we understand that at this stage, TfL is unlikely to entertain this option.

In the short term—in the next 6 months and **before** the Tunnel opens—TfL must look into:

- **Reducing or abolishing the cable car fare & extending opening hours. The £6 fare is 50% higher than the £4 peak Tunnel charge, and 4 times the off-peak Tunnel charge of £1.50.** At the very minimum, the contactless cable car fare should be reduced to £1.70, effectively making a pay-as-you-go single the same as the current per-journey cost of a carnet ticket. A reduced fare of £1.40 (10p less than the off-peak Tunnel user charge) would be even better.

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<sup>15</sup> <https://greenwichwire.co.uk/2024/07/27/woolwich-foot-tunnel-lift-works-greenwich-newham-councils/>

The issue with e-cycles also needs to be resolved to allow people who rely on them as mobility aids to use the cable car again.

- **Working with Thames Clippers to reduce or abolish the Cross River fare for the Doubletree ferry & extend opening hours.** The proposed new Ro-Ro ferry and new pier is welcome. **But the fare of £4.10 is 10p more than the £4 peak Tunnel charge, and 2.73 times the off-peak Tunnel charge of £1.50.**
- **Improving the Woolwich Ferry.** While the newly extended hours are welcome, 9:45pm is still too early a finish, and 6am too late a start, for some shift workers or those carrying freight. TfL should also look at removing the need for cyclists to dismount on the ferry decks, and work with Newham and Greenwich Councils to redesign the approach roads.
- **Analysing usage of the cycle bus once it begins.** If no-one chooses to use it when it is free, there is frankly no point in continuing the service. If people *do* choose to use it, it must remain free for the entire lifetime of the service, and frequencies should be increased where the demand is present (e.g. at peak times.) We would also insist TfL extends the opening hours and provides an overnight service.

**In the medium term, by 2030, we would like TfL to deliver one viable river crossing for cycling in east London.** We do not believe this is too much to ask since there are currently five viable crossings for car drivers east of Tower Bridge, but none for cycling. On these timescales, the most practical choices could be:

- removing general traffic from an existing crossing (e.g. Rotherhithe Tunnel<sup>16</sup> or Tower Bridge)
- a frequent Ro-Ro ferry, as long as it runs 24/7 and is either free or significantly more affordable than the current Thames Clippers cross river fare

**In the longer term, we want TfL to commit to at least 2 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

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<sup>16</sup> See City Infinity UK's Reimagine Rotherhithe proposal: <https://cityinfinity.co.uk/2024/08/05/reimagine-rotherhithe/> which would replace the roadway with a wide cycleway and footways, allowing controlled emergency vehicle access using passing places.

- A new pedestrian- and cycle-only bore for the Silvertown tunnel
- Reviving the Rotherhithe bridge proposal, or proposing a tunnel at the same location
- 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.



## CONCLUSION

As we mentioned before, it wouldn't provide a full picture to provide any commentary on the tunnel user charges without looking at the alternatives available, including the "green and fair package" that TfL has supposedly already agreed.

**The unfortunate reality is that there is no way to make a new motorway tunnel "green" or "fair" in 2024.** The overwhelming majority of vehicles on the streets burn petrol and/or diesel, and this will remain the case for a long time—new petrol and diesel cars are still the majority of cars being built and sold today. Even electric motor vehicles produce particulate pollution in the form of brake dust and tyre material dispersed into the air. Moreover, the cost of owning and operating a car is prohibitively expensive for some Londoners; at the same time, research commissioned in 2022 by (at the time London Assembly member) Siân Berry reported that 21% of Londoners feel "forced" to own a car.<sup>17</sup>

**A true "green and fair" package would have been what should have been factored into the Tunnel project from the start—an additional ramped pedestrian and cycle bore, emerging at the Royal Docks and Greenwich Peninsula.**

These would have provided a viable alternative to allow people to cross the river without a car and without having to pay the road user charge.

**As it stands, we do not believe the proposed road user charge is high enough to deter people from making unnecessary journeys or switching to a more sustainable mode.** It will, however, be considered unpopular, and targeted for abolition by political campaigns; come the next political cycle, the next administration could choose to abolish the charge under the pretext of taking a financial stressor away from hardworking families, etc.

**It is particularly concerning to us that the proposed off-peak tunnel user charge is 25p cheaper than a single bus fare. It is also telling that even at peak times, the tunnel user charge for cars is £2 cheaper than the Cable Car fare, and 10p cheaper than the Doubletree Rotherhithe ferry.**

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<sup>17</sup> <https://www.london.gov.uk/press-releases/assembly/sian-berry/londoners-feel-forced-to-have-a-car>

To return to our somewhat crude analogy at the start: the stick is not big enough to be a deterrent, but is big enough to be annoying. Meanwhile, the carrot isn't substantial enough to get people to move to a mode other than driving.

**We urge TfL to work with the national Government to invest in and urgently progress the desperately-needed walking and cycling river crossings that east London has needed for decades.**

**We neither support nor oppose these proposals.**

We generally support a fair & equitable system of road user charging. **But this requires practical alternatives** for people to make their journey without driving.

**TfL has no coherent strategy for non-motorised river crossings in east London, meaning there is no practical alternative to driving for many journeys.** Future political campaigns and administrations will target the user charge for abolition, allowing unfettered cross-river motor traffic.

**We oppose the Silvertown Tunnel as a crossing for private motor traffic.** It is a 1960s-quality urban motorway project that shouldn't have been approved. We still 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.