

# Agenda

**Meeting: Board**

**Date: Wednesday 4 December 2024**

**Time: 10:00am**

**Place: Chamber, City Hall - Kamal  
Churchie Way, London E16 1ZE**

## Members

Sadiq Khan (Chair)

Seb Dance (Deputy Chair)

Zoë Billingham CBE

Prof Greg Clark CBE

Councillor Ross Garrod

Anurag Gupta

Deborah Harris-Ugbomah

Tanya Joseph

Arthur Kay

Anne McMeel

Mark Phillips

Marie Pye

Keith Richards OBE

Omid Shiraji

Peter Strachan

Sara Turnbull

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## Further Information

If you have questions, would like further information about the meeting or require special facilities please contact: Shamus Kenny, Head of Secretariat; Email: [ShamusKenny@tfl.gov.uk](mailto:ShamusKenny@tfl.gov.uk)

For media enquiries please contact the TfL Press Office; telephone: 0343 222 4141; email: [PressOffice@tfl.gov.uk](mailto:PressOffice@tfl.gov.uk)

Andrea Clarke, General Counsel  
Tuesday 26 November 2024

**Agenda  
Board  
Wednesday 4 December 2024**

**1 Apologies for Absence and Chair's Announcements**

**2 Declarations of Interests**

General Counsel

**Members are reminded that any interests in a matter under discussion must be declared at the start of the meeting, or at the commencement of the item of business.**

**Members must not take part in any discussion or decision on such a matter and, depending on the nature of the interest, may be asked to leave the room during the discussion.**

**3 Minutes of the Meeting of the Board held on 16 October 2024  
(Pages 1 - 12)**

General Counsel

**The Board is asked to approve the minutes of the meeting of the Board held on 16 October 2024 and authorise the Chair to sign them.**

**4 Matters Arising, Actions List and Use of Delegated Authority  
(Pages 13 - 22)**

General Counsel

**The Board is asked to note the updated actions list and the use of authority delegated by the Board.**

**5 Commissioner's Report (Pages 23 - 56)**

Commissioner

**The Board is asked to note the Commissioner's Report, which provides an overview of major issues and developments since the report to the meeting on 16 October 2024 and updates Members on significant projects and initiatives.**

**6 Finance Report - Period 7, 2024/25** (Pages 57 - 74)

Chief Finance Officer

**The Board is asked to note the Finance Report and that the TfL 2024/25 Budget and the TfL 2024 Business Plan remain in place and are the basis for Financial Authority for financial commitments that may be made before the TfL 2025/26 Budget is approved in March 2025.**

**7 Silvertown and Blackwall Tunnels User Charges** (Pages 75 - 508)

Chief Customer and Strategy Officer

**The Board is asked to approve the initial user charges for the Silvertown and Blackwall Tunnels as set out in the Statement of Charges at Appendix 1 of the paper.**

**8 Travel in London 2024 Annual Overview Report** (Pages 509 - 574)

Chief Customer and Strategy Officer

**The Board is asked to note the Travel in London 2024 Annual overview report.**

**9 Report of the meeting of the Finance Committee held on 19 November 2024** (Pages 575 - 578)

Committee Chair, Anne McMeel

**The Board is asked to note the report.**

**10 Report of the meeting of the People and Remuneration Committee held on 20 November 2024** (Pages 579 - 582)

Committee Chair, Peter Strachan

**The Board is asked to note the report.**

**11 Report of the meeting of the Audit and Assurance Committee held on 27 November 2024** (Pages 583 - 586)

Committee Chair, Mark Phillips

**The Board is asked to note the report.**

**12 Report of the meeting of the Customer, Sustainability and Operations Panel to be held on 28 November 2024** (Pages 587 - 590)

Panel Chair, Marie Pye

**The Board is asked to note the report.**

**13 Report of the meeting of the Safety and Security Panel to be held on 2 December 2024** (Pages 591 - 592)

Panel Chair, Zoë Billingham CBE

**The Board is asked to note the report.**

**14 Any Other Business the Chair Considers Urgent**

**The Chair will state the reason for urgency of any item taken.**

**15 Date of Next Meeting**

**Wednesday 5 February 2025, at 10.00am.**

## Transport for London

### Minutes of the Meeting

**Chamber, City Hall, Kamal Chunchie Way, London E16 1ZE  
10.00am, Wednesday 16 October 2024**

#### **Members**

Sadiq Khan (Chair)  
Seb Dance (Deputy Chair)  
Zoë Billingham CBE  
Councillor Ross Garrod  
Deborah Harris-Ugbomah  
Tanya Joseph  
Arthur Kay  
Anne McMeel  
Mark Phillips  
Marie Pye  
Keith Richards OBE  
Omid Shiraji  
Peter Strachan  
Sara Turnbull

#### **Government Observer**

Samantha Collins-Hill Deputy Director, London Partnerships and Delivery,  
Department for Transport (via Teams)

#### **Executive Committee**

Andy Lord	Commissioner
Fiona Brunskill	Chief People Officer
Andrea Clarke	General Counsel
Stuart Harvey	Chief Capital Officer
Claire Mann	Chief Operating Officer
Lilli Matson	Chief Safety, Health and Environment Officer
Rachel McLean	Chief Finance Officer
Alex Williams	Chief Customer and Strategy Officer
Tricia Wright	Chief Officer – Pensions Review

#### **Staff**

Patrick Doig	Group Finance Director and statutory Chief Finance Officer
Jackie Gavigan	Secretariat Manager
Lorraine Humphrey	Director of Risk and Assurance
Shamus Kenny	Head of Secretariat
Dharmina Shah	Interim Chief of Staff to the Commissioner

## **55/10/24 Apologies for Absence and Chair's Announcements**

Apologies for absence had been received from: Professor Greg Clark CBE and Anurag Gupta. The meeting was quorate. Samantha Collins-Hill attended the meeting in place of Emma Ward.

The Chair welcomed everyone to the meeting. The meeting was broadcast live on the Greater London Authority website and on TfL's YouTube channel, to ensure the public and press could observe the proceedings and decision-making.

As this was the first meeting of the Board since the change in membership on 9 September 2024, the Chair thanked Members that had been reappointed for agreeing to continue to serve on the Board and extended a warm welcome to the new Members of the Board: Zoë Billingham CBE, Deborah Harris-Ugbomah, Tanya Joseph, Arthur Kay, Keith Richards OBE, Omid Shiraji and Sara Turnbull.

The Chair drew the Board's attention to four recent director appointments at TfL, following competitive recruitment processes: Carl Eddleston as Director of Network Management and Resilience, Richard Jones as Director of Asset Performance Delivery, Marian Kelly as Director of Safety, Health and Environment Business Partnering – TfL Operations, and Lorna Murphy as Director of Buses.

The Chair reminded those present that safety was paramount at TfL and encouraged Members to raise any safety issues during discussions on a relevant item or with the appropriate member of the Executive Committee after the meeting.

## **56/10/24 Declarations of Interests**

The declaration of interests for new Members of the Board had been published and there were no changes to the declarations of Members that had been reappointed.

Members confirmed that their declarations of interests, as published on [tfl.gov.uk](https://tfl.gov.uk), were up to date and there were no interests to declare that related specifically to items on the agenda.

## **57/10/24 Minutes of the Meeting of the Board held on 24 July 2024**

**The minutes of the meeting of the Board held on 24 July 2024 were approved as a correct record, and the Chair was authorised to sign them.**

## **58/10/24 Matters Arising, Actions List and Use of Delegated Authority**

Andrea Clarke introduced the item. There had been no uses of Chair's Action, nor any Mayoral Directions to TfL since the last meeting of the Board on 24 July 2024.

On 29 August 2024, the Deputy Chair exercised the authority delegated by the Board, on 24 July 2024, to make appointments to the Committees and Panels once the appointments to the Board had been confirmed.

The delegation of authority to the Audit and Assurance Committee to approve the Statement of Accounts had not been exercised yet, as the audit of the Accounts was still in progress. The deadline for the approval of the Accounts had been extended.

The paper provided an update on progress against actions agreed at previous meetings. In relation to bus lane access for emergency vehicles (Action 43/07/24(1)) officers were asked to check whether access covered the NHS Blood and Transplant service vehicles. **[Action: Alex Williams]**

**The Board noted the paper and the actions list.**

## **59/10/24 Commissioner's Report**

The Commissioner congratulated Members on their appointment to the Board and welcomed new Members to their first meeting of the Board, noting that he and his executive had met with Members on several occasions since 9 September 2024.

He introduced the report, which provided a review of the major issues and developments since the last meeting, and updated Members on significant projects and initiatives.

The key issues arising from the overview and discussion are summarised below:

- 1 Safety was TfL's absolute priority. TfL's network safely carried millions of passengers every day and it continued to make progress towards its Vision Zero action plan. Anyone who was seriously injured or lost their life on London's transport network was one too many. The report covered five incidents since the previous meeting that had sadly resulted in fatalities. Everyone at TfL expressed their deepest sympathies and condolences to the families and friends of those involved and support was available for those affected. TfL had revised its processes to ensure that it contacted those affected.
- 2 TfL was committed to learning from every incident and sharing it with other transport operators where appropriate. The report provided information on some of the programmes and policies that were being delivered to further improve safety across the network, including the safer junctions programme and the Bus action plan. TfL had recently published data that showed that road fatalities in 2023 had reduced by 30 per cent against the 2010-2014 baseline. That reduction was four times greater in London than the rest of Great Britain, as a direct result of the work TfL was doing to ensure its system was as safe as possible. TfL was not complacent and was determined to eliminate fatalities as part of its Vision Zero action plan.
- 3 The Commissioner also commented on three serious incidents involving TfL colleagues while off-duty. One had been fatally shot, one had been fatally stabbed and another had been seriously injured. He expressed his deepest sympathies to the family, friends and colleagues of those that had died and his support to the victim of the stabbing at Victoria station. All three incidents were under police investigation and arrests had been made in two of the cases. TfL was doing all it could to support the investigations and those impacted.

- 4 On 1 September 2024, suspicious cyber activity was detected on TfL's network. To protect the security of TfL's systems and data, immediate action was taken to ensure that any further impact was minimised, by limiting and shutting off access to some systems. The impact on the delivery of transport services was extremely limited, although there had been, and continued to be impacts affecting colleagues and some customers. TfL would continue to keep customers informed as it recovered from the incident and would process any refunds as quickly as possible when it was able to do so.
- 5 The cyber incident had resulted in some customer data being accessed, including names, contact details and, in some cases, bank account details. TfL had contacted just under 5,000 customers who may have been affected as a precautionary measure, and offered them support and guidance.
- 6 The Commissioner thanked the thousands of colleagues who had really pulled together in recent weeks to address the issue and to continue delivering services. TfL had received wide praise and recognition for its response. He also thanked customers for their patience and assured them that work was underway to restore access to concessionary travel passes and other impacted services as soon as possible. Bus operators and station staff had been instructed to be aware of the impact on vulnerable passengers, which included children who could travel for free.
- 7 Members had received, and would continue to receive, briefings on the cyber incident, the actions taken and the impact on customers and colleagues. The consequences of the event would continue for some months ahead and the current focus was on recovery. TfL would undertake a full review of the incident and lessons learnt. Information on the incident and lessons learnt would be shared with other public bodies and transport operators as appropriate. Public information on the incident would remain limited due to the ongoing criminal investigation.
- 8 The Commissioner was disappointed that ASLEF and RMT members had voted in favour of industrial action, following constructive discussions on a pay offer that was in line with offers agreed with other Department for Transport and train operating companies on the national rail network. The TfL offer was considered to be fair to colleagues and affordable. He urged the trade unions to continue discussions and avoid any unnecessary and damaging industrial action.
- 9 TfL continued to actively engage with key stakeholders, including Simon Lightwood MP, the new Under Secretary of State for Transport, attendance at all three major political party conferences and engagement with boroughs. The Commissioner, along with US and UK government officials, attended American Public Transport Association's annual conference, where it was clear that TfL was held in very high regard. These engagements provided valuable opportunities to share best practice, discuss approaches to common issues in transport, and learn from colleagues across the industry.
- 10 Alongside the Secretary of State for Transport, the Mayor and Deputy Mayor, the Commissioner visited Goole for the official opening of Siemens' new Rail Village,



where TfL's brand-new fleet of state-of-the-art Piccadilly line trains would be produced. The Rail Village showcased the value to the wider UK of investment in TfL and supporting the Government's growth, jobs and skills agenda.

- 11 The first new Piccadilly line train had arrived in London to undergo testing. The trains would enter passenger service by the end of 2025. The £3bn modernisation programme would boost journey times, frequencies, and reliability, while also making the line more sustainable and significantly enhancing the customer experience.
- 12 TfL continued to discuss long-term capital funding requirements with the Government and hoped to reach an acceptable agreement shortly. The importance of delivering improvements for passengers was recognised by the Government. The Commissioner commended the appointment of Laura Shoaf as Chair of Shadow Great British Railways and looked forward to working with her and her team as the Government's reform of the railways progressed.
- 13 Members welcomed the plans in the Equity in Motion document and noted the continued work to improve service accessibility through infrastructure improvements. The new rolling stock for the Piccadilly line and DLR had been designed to the highest accessibility standards with input from stakeholders, including the Independent Disability Advisory Group, and this would also be part of the process for new trams.
- 14 The new ticket hall at Paddington station provided direct, step-free access from street to the Bakerloo line platforms and the design had also considered the needs of people with visual impairments and other sensory needs. TfL was undertaking feasibility work on making more stations step-free and would work with boroughs and other stakeholders on this, complementary work on the public realm, the use of the Community Infrastructure Levy and other service improvements. TfL worked with Network Rail to learn any lessons from its use of the Department for Transport's Access for All scheme, so these could be applied to London Overground schemes (London Underground was excluded from this funding source). The Mayor had also allocated an additional £3m per annum to invest in refurbishing existing, and installing new public toilets at stations and, as previously requested, a report on the proposed programme and prioritisation would be shared with Members.
- 15 Department for Transport regulations had resulted in e-mobility trials being extended to a third year. TfL worked closely with London Councils and individual boroughs and supported a national framework that encouraged active travel but also protected pedestrians. TfL was working with boroughs to see how it could support service users on the first and last mile of their journeys, which could include micromobility and ensuring that cycling was expanded to people who were disabled. The opening of the Silvertown Tunnel would also support this work with a cycle-crossing bus.
- 16 Members supported the work and recent campaigns to reduce workplace violence and aggression and the importance of that work for staff, for customers and for TfL's finances as so much of it related to fare evasion. Technology was

being introduced to support this work, including body-worn cameras. They also supported the work to make the transport environment and areas by stations more welcoming as part of the work to end violence against women and girls. This work included partnership work with the Mayor's Office for Policing and Crime to conduct localised women's safety audits, which would be used to inform future work.

- 17 The report included details of TfL colleagues and teams being recognised on a national scale for their work. These included: the Corporate Finance team winning 'Team of the year' at the Corporate Finance Awards; and the Bank Station Capacity Upgrade project for winning awards at the Royal Institution of Chartered Surveyor's National Awards and the National Rail Awards; colleague commendations at the National Highway Awards, with colleagues from Network Management and the Construction Advisory and Innovation Team recognised as finalists; commendations at the National Transport Awards for the marketing campaign promoting the Elizabeth line to Heathrow, and another to credit work on Smart Stations, with MTR Elizabeth Line receiving best rail operator for the second consecutive year, and Richard Baker from MTR winning the Community Champion of the Year award for his truly inspiring work. The Commissioner also commended the 66 colleagues who had been awarded Coronation medals by The King, Queen and Department for Transport.
- 18 On behalf of everyone at TfL, the Commissioner welcomed the Posthumous Lifetime Achievement Award to Alan Benson MBE. Alan was a determined and dogged campaigner who worked to improve transport access for disabled people, including as Chair of Transport for All. He had been a passionate and critical friend to TfL, and the impact of his work was seen across the organisation and network, from step-free access on all Crossrail stations to lift signage.
- 19 TfL was also currently celebrating Black History Month, with the support of its Colleague Network Groups.

**The Board noted the report.**

## **60/10/24 Finance Report — Period 5, 2024/25**

Rachel McLean and Patrick Doig introduced the item, which set out TfL's financial results to the end of Period 5 of 2024/25 (the year-to-date 1 April to 17 August 2024). The report had been discussed in detail at the meeting of the Finance Committee on 9 October 2024.

At the last meeting of the Board on 24 July 2024, it was reported that growth in TfL's passenger numbers was trending below Budget. Although ridership and demand for services continued to grow, it was not at the level expected when the Budget was agreed. The rate of growth had slowed slightly further since Period 2, although September was an important month in the calendar for transport when travel patterns tended to change, so further information would be available shortly on the extent to which these trends would impact the second half of the year and the longer-term.

The trend on passenger demand continued to be the primary focus of TfL's work to understand performance and improve its forecast results this financial year. Journeys to-date were just over two per cent up on last year and built on the nine per cent improvement seen in the previous financial year. However, this was 52 million fewer journeys than Budget, which in turn was driving the financial pressure.

On 16 August 2024, TfL published its Quarterly Performance Report for Quarter 1, which included the latest forecast for the full financial year ahead, with passenger income projected to be £150m lower than Budget. TfL was able to mitigate an element of this pressure, so the operating surplus was forecast to be £100m lower than Budget at £61m for the full financial year. While TfL remained on track to deliver an end of year operating surplus, it was forecast to be lower than budgeted. TfL did not make a profit and every penny of the surplus was immediately committed to invest in assets and services.

TfL had prepared a plan to mitigate the shortfall in income on the cost side. When it began to see a softening of demand compared to Budget, TfL introduced additional soft controls over discretionary expenditure, which it was now strengthening. The 2024/25 Budget already contained considerable savings assumptions, so TfL was looking at areas where, halfway through the year, spending was less than budgeted and it could make further savings.

TfL needed to protect and build on its customer service offer to attract more passengers and build recovery through income. Expenditure on capital renewals was consciously being increased as customer service relied on addressing the backlog of work on asset condition because of years of insufficient capital funding for the network. Enhancements spend was expected to be a little lower than last financial year due to the variation on the contract payment profile with Siemens Mobility Limited.

For the duration of the last Government funding settlement, from August 2022 to March 2024, the amount of usable cash TfL could hold was limited to an average balance below £1.2bn. Since then, average cash balances had been maintained above the minimum requirement and were just over £1.27bn at the end of Period 5, which was slightly lower than Budget mainly due to timing differences of working capital.

TfL had started 2024/25 with a £250m contribution from Government for major capital investment programmes. Positive and constructive discussions on future funding requirements for TfL continued with Government which recognised that, in common with other public transport authorities, support for major investment programmes was essential. TfL continued to make a strong case for a multi-year capital settlement that would enable it to be more efficient and effective in planning and procuring major projects. It was hoped that the outcomes of discussions would be available soon and TfL continued to demonstrate the positive impact that investment in London transport had on growth, jobs, skills and benefits right across the UK.

Periods 1 and 2 saw an average journey growth of 3.6 per cent compared to last year. Average growth in Periods 3 to 5 was lower at around 1.1 per cent. Over the

five Periods in total, journeys were 52 million lower than Budget and passenger revenue was £78m, which was four per cent lower than Budget, although the overall Period 5 total income was only two per cent below Budget. The trends by mode were broadly similar, except for the Elizabeth line journeys which continued to grow at almost 14 per cent higher than last financial year and two million higher than Budget, which flowed through into passenger income. Rail journeys were 2.1 per cent lower than last financial year, with growth on London Overground offset by lower journeys on the DLR and Trams.

On drivers for the trends, the wider economic outlook remained uncertain with mixed signals and TfL was working with the Greater London Authority's (GLA) Economics team to further examine the detail. Income growth and real terms wage growth was positive but real wages remained lower than pre-coronavirus pandemic levels. Younger adults, who used TfL's services more, had lower wage growth especially relative to housing costs and other factors limiting disposable income.

On average, Londoners spent 17 per cent of their income on housing costs, compared to 10 per cent or less in other regions. Housing costs caused more significant hardship at the lower end of the income spectrum. More than one in four Londoners lived in poverty, partly due to the high cost of housing.

The savings ratio had increased since the beginning of 2023, driven in part by higher interest rates and economic uncertainty. This had caused a divergence in the trend of real incomes growth and actual levels of consumption, which flowed through to travel choices. Retail sales volumes and values fell again in June 2024, with an underlying trend of sales volumes reducing. Longer term, high inflation meant consumers were spending more money for fewer goods and services.

TfL's Budget this financial year had assumed that demand would continue to recover from the coronavirus pandemic, albeit at a lower rate, specifically as more commuters returned to the office. Evidence to-date suggested that the rate of growth in office-related travel had decelerated at a slower rate than assumed and was beginning to plateau, suggesting it was close to an equilibrium.

Some service levels continued to perform below TfL's expectations, which was expected to have some impact on levels of demand, particularly on the Central line on London Underground which TfL had plans in place to improve as soon as possible.

Although the revenue forecast for the full financial year was £150m lower than Budget, this remained in a range with a potential upside if trends improved and a potential downside if recent trends continued and growth continued to slow, so cash and contingency measures remained essential.

TfL's marketing initiatives to promote services were focused on increasing ridership and lowering fare evasion. It continued to invest directly where there was a financial payback, such as developing a tool for bus operators to optimise schedules quickly and adapt to changes in service patterns. Other marketing initiatives focused on bus and Hopper fares, which were kept low and offered good value to customers, as well as new services on bus and cycle routes. TfL was working with the GLA to identify other marketing interventions to increase ridership.

TfL was focused on getting the TfL Go app back into operation and the next evolution would be to include payments. It was working to better understand customers and journey habits so marketing could be targeted to nudge customer behaviours. More details and background information on the TfL Go app evolution would be circulated to Board Members. **[Action: Alex Williams]**

**The Board noted the Finance Report.**

### **61/10/24 Report of the meeting of the Safety, Sustainability and Human Resources Panel held on 4 September 2024**

This was the final meeting of the Panel before the changes to the Board membership and decision-making structure took effect on 9 September 2024. As the Chair and Vice Chair of the Panel had left the Board, Panel Member Mark Phillips introduced the item.

The meeting opened with a point of clarification and a sincere apology to the family of Melissa Burr, for the way the circumstances of Melissa's tragic death at Victoria bus station on 10 August 2021 had been described in a previous report. None of the tragic events that took place on that day were in any part due to the fault or actions of Melissa Burr and the report had been corrected. The full clarification and apology was recorded in the report of the meeting and in the minutes of the meeting.

The Panel discussed the London-wide Ultra Low Emission Zone – Six Months Report, which showed the expansion of the scheme had effectively closed the compliance gap between inner and outer London. The Panel commended officers for the positive health benefits that the expansion of the scheme was achieving.

The Enterprise Risk on the attraction, retention, wellbeing and health of employees was discussed, in particular the higher levels of staff turnover in areas that contained critical or scarce skillsets, such as engineering and projects, and mitigations that were being developed and implemented to address the risk.

The Panel also welcomed the significant growth in cycling alongside a reduction in the risk per journey of serious and fatal injuries, which was in part due to the introduction of safer cycling infrastructure.

**The Board noted the report.**

### **62/10/24 Report of the meeting of the Audit and Assurance Committee held on 18 September 2024**

Committee Chair, Mark Phillips, introduced the item.

The Statement of Accounts for the year ending 31 March 2024 were not available for review or approval as the external auditors were closing out some issues, including whether the current cyber incident had any material impact on the 2023/24 financial statements. Government changes in audit reporting meant that the deadline for the publication of accounts had been extended for local authorities to February 2025, which allowed for adequate time.

The Committee discussed and approved the Internal Audit Plan for the second half of 2024/25, and requested flexibility to facilitate any additional audits that might be required as a result of the cyber incident.

Members also noted the overview of performance in processing Freedom of Information and Environmental Information requests in 2023/24, and in 2024/25 from 1 April to 30 August 2024. They commended officers for their continued hard work and high performance.

**The Board noted the report.**

### **63/10/24 Report of the meeting of the Land and Property Committee held on 1 October 2024**

In the absence of the Chair and the Vice Chair, Panel Member Anne McMeel introduced the item.

The Committee noted good progress as set out in the Chief Executive's report. A new Skills Centre in Edgware had opened as a base for local people embarking on careers in construction and the built environment. Places for London, as London's largest landlord for small- and medium-sized enterprises, was working hard to connect the different businesses to support each other.

Places for London had delivered over 1,000 new homes with over another 3,500 in development. The Committee noted the progress with the joint venture development at Bollo Lane and West London.

A preferred bidder had been announced for the joint venture to help deliver electric vehicle charging hubs.

The Committee also discussed the Places for London Enterprise Risks relating to the attraction and retention of its employees and in relation to its stakeholders.

**The Board noted the report.**

### **64/10/24 Report of the meeting of the Customer, Sustainability and Operations Panel held on 2 October 2024**

Panel Chair, Marie Pye, introduced the item. This was the first meeting of the new Panel and sustainability would be a significant part of future agendas.

The Panel discussed progress against TfL's Equity in Motion strategy, and was pleased to see progress with actions achieved already in 2024 and welcomed initiatives such as half price bus and tram travel for care leavers. The Panel would receive regular reports on the strategy.

The Panel also considered the deep-dive on TfL's "Care Score", which was an important measure of customer satisfaction and a source of learning. The Panel was particularly interested in the differences in the scores of occasional and regular users of TfL services.

**The Board noted the report.**

**65/10/24 Report of the meeting of the Programmes and Investment Committee held on 3 October 2024**

Committee Chair, Peter Strachan, introduced the item. He thanked the new Members for their contribution to the meeting, acknowledging the level of pre-reading required for these meetings.

The Committee discussed progress with the Four Lines Modernisation programme and the DLR rolling stock and systems integration programme and considered papers on the Silvertown Tunnel and the Piccadilly line upgrade.

The Committee noted the assurance reports, in particular the work to refine the internal project management processes and it welcomed the papers on lessons learnt from key external reports and from its own major programmes and projects, which demonstrated that TfL was a learning organisation.

**The Board noted the report.**

**66/10/24 Report of the meetings of the Finance Committee held on 19 August and 9 October 2024**

Committee Chair, Anne McMeel, introduced the item.

The additional meeting of the Committee on 19 August 2024 approved Procurement Authority for the DLR Operations and Maintenance Procurement and entry into the Franchise Agreement and ancillary agreements.

In addition to the Finance Report, considered elsewhere on the agenda for this meeting, the Committee discussed Treasury Activities and Prudential Indicators outturn for the previous year at the meeting on 9 October 2024. It also approved contract extensions relating to track protection resources and for cleaning and a contract for the provision of railway services by London Underground, as required under the Public Service Obligations Regulations 2023.

The Committee also discussed the Enterprise Risk on supply chain disruption and ineffective procurement and contract management, which was important given the number and value of contracts and the management of the risk played a key role in driving efficiencies and savings. In relation to the Enterprise Risk on financial resilience, Members noted that TfL was resilient but that there was always more that it could do.

**The Board noted the report.**

**67/10/24 Any Other Business the Chair Considers Urgent**

In addition to meetings and briefings, the Chair encouraged Members to take up opportunities to go on site visits and to report any issues relating to safety.

There was no other urgent business to discuss.

**68/10/24     Date of Next Meeting**

The next scheduled meeting of the Board would be held on Wednesday 4 December 2024 at 10.00am.

The meeting closed at 11.51am.

Chair: \_\_\_\_\_

Date: \_\_\_\_\_



**Board**



**Date:** 4 December 2024

**Item:** **Matters Arising, Actions List and Use of Delegated Authority**

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## **This paper will be considered in public**

### **1 Summary**

- 1.1 This paper informs the Board of any use of Chair's Action or authority delegated by the Board, any Mayoral directions to TfL and progress against actions agreed at previous meetings, since the last meeting of the Board on 16 October 2024.
- 1.2 There has been no use of Chair's Action since the last meeting.
- 1.3 On 27 November 2024, the Audit and Assurance Committee will be asked to exercise the authority delegated by the Board, on 24 July 2024, to approve the Statement of Accounts for the year ended 31 March 2024.
- 1.4 A Mayoral direction was issued to TfL on 16 October 2024 in relation to further financial support fund for Seven Sisters Market traders (MD3299). This has been reported to the Audit and Assurance Committee and will be reported to the Land and Property Committee.
- 1.5 Appendix 1 sets out the progress against actions agreed at previous meetings.

### **2 Recommendation**

- 2.1 **The Board is asked to note the paper and the actions list.**

### **3 Use of Chair's Action**

- 3.1 Under Standing Order 113, in situations of urgency, the Board delegates to each of the Chair, the Deputy Chair and the Chairs of any Committee the exercise of any functions of TfL on its behalf, including the appointment of Members to the Committees and Panels. If the Chair, the Deputy Chair or the Chair of a Committee is unable to exercise authority due to unavailability or a conflict of interests, that authority may be exercised by the Chair or Vice Chair of any Committee. Members will be informed as soon as practicable following any use of Chair's Action using the authority of this standing order and it must be reported to the next ordinary meeting.
- 3.2 There has been no use of Chair's Action since the last meeting.

## **4 Use of Specific Authority Delegated by the Board**

### **Statement of Accounts for the Year Ended 31 March 2024**

- 4.1 On 24 July 2024, the Board approved the Annual Report and authorised the Chief Customer and Strategy Officer to make any further design or editorial changes as may be required. The Board also considered the draft Statement of Accounts, recognising that a decision on the approval could not be made until the resolution of several outstanding matters and delegated approval to the Audit and Assurance Committee.
- 4.2 These issues were resolved and our auditors, Ernst & Young LLP (EY), completed its evaluation of the effects of the cyber security incident on the scope of its work for 2023/24.
- 4.3 On 27 November 2024, the Audit and Assurance Committee will be asked to approve the Statement of Accounts for the year ended 31 March 2024.

## **5 Mayoral Directions to TfL**

- 5.1 The Greater London Authority (GLA) Act 1999 permits the Mayor to issue to TfL general directions as to the manner in which TfL is to exercise its functions or specific directions as to the exercise of its functions (or not to exercise a power specified in the direction). Directions are often issued in relation to the implementation of matters in respect of which the Mayor delegates statutory powers to TfL.
- 5.2 Mayoral decision papers inviting the Mayor to issue a direction set out the financial and other implications. If those implications change over time, that will be reported to the GLA.
- 5.3 All Mayoral decisions are issued in writing, with the information that is not exempt from publication included on the GLA's Decisions Database on its website: <https://www.london.gov.uk/about-us/governance-and-spending/good-governance/decisions?order=DESC>.
- 5.4 Mayoral directions relating to TfL are reported to the Board's Committees for information as soon as possible after they are received by TfL or published. Regular reports will list the relevant directions for as long as they are applicable.
- 5.5 Annually the Audit and Assurance Committee considers the list as part of its consideration of the annual audit plan to ensure that appropriate audit resource is applied to assurance on TfL's work in implementing Mayoral directions. This will also be kept under review at each quarterly meeting of that Committee.
- 5.6 A summary of current Mayoral directions to TfL is maintained on the "How we are governed" page on our website, with links to the relevant Mayoral Decisions: <https://tfl.gov.uk/corporate/about-tfl/how-we-work/how-we-are-governed>

[governed](#). That page will be updated as and when further directions are made.

- 5.7 There has been one Mayoral direction issued to TfL since the last meeting.

**Further Financial Support Fund for Seven Sisters Market traders  
([MD3299](#))**

- 5.8 Seven Sisters Market is an indoor market consisting of 38 traders and plays a vital role in London's Latin American community as a specialist, culturally specific amenity. The market was housed in a TfL owned building that had to close. As the traders were unable to trade, [MD2724](#) directed TfL to provide financial assistance to traders until a temporary market opened at Apex Gardens, as part of the Seven Sisters regeneration project. The developer withdrew from the regeneration project and [MD2868](#) directed TfL to provide further financial support while TfL progressed new plans. [MD3097](#) directed TfL to provide further financial support across all traders as they were unable to trade until a temporary market opened. [MD3097](#) confirmed that TfL had planning permission for a temporary indoor market, which was expected to open in July 2023, and was applying to open a temporary outdoor market in October 2023.
- 5.9 The opening of a temporary market has been delayed due to unforeseen flaws in the fabric of the building, which must be resolved to make the market safe; and is not now expected until 2025. On 16 October 2024, the Mayor directed TfL to make a fourth hardship payment to traders to support them until the temporary market opens.
- 5.10 The Mayoral direction has been reported to the meeting of the Audit and Assurance Committee on 27 November 2024 and will be reported to the meeting of the Land and Property Committee on 10 December 2024.

## **6 Actions List**

- 6.1 Appendix 1 sets out the progress against actions agreed at previous meetings.

### **List of appendices to this report:**

Appendix 1: Actions List

### **List of Background Papers:**

Minutes from previous meetings

Audit and Assurance Committee agenda and papers for the meeting on 27 November 2024

Greater London Authority Decision Making Database

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## Board Actions List (to be reported to the meeting on 4 December 2024)

## Actions from the meeting held on 16 October 2024

Minute No.	Item/Description	Action By	Target Date	Status/Note
58/10/24	<p><b>Matters Arising, Actions List and Use of Delegated Authority: Bus Lane Access for NHS Blood and Transplant Service Vehicles</b></p> <p>In relation to bus lane access for emergency vehicles (Action 43/07/24(1)) officers were asked to check whether access covered the NHS Blood and Transplant service vehicles.</p>	Alex Williams / Claire Mann	-	<b>Completed.</b> From 19 May 2023, all non-blue light, liveried, patient transport vehicles working for London's NHS were permitted to use bus lanes following the positive conclusion of the trial.
60/10/24	<p><b>Finance Report - Period 5, 2024/25: Information on TfL Go App Evolution</b></p> <p>More details and background information on the TfL Go app evolution would be circulated to Board Members.</p>	Alex Williams	July 2025	We continue to consider the development of the app and an update is scheduled for the July 2025 meeting of the Customer, Sustainability and Operations Panel.

## Actions arising from previous meetings

Minute No.	Item/Description	Action By	Target Date	Status/Note
42/07/24 (2)	<p><b>Commissioner's Report: Investment in Public Toilets at Stations</b></p> <p>The Mayor had allocated an additional £3m per annum to invest in refurbishing existing and installing new public toilets at stations and TfL was developing a prioritised investment programme for toilets across the network. The feasibility report would be published shortly and circulated to Board Members. Consideration would also be given to the recent report by the Royal Institute of Public Health on public toilets.</p>	Alex Williams	October 2024	<b>Completed.</b> The report was published on 30 October 2024.

Minute No.	Item/Description	Action By	Target Date	Status/Note
43/07/24 (1)	<p><b>TfL Annual Report and Statement of Accounts for the Year Ended 31 March 2024: Bus Lane Access for Emergency Vehicles</b></p> <p>Consideration would be given to quantifying the economic impact and financial benefit for the emergency services and wider public sector of permitting access to bus lanes for emergency vehicles.</p>	Alex Williams	Ongoing	Emergency service vehicles have access to bus lanes. We are assessing how to quantify any financial benefits.
45/07/24 (2)	<p><b>Annual Update on 2023/24 Delivery of the Mayor's Transport Strategy: Borough Provision of Electric Vehicle Charging</b></p> <p>A delivery report with London Councils was shared with the boroughs last year and TfL would publish a similar report this year. It would also hold some further direct discussions with borough leaders to highlight progress and encourage further provision of electric charging.</p>	Alex Williams	November 2024	<b>Completed.</b> Additional text has been agreed for inclusion in the TfL Annual Report.
30/06/24 (1)	<p><b>Commissioner's Report: Accident Formal Investigation Changes</b></p> <p>Andy Lord had engaged with Dr Lynn Sloman MBE and Mark Phillips on improving TfL's formal investigation processes and would share this work with Peter Strachan, ahead of providing further information to Board Members.</p>	Andy Lord	December 2024	An update on improving TfL's formal investigation processes is being provided to the members of the Safety and Security Panel on 2 December 2024.
30/06/24 (4)	<p><b>Commissioner's Report: Friday Fares Trial Update</b></p> <p>The Friday Fares Trial had ended and the data on ridership and its economic impact was being analysed. An update would be provided to the Board.</p>	Alex Williams	December 2024	A report providing an analysis of the off-peak trial will be published by the end of 2024.
16/03/24 (2)	<p><b>Commissioner's Report: Bus Journey Improvements Information</b></p> <p>TfL monitored the impacts from improvements made to routes and services from bus priority measures, bus lanes and roadworks on bus journey times. More granular detail would be provided to the Customer Service and Operational Performance Panel and consideration would be given to how to better promote the information more widely to the public of the value and the benefits to customers.</p>	Claire Mann / Alex Williams	March 2025	We are collating this information for bus lanes installed in March 2024 and will present the data to the Customer, Sustainability and Operations Panel when complete.

Minute No.	Item/Description	Action By	Target Date	Status/Note
16/03/24 (3)	<p><b>Commissioner's Report: Analysis of Workplace Violence Experiences</b></p> <p>Analysis of the data that TfL held into whether women and Black, Asian or minority ethnic colleagues were more likely to experience workplace violence would be carried out and provided to Board Members.</p>	Siwan Hayward / Claire Mann	-	<p><b>Closed.</b> We do not receive data from the Metropolitan Police Service that is sufficiently granular to assess if the relatively low incidences of workplace violence and aggression that may be due to protected characteristics reflects a higher risk for women or Black, Asian or minority ethnic colleagues, compared to other characteristics. If that level of data becomes available in the future, and there appears to be a link, this will be reported to Members along with the action being taken.</p>
05/02/24 (1)	<p><b>Commissioner's Report: Bus Stations and Stands Review</b></p> <p>TfL was undertaking a review that initially focussed on safety at bus stations that had the busiest interactions. Once the initial review was completed, the option to broaden the review to look at busy bus stands would be considered. The review would also look at the public realm around bus stations and stands and any design issues at specific sites. A more detailed update would be brought to the Safety, Sustainability and Human Resources Panel.</p>	Claire Mann	November 2025	<p><b>Completed.</b> An update is included in the Trends in Safety and Key Improvement Activity paper on the agenda for the 2 December 2024 meeting of the Safety and Security Panel.</p>

Minute No.	Item/Description	Action By	Target Date	Status/Note
05/02/24 (3)	<p><b>Commissioner's Report: Taxi and Private Hire Vehicle Best Practice Guidance</b></p> <p>TfL's initial review of the Department for Transport (DfT) best practice guidance for taxi and private hire vehicle licensing authorities showed that it was aligned with many of the DfT recommendations but there were some which differed to TfL's approach and further consideration was being given to those. TfL was not responsible for the booking platforms which were outside of its regulatory remit but a wider discussion would be brought to the Safety, Sustainability and Human Resources Panel.</p>	Claire Mann	November 2025	<b>Completed.</b> A briefing note has been sent to Members of the Customer, Sustainability and Operations Panel and the Finance Committee on the 'DfT Best Practice Guidance Update', as taxi and private hire issues fall within their remit.
05/02/24 (4)	<p><b>Commissioner's Report: Thamesmead Site Visit</b></p> <p>Board Members would be invited to attend a Thamesmead site visit and talk through the option plans.</p>	Alex Williams / Secretariat	Spring 2025	A site visit will be arranged and all Board Members will be invited.
52/07/23 (3)	<p><b>Safety, Health and Environment Annual Report 2022/23: Capturing Waste Heat</b></p> <p>Members discussed the complex work on capturing waste heat from TfL's services, including London Underground ventilation shafts, to provide a constant and reliable source of energy that could be used for nearby buildings. Market and stakeholder engagement were planned, with a proposition to be launched to the market later in the year. TfL would also have further discussions with the Government on how this work could be scaled up. A paper would be submitted to a future meeting of the Finance Committee.</p>	Lilli Matson	-	<p><b>Closed.</b> TfL's work regarding capturing waste heat and its onward provision to nearby buildings remains ongoing.</p> <p>We had engaged with a specific developer on the delivery of a potential site in Southwark, but it has advised that the site is not economically viable.</p> <p>More broadly, we continue to engage with the Government on the Heat Network Zoning regulations (expected to come into force mid-2025), as well as the</p>



Minute No.	Item/Description	Action By	Target Date	Status/Note
				Greater London Authority on Local Area Energy Planning. They, and other third-party stakeholders, have an interest in TfL's waste heat sources, and we continue to work proactively with them to accelerate roll out using suitable waste heat assets. As project exploration is at an early stage with other organisations and the regulations are not expected until mid-2025 we have closed this action and commit to bringing an update to the Customer, Sustainability and Operations Panel and other Committees and Panels as relevant at the appropriate time.
52/07/23 (4)	<p><b>Safety, Health and Environment Annual Report 2022/23: Benchmarking Environmental Targets</b></p> <p>It was recommended that TfL benchmark its environmental targets for construction and engineering decarbonisation, biodiversity and recycling against the wider industry and consider how it could narrow or close that gap.</p>	Lilli Matson	March 2025	Information will be provided to the meeting of the Customer, Sustainability and Operations Panel.

Minute No.	Item/Description	Action By	Target Date	Status/Note
36/06/23 (5)	<p><b>Commissioner’s Report: Public Transport Credits Scheme</b>  Evidence from the earlier scrappage schemes showed that around one-third of recipients did not purchase a new vehicle. Members would be updated on the uptake of the improved public transport credits scheme in due course.</p>	Alex Williams	Ongoing	<p>From launch on 30 January 2023 to scheme closure on 7 September 2024, there were 875 applications received for scrappage options, which included travel passes. A full review will be available as part of the scrappage scheme evaluation report, to be published in due course.</p>
36/06/23 (8)	<p><b>Commissioner’s Report: Future E-bikes Contracting</b>  TfL was meeting with London Councils to discuss the future contracting of e-bikes and consistent ways of managing the service across the city, which would be reported back to the Customer Service and Operational Performance Panel in due course.</p>	Alex Williams	2025	<p>An update will be provided to the Customer, Sustainability and Operations Panel when there is further clarity around ongoing discussions with stakeholders.</p> <p>On 26 November 2024, TfL set out in a press release its new approach to tackle problematic parking of dockless e-bikes.</p>

**Board**



**Date:** 4 December 2024

**Item:** Commissioner's Report

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**This paper will be considered in public**

## **1 Summary**

1.1 This report provides a review of major issues and developments since the meeting of the Board on 16 October 2024.

## **2 Recommendation**

2.1 **The Board is asked to note the report.**

**List of appendices to this report:**

Appendix 1: Commissioner's Report – December 2024

**List of Background Papers:**

None

**Andy Lord**

**Commissioner**

**Transport for London**

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# Commissioner's report

December 2024

# Contents

3 Introduction

4 Safety and security

15 Our customers

22 Our colleagues

25 Our green future

28 Our finances

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# Introduction

Our work to deliver a safe, inclusive and connected transport network for Londoners

In the period since my last report, we have received confirmation from Government of the capital funding settlement for 2025/26. The level of funding is £485m, inclusive of the £24m previously committed for the additional Elizabeth line trains. This is a good settlement, which enables us to move forward positively and now engage in the longer-term funding discussion as part of the Government's Comprehensive Spending Review. This contrasts with 2024/25 funding, where we received £250m less than we asked. In the context of the national fiscal position, this is a positive outcome.

Our work on addressing the impact of the cyber security incident is ongoing but we are slowly getting back to normal. After pausing new Oyster concessions and photocard applications, we have now brought our concession photocard website back online and started accepting and processing new applications for all photocard concessions. I would like to reiterate my thanks to all of our customers for their patience and our colleagues who have been relentlessly focused on restoring these services. We continue to work with partners to conduct a thorough investigation into the incident.

I was pleased that RMT and ASLEF suspended planned industrial action on the Tube that would have seriously disrupted Londoners. We believe we have made an offer to our trade unions that is fair, affordable, good for our colleagues and good for London - and we urge our trade unions to continue working with us.

I am also delighted to report some key highlights around our performance. The

Elizabeth line had its best performance since the start of services across the line – a direct result of immense efforts from all parties who collectively work together to improve reliability on the line. Separately, our Santander Cycles e-bikes continue to be extremely popular. On 15 October, we had more than 4,900 hires making it the busiest day ever for e-bike hires.

In project news, the first new Piccadilly line train arrived in London in October, a real step forward and insight into what the Piccadilly line upgrade will bring. The first two trains are also being manufactured at Siemens' new facility in Goole in Yorkshire, marking further progress for this exciting project. Separately, we reopened Kingston Cromwell Road bus station on 16 November which now has improved live information screens at both ends of the bus station, new and accessible toilets as well as improved accommodation for our colleagues including bus drivers. The bus station is also an energy-efficient building with a new canopy in the waiting area.

Last month, I had the privilege of representing TfL at events and meetings with key city authorities, stakeholders and international partners. I attended the International Association of Public Transport Conference and Exhibition in Singapore and the Tourist & Transport Forum in Sydney as well as meeting various politicians and dignitaries. In addition to sharing what we do well, it was really interesting to learn from other transport authorities facing similar challenges.

At home, I met with Councillor Kieron Williams, leader of London Borough of Southwark and Chair of London Councils

TEC, as we continue to build close working relationships with London Councils.

Internally, it was an honour to be able to recognise colleagues who played a key role in last year's Coronation of Their Majesties King Charles III and Queen Camilla. At a special event at the London Transport Museum, colleagues received a certificate and commemorative medal on behalf of the Department for Transport and Royal Household as a thank you for their efforts.

As 2024 comes to a close, it is inevitable to reflect on the challenges we have faced but also the great successes we have had this year and the resilience we have shown as an organisation. It is a true privilege to lead this incredible organisation – made up of so many wonderful and dedicated colleagues – and I am looking forward to building on what we have achieved and continuing to deliver for London in 2025.



A handwritten signature in black ink, appearing to read 'Andy Lord', written over a thin horizontal line.

**Andy Lord**  
Commissioner

# Safety and security

Prioritising the safety of our customers and colleagues as they travel around the network

## Notable incidents

This section begins with a summary of the most notable incidents that have occurred since the last report was published. This is followed by updates on elements of our established safety programme that are in place to eliminate all deaths and serious injuries on London's transport network by 2041. Safety is the priority in everything we do, and it is neither inevitable nor acceptable that anyone should be killed or seriously injured when travelling in London.

As noted in the previous editions, we only report limited details about such incidents while matters remain under investigation, pending the outcome of inquests or any regulatory or other legal proceedings.

## Safety incidents on the network

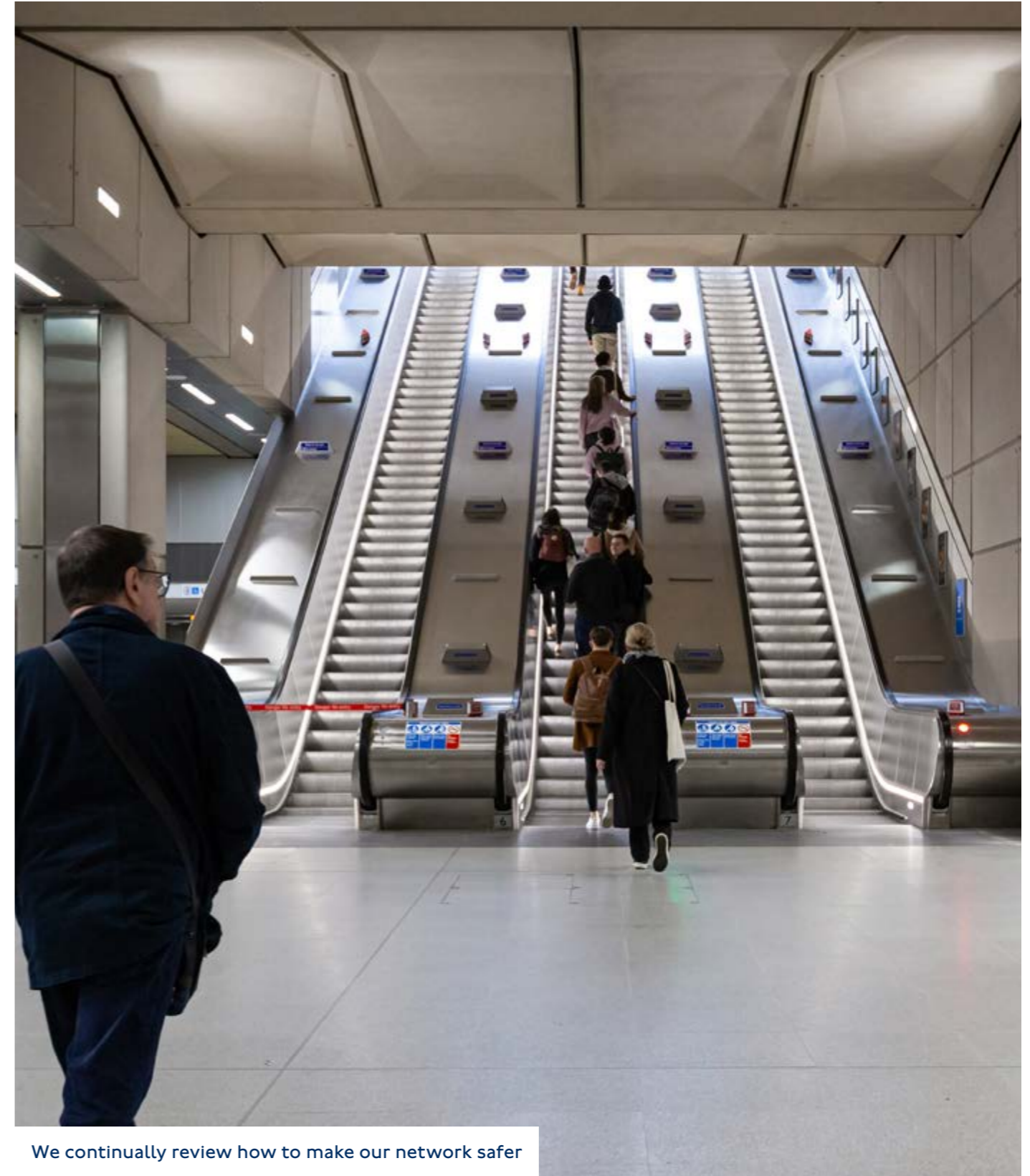
On 24 October, a pedestrian was struck by a bus in Church Lane, Leytonstone. The pedestrian sadly died some days later while in hospital.

On 26 October, a pedestrian was struck by a bus on South Lambeth Road, Stockwell. The pedestrian sadly died some days later in hospital.

On 4 November, a customer was fatally injured at Chalk Farm station and sadly died at the scene.

On 23 November, a cyclist was struck by a bus on Westferry Road, Isle of Dogs and sadly died at the scene.

All of the incidents are under investigation and our thoughts are with the family and friends of the four people who have lost their lives.



We continually review how to make our network safer



### New measures introduced to the Direct Vision Standard

From 28 October, we strengthened the requirements for the world-leading Direct Vision Standard (DVS), which is playing a vital role in helping to save the lives of vulnerable road users in the capital. The DVS measures how much a heavy goods vehicle (HGV) driver can see directly through their cab windows and sets minimum standards to promote visibility and safe driving practices. We are now strengthening the minimum safety requirements for vehicles in the capital to reduce the level of risk that HGVs can pose to all road users, especially people walking and cycling.

HGVs that are more than 12 tonnes will now require a minimum three-star DVS rating or to fit an updated system of enhanced safety features - the Progressive Safe System - to operate in Greater London. Operators will receive a penalty charge notice of up to £550 if they operate an HGV more than 12 tonnes in Greater London without a valid HGV safety permit, or do not meet the permit conditions. We introduced these changes to further enhance the safety standards of HGVs operating in the capital, helping them to reduce road danger for everyone.

The latest data indicates that the DVS continues to contribute to the Mayor's Vision Zero targets. Revised 2023 data shows there was a 49 per cent reduction in the number of fatal collisions involving an HGV, compared to the 2017-19 baseline. Improving vehicle safety features will further reduce the level of risk to all road users. Before it came into force, the upcoming change in requirement was

## Our new Colleague Safety Plan outlines how all staff play a role in making TfL a safe place to work

regularly communicated through a variety of channels, including weekly calls with industry representative groups. We also launched a marketing campaign which was featured across trade press publications, posters in service stations on the north, south, east and west approaches to London, paid search content and service emails to existing permit holders.

An event was held on launch day which was attended by Will Norman, Walking and Cycling Commissioner, among other colleagues and Vision Zero stakeholders, to celebrate the continued success of the scheme and publicly congratulate the freight industry for their commitment to road safety.

### Our new Colleague Safety Plan

On 10 October, we launched our new Colleague Safety Plan. Aimed at all colleagues, it guides us towards our goal to get everyone home safe and healthy every day, and towards our 2030 safety and health ambition that no colleague is killed or seriously injured while at work. People are the beating heart of our organisation, and this plan encourages colleagues to reflect on who they stay safe at work for and drives home the importance of safety.

The plan outlines our accountabilities for safety; signposts our colleagues to the right tools such as our Safety, Health and Environment management system; and promotes a just and fair culture where everybody feels able to speak up, share mistakes and learn from them.

The Colleague Safety Plan outlines the role all staff play in making TfL a safe place to work, and how we all have a responsibility for our own and others' safety, health and wellbeing.

All our senior staff and people leaders are expected to talk to their teams about the plan and make it relatable to everyone's work. To help land the key messages, we have also produced a one-page summary to enable focus on the safety fundamentals and how everyone plays a role in putting safety at the heart of everything we do.



Our Colleague Safety Plan promotes a just and fair culture



Keeping customers and colleagues safe on the network

### Tackling work-related violence and aggression

We are committed to doing all we can to protect our colleagues and keep them safe in the workplace. Eliminating work-related violence and aggression includes how we support those who experience hate crime. There is no place for discrimination and zero tolerance for any form of hate crime on any of our services.

We have launched a new communications campaign encouraging our train operators to report all incidents of work-related violence and aggression and make them aware of the support available for them.

### A new communications campaign encourages our train operators to report all incidents of work-related violence and aggression

In February, a colleague was punched in the face at Earl's Court station by a fare evader. Body-worn cameras captured the incident, and the suspect was identified following checks on their Oyster card. They were charged with common assault and subsequently pleaded guilty. On 16 September, the suspect was sentenced to fines and costs totalling £2,385.

In April, two colleagues were assaulted at Liverpool Street station. One was pushed in the chest, and another struck in the forehead. Evidence was captured on body-worn camera. The suspect was arrested by the British Transport Police and charged with common assault. They entered a plea of not guilty but were found guilty following a trial and sentenced to fines and costs totalling £2,090.

### Personal Security Summit

In collaboration with London TravelWatch, on 22 November we held a Personal Security Summit. The first of its kind, the event brought together the policing and transport industries, and Equality, Diversity and Inclusion stakeholders, to discuss personal security on transport in London, with the aim of encouraging wider transport industry collaboration and action.

It helped raise awareness of the work being done by transport and policing partners to improve personal security, as well as our understanding of the key and intersecting issues that drivers, stakeholders and community groups are facing with personal security on London's transport network.

### Crime and antisocial behaviour on public transport

Tackling robbery continues to be a focus for our policing partners. Operation Surge is the Metropolitan Police Service (MPS) response to robbery on the bus network. Around 80 per cent of bus-related robberies happen at bus stops. Victims are often young people under the age of 18. The Roads and Transport Policing Command deploys high-visibility patrols to the highest-risk locations. Since 8 October, Operation Surge resulted in 106 arrests and 160 stop and searches.



The British Transport Police's Operation Invert is a similar operation on the rail network, with high-visibility patrols deployed across identified stations and lines. For the month of October, the operation resulted in 38 arrests and 152 stop-and-searches.

As part of our work with the MPS to tackle crime at bus stops we installed and trialled the use of specially designed CCTV cameras at bus shelters in London. The trial seeks to explore the benefits of CCTV for preventing crime and antisocial behaviour, as well as for investigating incidents, thereby improving customer confidence to travel on the bus network. The trial started on 25 November 2024 and will run for one year.

An initial six-month technology test took place earlier this year, where we installed CCTV at five bus shelter locations in partnership with the MPS. We are now planning to install CCTV at four bus shelters at Cambridge Park by George Green, Walthamstow Market, Morning Lane and Whitechapel.

In addition to assessing the effectiveness of CCTV for crime prevention and investigation, we will gather feedback from customers and stakeholders throughout the trial to assess the impact of CCTV on how they feel about safety and security when using our bus network.

#### **Tackling violence against women and girls**

We continue our work to tackle violence against women and girls on the public transport network and improve their confidence to travel. Project Guardian continues to be an essential part of our work to help raise awareness of how to be an active bystander and tackle sexual harassment as a community. After exceeding our target of delivering sessions to 28,000 students in financial year 2023/24, we are on track to exceed our target again in 2024/25. To help promote the active bystander initiative we use a variety of communication methods, including wallet-sized leaflets and posters for students, which encourage them to be an active bystander and report incidents.

#### **White Ribbon Day**

We became a White Ribbon accredited organisation in February 2022, and I am proud to be a White Ribbon Ambassador. We continue to deliver our programme of work to foster a positive and safe organisational culture by putting systems in place to both educate and create a hostile environment for violence against women and girls. This year, we celebrated our third year of White Ribbon accreditation by supporting both customers and staff to make the promise to never stay silent about male violence against women.

### **We celebrated our third year of White Ribbon accreditation by supporting customers and staff to never stay silent about male violence**

White Ribbon reminds us that while not all men are perpetrators, all men have the power and responsibility to stop violence against women and girls. This can be achieved through everyday actions, calling out inappropriate behaviour, and advocating for policy changes that enhance protection and support, such as our Domestic Abuse Policy.

Between 25 November and 9 December, in support of the International Day for Elimination of Violence Against Women and Girls and 16 days of Activism against Gender-Based Violence, Piccadilly and Northern line trains and trams display a white ribbon.

#### **Stamping out hate crime**

National Hate Crime Awareness Week started on 13 October, a campaign we have been supporting for the last 10 years. We ran an internal communications campaign highlighting what constitutes a hate crime and dispelling myths around reporting, as well as emphasising the importance of wearing and activating body-worn cameras and reporting every incident internally and

to the police. We held hate crime insight sessions for our colleagues to help gain understanding but also to enable them to relay their views and concerns. The feedback from these sessions meant we could improve our guidance for colleagues by explicitly outlining the support they will receive if they are a victim or witness of hate crime.

We collaborated with our policing partners to support the awareness week, arranging events at King's Cross, Euston, Finsbury Park, Whitechapel, Mile End, Tottenham Court Road and Leicester Square stations. At these, we encouraged people to report any experiences or witnesses of hostility.

We also worked with the Muslim Council of Britain and Community Security Trust to support engagement and raise awareness within communities in places of worship.

As part of our work to help encourage active bystander intervention, we again teamed up with the charity Protection Approaches to offer hundreds of places on active bystander training. The interactive three-hour course empowers people to take action to prevent or reduce harm when they encounter hate crime.

### Safeguarding our vulnerable customers

Safeguarding our most vulnerable customers remains our ongoing priority. Suicides on our network remain consistent with trends for the last two years and we continue to employ expertise within local boroughs and charities to increase awareness of mental health support and reduce the number of suicides in London.

We recognise our colleagues who intervene and support people in crisis daily. As a result of their continued commitment to preventing suicides and saving lives, from October to November we awarded five colleagues with a lifesaving award representing two life-saving interventions.

As part of our commitment to ensure our colleagues have the right tools and support to identify and care for the most vulnerable individuals using our services, during October and November we hosted seven suicide prevention courses, which upskilled 125 colleagues.

As well as engaging with and providing toolkits for our colleagues, we also continue to develop our partnership with Thrive London who support us in creating positive mental health messaging across our network. This includes increasing awareness about their 20-minute suicide awareness training. The training is a short, free, online course aimed at anyone aged 16 and over who want to know what to do if they are ever in a situation where someone they know or see may be struggling with thoughts of suicide. More than 4,000 Londoners have already completed the training.

We recently engaged with Network Rail, National Highways and the London boroughs suicide prevention groups to support us in building a consistent London-wide approach to suicide prevention. The groups include community groups, NHS representatives, local councils and charitable organisations, and the aim is to share best practice, support ongoing projects and escalate any areas of concern – by working together we can have a greater impact in reducing suicides.

World Mental Health Day was on 10 October and the national theme this year was workplace mental health. We ran a stall for colleagues at our Palestra office building to share materials, chat over a brew and signpost colleagues to various charities or in-house services.

### Supporting rough sleepers

Helping rough sleepers get the support they need is a safeguarding priority for us. We work closely with outreach services, Greater London Authority (GLA) partners, community charities and local authorities to understand how best to support those sleeping rough in London and on the transport network.

On 10 October, to promote World Homeless Day, we worked with the charity Next Meal. We provided information on their services at a number of our stations, including Liverpool Street, St John's Wood, Highbury & Islington and Angel. The aim was to raise awareness of the homelessness support centres across London and to help those in need find their next meal.

Also, to mark the event together with Arriva Rail London, we partnered with national homeless charity Crisis. On the day, the

money made from customers who brought hot drinks at cafes at Camden Road, Gospel Oak, Hackney Central, Highbury & Islington and Shepherd's Bush London Overground stations was donated to Crisis. More than £6,000 was raised in total.

### Complying with the Equality Act

We continue to prioritise the safety and security of our most vulnerable customers by ensuring taxi and private hire vehicle drivers are meeting their obligations under the Equality Act 2010 regarding passengers with disabilities. Between October and December, we conducted an Equality Act Day, a proactive operation carried out with the assistance of a person with a guide dog to test the compliance of drivers and vehicles booked through a number of different platforms.

A total of six drivers were tested throughout the day and all were found to be compliant and knowledgeable of their obligations under the Act. This was nonetheless an excellent opportunity for the team to engage with drivers and have those important conversations around making our transport network accessible to everyone.

### Revenue protection

Our intelligence-led enforcement focuses on fare evasion through contactless payments, which is increasingly the most used method of paying on the network. This is a priority within our analytical and tactical response to reducing fare evasion. Enforcement teams are conducting more checks on customers on board services and inside stations to check whether those using contactless have paid for their travel

correctly. On the Elizabeth line there has been a 200 per cent increase in the number of contactless payments checks

Our in-house investigation team supports efforts by investigating those who deliberately avoid paying for all or part of their journey. In October, the team worked in collaboration with our Counter-fraud and Corruption team to investigate five individuals for fraudulently obtaining concessionary travel passes. Through proactive interventions we were able to apprehend the individuals at an early stage. The cases will now be reviewed by our Investigation, Appeals and Prosecutions team.

We seek solutions within technology and partnerships that can support us in reducing fare evasion and are working closely with both the Rail Delivery Group and the Department for Transport to explore options to verify barcode tickets at stations that also serve National Rail services. We have undertaken trials using new technology on both the Elizabeth line and the Tube to inform a long-term approach to barcode ticketing on our network.

**We work closely with outreach services, GLA partners, community charities and local authorities to understand how best to support those sleeping rough**

### Judicial reviews

We agreed a settlement of a judicial review claim brought by a number of haulage companies based in the Netherlands against TfL, which sought to challenge the lawfulness of penalty charge notices issued to drivers working for those companies. Any financial remedies arising out of the claim have not been agreed and are subject to further directions from the court.

The London Borough of Tower Hamlets has issued a claim for judicial review against us seeking to challenge a decision not to release further funding under its Local Implementation Plan. We have agreed terms for the claim to be withdrawn that are subject to approval by the court.

### Vision Zero

#### 20mph programme and marketing campaigns

We continue to introduce 20mph speed limits and now have these in place on a total of 264km of our roads.

In July, August and September, we re-installed 20mph banners mounted on lamp columns situated on roads that had installed the new speed limit in March 2024 to help maintain driver awareness. The banners have been used on our road network since 2016, having previously been used by boroughs to support their transition to borough-wide 20mph speed limits. They are repeated at intervals to encourage safer speeds on these corridors. The banners will remain in place for six to nine months before being re-installed on other 20mph corridors to enhance driver awareness of the speed limit.

Our digital marketing and radio advertising campaign supporting the speed limit changes continues to perform strongly. A total of 8.3 million individual users were informed of the campaign at least once in the first half of 2024/25, generating more than 9,000 visits directly to our Safe speeds webpage. The campaign went live again for two weeks starting on 14 October and is due to be repeated on 2 December.

Interim data from February 2023 shows that since 20mph schemes were introduced on key roads in London, the number of collisions reduced by 25 per cent, and collisions resulting in death or serious injury have reduced by 25 per cent. We are commissioning new independent research on the impact of Phase I of the programme, introducing a 20mph speed limit on the remainder of our roads in central London. The analysis will focus on before and after comparisons of personal injury collision data and vehicle speeds, as well as bus journey times, walking and cycling levels and customer perception surveys. We plan to publish the report in the spring.

#### Complementary speed-reducing features

Work is taking place to identify where complementary speed-reducing features such as green infrastructure, lane reallocation and raised crossing points can be installed to provide a self-enforcing speed limit where it has recently been introduced. This is in line with the Department for Transport's guidance on setting speed limits, which was published originally in August 2006 and last updated in March 2024.

### Safe streets

Design and construction work is continuing on more than 40 schemes at various locations across London where we have identified road safety concerns.

Public engagement on several schemes is planned from around November until March 2025; these include improving a pedestrian crossing on the A2 Deptford Broadway and a speed limit reduction scheme on the A21 Hastings Road/A232 Croydon Road in Bromley.

16 October saw the closure of a consultation on a proposal to introduce a permanent traffic order banning the right turn from the A21 into Sevenoaks Road (Old London Road) in the London Borough of Bromley. This would replace the existing emergency traffic order introduced in May 2023, which expires in November 2024. The banned turn remains in place for safety reasons following fatal collisions at the junction in 2020 and 2022, while further traffic modelling takes place for a scheme to add signals to the junction. Results of the modelling are due shortly and subject to the outcome of the consultation, construction is planned in 2025/26.

#### Safer Junctions programme

The Battersea Bridge Safer Junction scheme started on 30 October, and will continue until late September 2025. Construction is starting on the south side of the river at the junction of Battersea Bridge Road and Cambridge Road and will work its way north towards the bridge in phases, one junction at a time, to minimise disruption on the network.

In our Vision Zero progress report published in 2021, we set ourselves a target to complete public engagement on 10 Safer Junction locations by the end of 2024. We are on track to meet this target, having completed engagement at nine locations, with the 10th public consultation on Cannon Street/King William Street (Monument junction) due to start on 9 December.

Construction work continues on the Lambeth Bridge scheme, which will deliver safety improvements at the Millbank/Lambeth Bridge/Horseferry Road Safer Junction location.

Design and outcome planning work continues on the remaining junctions covered by the programme, with detailed design planned at the junction of A503 and Woodberry Grove, Hogarth Roundabout and Monument junction in 2025/26.

### Bus safety

#### Bus safety programme

Our bus safety programme continuously drives major safety improvements across our network. The programme is structured around five key pillars; safe speeds, safe streets, safe vehicles, safe behaviour and post-collision response.

As part of the safe vehicles pillar, we are continuing to roll out the Bus Safety Standard as new buses enter the fleet. There are now 1,690 buses meeting either the 2019 or 2021 Bus Safety Standard requirements. The first buses that meet the 2024 requirements with the new design for the front of buses are entering



We continue to improve safety standards on our buses

service. Testing of advanced emergency braking is planned for the winter and our retrofit programme continues, with 3,465 buses retrofitted to date with Bus Safety Standard technologies.

We are developing the next phase of the Bus Safety Standard to cover new requirements for 2027, 2030 and 2033. We are working with bus manufacturers on potential measures, and using roadshows to gather bus driver feedback, driver collision restraints, passenger high back seats and alcohol interlocks.

We continue to develop solutions to better understand and address pedal application error. Research by Dr Lisa Dorn at Cranfield University on the psychology behind this is complete and will be published by the end of the year.

We have engaged with more than 100 drivers as part of work to look at pedal standardisation. The initial findings have been presented to bus manufacturers and a report on the options and recommendations to take forward is being drafted. To date, a total of 3,600 buses have been fitted with pedal cameras.

As part of our fatigue, health and wellbeing workstream, we worked with bus operators to update their fatigue risk management plans, which has included providing workshops for operators. The fatigue detection technology trial is ongoing with 352 buses fitted to date. We expect to install the technology in 417 vehicles which is lower than our original target of 500.

As part of an innovation challenge, we are trialling a range of interventions to reduce bus customer injuries. This includes an upstairs seat counter display, with early market engagement now complete.

We are also researching slips, trips and falls with the help of behavioural science specialists SoMoCo, as well as buggy falls with the help of AECOM.

#### Walthamstow bus station

On 8 November, Walthamstow bus station was closed for an estimated six weeks for essential works to improve pedestrian safety and accessibility. This includes converting the temporary signals that have been in place since May to a permanent solution; shortening the crossing distance at pedestrian crossings; providing new lighting and CCTV; updating the carriageway, road markings and signage; and installing Sustainable urban Drainage Systems (SuDS).

These works are in response to a Notice of Contravention issued on 28 March 2024 to TfL by the Health and Safety Executive (HSE) following its investigation into the tragic death of a pedestrian at Walthamstow bus station on 15 December 2023.

To minimise disruption to customers, other renewal works will also be taking place during the closure of the bus station that include resurfacing the carriageway, as well as Thames Water installing a new mains connection.

We have conducted a review of bus station layouts and arrangements at bus stations that we operate; this is a commitment that was made to the HSE in March 2023 in response to a Notice of Contravention following the incident at Victoria bus station in August 2021. An annualised programme is now in place and five targeted interventions are planned this financial year with design work under way to develop a prioritised programme of projects for future years.

### Safe and Healthy Streets

The Safe and Healthy Streets programme has entered its seventh year of delivery and continues to progress ambitious improvements to London's streets that help people walk, cycle and travel by public transport more safely and conveniently. The programme is an important delivery channel for actions set out in the Mayor's Transport Strategy and our Vision Zero action plan, Cycling action plan 2, Walking action plan, and the Bus action plan. Progress has continued throughout the autumn, including the completion of 3,500 SuDS at the former Joe Strummer underpass, and an ambitious project to introduce signalised pedestrian crossings on all arms of the roundabout at London Road in Richmond.

The programme remains on track to deliver 25km of new bus lanes across the road network by March 2025, with 12km constructed to date. As well as improving bus passenger journey times, bus lanes also help taxis and blue light services move around the network and reduce risks to cyclists.

Borough partner delivery results for 2023/24 were collated and finalised in October, with 162 new school streets introduced in 23 boroughs last financial year alongside 43 new pedestrian crossings, 21km of cycle network and more than 34,000 square metres of sustainable urban drainage. A total of 14 boroughs have introduced new speed reduction measures, and 18 now have 20mph borough-wide road networks, reducing both the risk and severity of collisions across London.

### Motorcycle and moped training courses

We offer two free motorcycling training courses for those who live, work or study in London, delivered by our training partners. Beyond Compulsory Basic Training comprises of a one-day classroom and an on-road course designed for delivery riders who have already completed the compulsory training. It focuses on riding in busy urban areas and making deliveries, covering topics like safely loading a motorcycle, riding with loads and using satnavs. This financial year, 133 riders have completed the Beyond training course.

We also provide one-to-one motorcycle training designed to improve rider attitudes, increase skills and reduce risk taking. These free, two hour sessions are tailored to the individual rider, who can pick the route, what they want to learn and the start time/date. So far, 670 riders have completed the programme this financial year.

Since the start of both courses, more than 8,000 riders have benefited. Every year 1,000 riders are trained on one of these motorcycle courses.

### 2023 Casualties in Greater London report

At the end of September, we published our 2023 Annual Casualties in Greater London report. This showed that when comparing 2023 data with the 2010-14 baseline, fatalities have reduced by 30 per cent (from 136 to 95) in London compared to seven per cent for the rest of Great Britain (from 1,663 to 1,550), and serious injuries have decreased by 24 per cent (from 4,734 to 3,615), compared to a 13 per cent decrease (from 28,007 to 24,383) respectively. However, 95 people were tragically killed on London's roads, with devastating consequences for the families, friends and communities impacted by these deaths and life-changing injuries.

Last year was also the lowest year on record for fatalities in the capital, excluding 2021, which was heavily affected by coronavirus pandemic-related lockdowns and changes in travel patterns. This marks important progress towards the Mayor's Vision Zero goal of eliminating death and serious injury from London's streets by 2041.

The publication also provides us with valuable insights around risk factors for our various road users. The risk of a motorcyclist being killed on London's roads is now less than half of what it was compared to the 2010-2014 baseline period (from 0.40 to 0.18 per million journeys), and the number of people killed while cycling has also fallen by 40 per cent against the 2010-14 baseline, from 13 to eight. These insights further demonstrate our progress towards the Vision Zero goal.

Urgent action is still needed, and we remain committed to working closely with London's boroughs, the police and other partners to carry out the work needed to reduce danger on London's roads for everyone.

### Police activity to support Vision Zero

Between 28 October and 10 November, we ran a number of National Policing Chiefs Constabulary (NPCC) road safety campaigns called Operation Dark Nights. The objectives were to increase pedestrian visibility at night, improve road safety for horse riders, reduce collisions involving pedestrians and horse riders, and increase awareness of safety regulations for cyclists. During this operation a total of 1,647 Traffic Offence Reports were issued, including 95 for seatbelts; 129 for mobile phone use; 203 for excess speed; and 1,492 for other traffic offences. A total of 289 vehicles were also seized during this period, with 160 arrests made for 234 offences, which included 53 for drink and drug driving.

November was a busy month for our policing partners who supported three NPCC campaigns including Operation Drive Insured to ensure our policing partners were able to identify vehicles that were not insured through automatic number plate readers.

There were several tactics deployed where 523 traffic offence reports were issued, with 168 of those for no insurance. A total of 150 vehicles were seized and 52 arrests made. The police also supported RoadPeace Remembrance Day on 17 November, an important moment for



We are lowering the speed limit to 20mph on more of London's roads

reflection, solidarity and advocacy. The day brings together bereaved families, local communities and professionals to honour road crash victims and call for urgent action to prevent future tragedies.

BRAKE Road Safety Week took place between 18 November and 24 November. This year's theme was After the Crash.

### Security

#### Cyber security incident

On 31 August TfL was subject to a sophisticated cyber security incident, resulting in the need to reduce access to the network and systems to minimise and contain the threat. The incident did not disrupt our core operations, with the exception of a short disruption to Dial-a-Ride services due to interruptions in being able to take bookings.

We have worked closely with the National Crime Agency (NCA) and the National Cyber Security Centre (NCSC) throughout this process and have also notified the Information Commissioner's Office. We are continuing to work with the NCA and NCSC to conduct a thorough investigation into the incident and the NCA has confirmed that one arrest has been made to date. Partners (including the NCSC, NCA and Microsoft) have stated their view that we responded well to the incident and disrupted the attack to some extent, potentially preventing a far worse outcome.

Our investigations identified that some limited customer data had been accessed. We contacted around 5,000 customers whose bank account details were accessed as a precautionary measure to offer them support and guidance.

While our core operations were disrupted minimally, we suspended our system for photocard applications, which we know has affected customers who have not been able to take the benefit of concessionary rates of travel to which they were entitled. We are now accepting new applications for all concession photocards. We are beginning to work through refund requests and are working in a priority order, starting with the oldest cases. We are also, and will continue to, identify exceptional cases from vulnerable customers and those citing hardship and/or high value refunds so that we can resolve those as quickly as possible. We understand that the disruption to refunds and issuance of concessionary cards has caused difficulties to our customers and apologise for this. We are working hard to resolve the backlog.

Given the nature and scale of the cyber incident, an independent review will be conducted to consider the circumstances surrounding the incident and the impact, our response to the incident, and whether further improvements are needed to our cyber security strategy, taking into consideration existing initiatives that are in



progress. As the cyber incident is ongoing and the subject of a criminal investigation by the NCA, the review may be undertaken in phases. The review will be overseen by members of our Board.

We are continuing to recover from the cyber incident and restore all systems in a secure and managed way and there continue to be temporary impacts to some customers. We have kept customers informed throughout and continue to do so. We know that other organisations are keen to learn from our experience and, with the NCA and NCSC, we will provide appropriate briefings on our response and lessons learnt in due course.

#### **Oyster photocard open for students, care leavers and apprentices**

Our concession photocard website was made temporarily unavailable on 1 September. As part of the measures implemented to deal with the cyber incident, we took the difficult decision to temporarily pause new concession photocard applications while we undertook important security checks.

While work continues to restore services, we have now safely brought back online the concession photocard website and started processing new applications. As of 4 November, new applications for 18+ Student, 18-25 Care Leaver and Apprentice

Oyster photocard were being accepted. Applications for 60+ were reopened on 12 November. Applications for 5-10, 11-15 and 16+ Zip photocard reopened throughout November. Customers needing to apply for a Freedom Pass can continue to do so via London Councils.

Once customers have successfully applied for a new photocard, we will advise them on how to claim for any additional travel costs incurred while the photocard website has been unavailable. We, alongside train operating companies across London, continue to accept expired 5-10 and 11-15 Zip Oyster photocard where they are normally valid, in light of the cyber security incident until 31 December 2024, giving expired Zip photocard holders plenty of time to apply for their new concession photocard. Parents and guardians of those with expired Zip photocard have been emailed, and posters in our stations updated. We have also informed bus drivers and gate line staff of this change.

#### **Driver and operator licensing**

On 14 October we issued a cyber security incident notice updating licensees on the impact on the cyber security incident on driver and operator licensing. The notice (a regulatory update) reassured licensees that there was no evidence that their data or the licensing system had been compromised, but that as a result of necessary measures to safeguard our systems, our processes are taking longer than normal.



Our photocard website is now safely back online

## World Cities Day

In 2013, the United Nations General Assembly decided to designate 31 October as an annual day of observance aimed at promoting cooperation among countries in addressing the challenges of urbanisation and sustainable development. On World Cities Day this year, the World Health Organization published a report detailing how cities can advance efforts to address the rising challenges of noncommunicable diseases and injuries. With urbanisation on the rise, the role of cities in safeguarding health and wellbeing is more crucial than ever, and the report draws on the first ever set of indicators designed specifically for use in helping recognise the important role cities can play in protecting people from key risk factors.

Between 2021 and 2023 the indicators were piloted in 20 cities from a range of settings, including London, with the aim of providing a data baseline and to trial data collection methodology. In collaboration with the GLA Public Health team we collated data for our submission. We were extremely pleased to see how positively London was reflected. Out of the 34 indicators, London scored 'advanced' (the most desirable outcome) for 19 and 'developing' (the median) for 15. This reflects the extensive work that has been undertaken in London to monitor, prevent and treat noncommunicable diseases and injuries.



Safeguarding health and wellbeing for all Londoners

# Our customers

Maintaining and optimising our services to improve the customer experience

Page 39

## Network report

### London Overground

We continue to work with Arriva Rail London and Network Rail to improve performance on the Mildmay line. The challenges are the result of poor asset reliability, particularly between Willesden Junction and Richmond. The Camden Stabilisation plan is under way to address key asset performance on the Richmond branch. Network Rail successfully delivered the Chingford and Watford to Euston/ Lioness line blockades which has improved assets on the Weaver and Lioness lines.

### Elizabeth line

Progress continues on improving the reliability of the Class 345 trains, with the impact of faults notably reduced compared

to earlier in the year. Work continues with National Rail Western to facilitate improvements through their Project Brunel programme. Recent work has focused on improving track conditions, with extra access for National Rail engineers on evenings and weekends to resolve long-standing issues. These initiatives should lead to higher reliability going forward. We already seeing the results, as during Period 8 (13 October to 9 November), the Elizabeth line had its best performance since the start of services across the line.

### Trams

We are working closely with Alstom and other key suppliers to agree on the reliability improvements by sourcing key spare components that are approaching

obsolescence. This will improve overall availability and in turn improve performance and reliability.

### Road network

As we moved into autumn we saw an increased number of burst water and gas mains across London. We have long established relationships with the major utilities companies, which enables us to work on highly effective plans to ensure the network can be cleared as quickly as possible. Our operations teams host regular meetings to discuss street performance with key stakeholders and will be working closely with them during what may be a challenging winter to ensure people can move freely around London's network.

Between July and October, one of a series of safety critical projects was completed on the A40 Westway. This work involved replacing four joints on the slip roads to the Westway roundabout, necessitating several road closures in and around this major arterial route for London. To minimise disruption, the work was scheduled only on weekends, with the A40 Westway closed in one direction at a time. A travel demand management campaign was implemented to mitigate further impacts on Londoners, successfully encouraging drivers to use alternative routes. This campaign included paid marketing channels, reaching more than 100,000 daily road users.

Similar measures are under way to support Londoners as a new series of weekend closures on the A40 began in November and will continue until summer 2025.



Supporting sustainable journeys by public transport

We have worked closely with Cadent on the closure of Farringdon in mid-November, in preparation for their next phase of works on Bridge Street in 2025. The Thames Water mains replacement works on the A24 are ahead of schedule, enabling us to make further programme changes to support the delivery of the important bus scheme on the A23.

### Improving our toilet provision

On 30 October, we published a report called 'Improving our toilet provision', which identifies opportunities to increase and upgrade our existing toilet provision across our network. Access to reliable toilets is an essential service for many customers and a vital enabler to travelling, especially for older customers, people with disabilities and those with young children, which is why this study formed part of Equity in Motion; our plan to enable more Londoners to travel safely, accessibly and spontaneously.

In January this year, the Mayor announced that additional funding of £3m each year would be allocated to improving toilet facilities on our network. Since this announcement, we have taken our feasibility findings and assessed the options available to deliver maximum benefit to customers. The report sets out our long-

**Improving our toilet provision is essential to enable more Londoners to travel safely, accessibly and spontaneously**

term plans to address where there are a lack of facilities and improve both toilet accessibility and availability. It also sets out how the funding will be split between creating new facilities, enhancing existing ones, and improving cleanliness.

In addition to the report publication, we hosted a launch event on 30 October at White Hart Lane station, with political and accessibility stakeholders in attendance. Speakers included Deputy Mayor for Transport, Seb Dance, Director of Customer, Emma Strain, and stakeholders including Caroline Russell AM, Haringey Council Deputy Leader Sarah Williams and John McGeachy of Age Concern London. Following the announcement, we were also interviewed by BBC London and on The Politics Show about our commitments.

### Events and protests

Throughout the period we have seen a significant number of protests and marches. We are actively involved in the London Partnership meetings and are working closely with London agencies, in particular the MPS, to understand routes and possible mitigations to ensure we can provide our transport services. We successfully delivered three full capacity NFL games that took place at Tottenham Hotspur Stadium and Wembley Stadium. There were international football matches for both men and women at Wembley Stadium, and the Autumn Rugby Internationals at Twickenham Stadium. The beginning of November was particularly busy with the traditional Guy Fawkes fireworks displays across London, the City of London's Lord Mayor's Show on 9 November followed by Remembrance Sunday events across London. We also supported a number of key religious events during the period such as

Nagar Kirtan in the Southall area and Diwali in central London and Neasden. Winter Wonderland opened on 21 November at Hyde Park, which saw good attendance due to its popularity.

To deliver these events successfully and showcase what London has to offer, we continue to work collaboratively and reactively as an organisation, as well as with all organisers and external partners such as London boroughs, event organisers and venues, policing partners and Network Rail.

### Weather

Our adverse weather plans and procedures cover all operational areas. These enable our teams to implement their plans with staff and the supply chain to respond to and mitigate the impacts of adverse

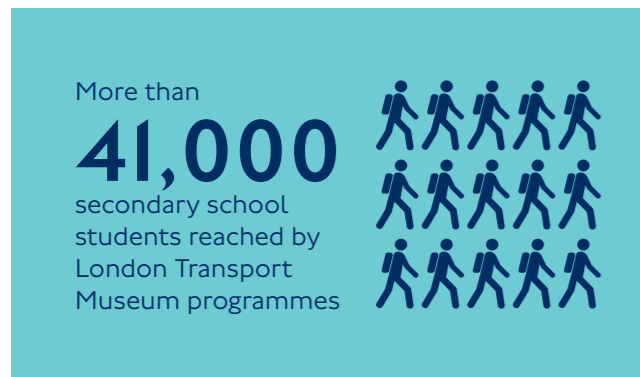
weather. We closely monitor our daily five-day look-ahead forecasts which have defined triggers for temperature, snow, rain, wind and lightning. As we move into the colder months, our teams have worked hard to ensure the transport network remains resilient, including preparation and mitigation against seasonal challenges, ensuring pre-winter maintenance has been completed and there is a sufficient stock of salt and de-icer for snow and icy weather.

### Promoting safe and sustainable travel

London Transport Museum promotes active, safe, responsible and sustainable travel to young Londoners each year. In the last academic year ending July 2024, the museum's dedicated teams visited 1,994 primary schools and engaged with 102,048 year six pupils. In that same year



Encouraging young people to travel safely and sustainably



knowledgeable and passionate staff delivered 801 sessions at secondary schools reaching around 41,876 students. That is an impressive reach of 80 per cent of all our programmes, which include Travel for Life, Citizens and Pioneers, and Project Guardian across all London schools.

To help young people make better travel decisions we partnered with London's borough officers to ensure more than 1,300 schools were accredited as part of the Travel for Life programme in the last academic year. As the nights draw in during the autumn term, London Transport Museum continues to take on the challenge of inspiring school children to travel safely and sustainably and having an impact on young lives.

### London Overground line naming

The signage for the newly named London Overground lines began to be unveiled from 20 November, making it easier for customers to navigate the network. A phased approach is being taken due to the number of maps, diagrams and information systems to update. To support this, we have continued our summer engagement programme at pace over the past few months. On 23 October the sixth and final episode of the Mind the

Gap podcast was released, looking at the Weaver line. It interviewed three women with a connection to the textile trade and design, and explored the history of textile production in east London as well as how the woollen moquette fabric used to upholster Tubes and buses is designed.

In November, we launched a marketing campaign to celebrate the stories behind the line names. This was seen at stations, via outdoor posters and on social media. We are also rolling out the new line names and colours for London Overground across all digital channels, including the TfL Go app. We announced the winners of our community competition for the Liberty line, where locals were asked to nominate three people who had gone above and beyond for the local community. We also partnered with the Women's Super League to promote the Lioness line, which saw star Lioness players doing station announcements at three of our stations on 16 November.

### Industrial action

Industrial action planned for November, which had the potential to cause significant disruption across the Tube network, was suspended. This positive outcome reflects the ongoing constructive dialogue with our trade unions, demonstrating our shared commitment to finding shared solutions.

### Pay talks

As part of our commitment to providing a fair and attractive pay offer, we are currently engaged in three separate pay negotiations for the 2024 pay award in TfL, London Underground and Rail for London Infrastructure. We are pleased that the trade unions representing Rail for London Infrastructure have accepted our pay offer. This positive outcome is a testament to the

collaborative discussions that have taken place. In TfL and London Underground, discussions continue as the trade unions consider our best offer.

### Licensing and regulation

#### 2024 taxi fares review consultation

On 21 October we launched our annual consultation on taxi (black cab) fares and tariffs. It will be open until 2 December and this year looks at whether there should be any increase to the minimum fare or taxi tariffs, as well as the additional charge that was recently introduced for when passengers are dropped off or picked up from Heathrow Airport. After considering the responses, if changes to fares and tariffs are approved, the changes would be implemented in April 2025.

#### Uber London Limited

Uber London Limited's private hire operator licence was due to expire on 27 September. On 20 September, after careful consideration of its application for renewal, we confirmed our decision to grant a new private hire operator's licence to Uber London Limited for a period of 30 months from 27 September 2024, with a number of conditions attached to the licence.

#### Regulation of pedicabs

The Pedicabs (London) Act 2024 (the Act) received Royal Assent on 25 April. The Act provides us with powers to regulate pedicabs in public places in Greater London. Before making regulations under the Act, we are required to consult with who we think appropriate. We are considering how we might regulate pedicabs to ensure safety standards are met, providing certainty as to fares, and preventing antisocial behaviour. We continue to engage with a number of stakeholders ahead of a

public consultation in early 2025. Feedback from the consultation will help shape the new regulatory framework and will enable us to confirm a timetable for its introduction and implementation.

### Projects

#### Old Street roundabout transformation

We have completed the transformation of Old Street roundabout and station to help make sustainable journeys by public transport or active travel easier and safer. This includes creating a new road layout and peninsula as well as safer walking and cycling routes and new station entrances. Works at Old Street have been ongoing since 2019, and this October marked the completion of the project. We ran a communications campaign that supported this huge milestone including posters on the network that targeted cyclists and customers of the station, digital adverts and stakeholder communications.

#### New Piccadilly line trains

We have received our first new Piccadilly line train in London ahead of a period of intensive testing later this year. The first two production trains are currently being manufactured at Siemens' new Goole facility in Yorkshire. The trains are part of a £2.9bn investment to modernise the Piccadilly line and help it run more reliably, safely, inclusively and sustainably.

To support the introduction of the new trains, essential work continues to take place across the Piccadilly line, most recently at Caledonian Road station. The scale of the upgrade means that further closures will take place on the line to support the enabling work required for the new trains to be introduced from late 2025.

### New DLR timetable

To reduce the impact of the speed restrictions put in place after a review of the signalling system in preparation for the introduction of a new modern fleet of trains, we introduced a new timetable in November. It restores the direct peak hour services between Stratford and Lewisham and maintains the rest of the current DLR timetable. Some services that previously terminated at Canning Town have been extended to Stratford International. Services returned to broadly the same levels as before, which means only a small increase in journey times for some customers. We are working hard to bring the new trains into service safely and as quickly as possible.

### Silvertown Tunnel

The final stages of construction and testing commissioning on the Silvertown Tunnel continues at both the Greenwich and Silvertown sites. We have completed integration testing of tunnel and road highway works and continue testing and commissioning work as well as the design and development of the cycle shuttle bus with the help of Stagecoach.

We have assessed the response to a public consultation this summer on our proposals for the opening user charge levels as well as discounts and exemptions. A separate paper is provided elsewhere on the agenda for this meeting with proposals for approval by the Board.

### Cycleway 50

Cycleway 50 is an experimental cycleway on our road network between Holloway Road (A1) and Finsbury Park station. The scheme was delivered in temporary materials to assess the safety, user experience, cycling benefits and impacts to wider road users and businesses.

As part of the public engagement, we commissioned an all-inclusive cycling assessment to learn how someone using an adapted bicycle and cargo bike might experience the route and whether any aspects of the design would exclude them.

The assessment revealed the comfort afforded by protected cycling and good signage in reducing the stress when cycling in a busy location. Some aspects of the design and some behavioural issues from other road users, notably inconsiderate parking and loading, and litter build-ups, could pose a barrier to people using non-standard bikes. These matters will be addressed as part of our decision on whether to retain, change or remove the experimental scheme next year.



New Cycleway 50 is an experimental cycleway

**Other modes**

**IFS Cloud Cable Car**

We hosted a number of events including a Halloween experience with customers completing a spooky scavenger hunt and mask making. The cable car also supported Remembrance Day with 10 cabins wrapped in a bespoke poppy design.

We also launched a campaign to support the Christmas period on 25 November, including promotion of a ticketed

Christmas event on the cable car. The campaign will run until late December, including social media advertising, digital posters and marketing emails.

**Santander Cycles**

The Santander Cycles e-bikes continue to be extremely popular, with more than three hires per bike each day, and more than 1.5 million hires overall. More than 4,900 hires took place on 15 October making it the busiest day yet for e-bike hires.

The scheme offers students and recent graduates a 25 per cent discount on an annual subscription to encourage the habit of cycling at a younger age. September saw the best ever month for redemptions of the student concession with 750 subscriptions, a more than 100 per cent increase year-on-year. The success can be attributed to attending fresher fairs and contacting London Universities with digital tool kits for them to promote Santander Cycles to their students.

Residents on low income can access unlimited 60-minute hires of the bikes for £5 per month. London boroughs promoted the offers to selected residents and at food banks in each borough that are located near docking stations. The aim of the trial is to encourage people who do not typically cycle to start cycling. We worked with boroughs to deliver promotional codes and promote the benefits of cycling. To date, there have been 128 redemptions of the monthly code.

In October we finished the roll out of the additional e-bikes, bringing the total fleet to 2,000. E-bikes are our most popular bikes and enable customers to arrive faster, feel fresher and go further distances, making cycling more appealing and accessible. To celebrate this key improvement milestone, we featured it as a message in our Purpose marketing campaign and promoted it through our marketing campaign from 17 October. Activity included digital posters, social media, emails to registered Santander Cycles users, a press release, engagement with boroughs and stakeholders, Metro features and website updates.

**E-scooter rental trial**

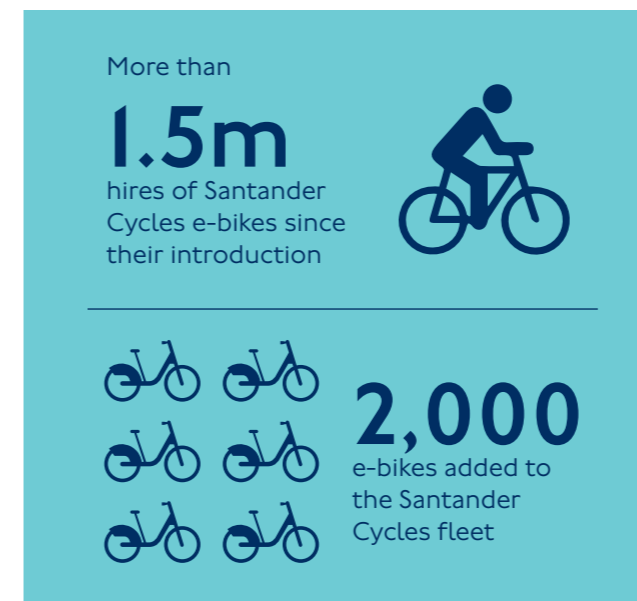
Our e-scooter rental trial has been operating for three years, with 10 boroughs taking part and around 4,500 e-scooters available for hire across 1,000 parking bays. For the period ending 18 November, 148,000 trips were made, taking this to a total of 4.6 million trips. The average e-scooter trip duration is 15 minutes and the average distance travelled is 2.3km. As part of the second phase of the trial we are gathering further data to inform policy on rental e-scooters and trialling innovations such as artificial intelligence to improve parking compliance.

**New approach for dockless e-bike and e-scooter parking**

In November, we set out a new enforcement policy for dockless rental e-bike and e-scooter parking on our red routes on the road network. The new enforcement, alongside significant investment in new parking spaces, will help to ensure that schemes can continue to operate while ensuring streets remain accessible to everyone. The approach will predominantly affect dockless e-bikes, as



Celebrating Halloween at the IFS Cloud Cable Car



London's e-scooter trial already requires parking in bays with controls in place to ensure compliance. Dockless rental e-bikes and e-scooters are an important part of the transport network, helping people get around sustainably and connecting them to other transport modes. However, poor parking of the vehicles can cause significant safety issues for many Londoners, particularly disabled and older people, and these issues have been exacerbated by recent increases in fleet sizes.

We are also investing £1m in additional parking spaces for dockless rental bikes and e-scooters to enable more people to use the schemes safely. We plan to deliver at least 800 vehicle spaces by next summer and create a network of 3,000 spaces by the end of 2026. The new enforcement policy, alongside investment in safe and appropriate parking, will help these services operate in a way that protects the rights of all Londoners to use and enjoy the capital's streets. This action is a response to the issues caused by dockless rental schemes, but we continue to encourage the Government to address these issues in the longer term through new powers for strategic transport authorities to regulate and manage these services.

#### Delivering our Bus action plan

Our Bus action plan was published in March 2022, and set out our five priorities for the bus network to achieve by 2030: inclusive customer experience, safety and security, journey times, connectivity, and decarbonisation and climate change resilience. We have made significant strides in achieving the ambitions within it.



We have completed more than 650 new Routemaster mid-life refurbishments, which includes fitting new priority moquette seating. We aim to have more than 700 completed by the end of the financial year.

We have finished the first new toilet facilities for drivers at Morden station, with seven more sites expected to follow this financial year. We continue to move towards our target of 7,000 bus drivers receiving our Equality, Diversity and Inclusion training by March 2025.

We have 1,700 zero-emission buses running in London, the largest zero-emission fleet in western Europe.

#### HS2 Euston link funding announced in autumn budget

In the autumn budget announced on 30 October, the Chancellor Rachel Reeves confirmed that government funding would be provided for the High Speed 2 (HS2) railway to go to Euston. As part of the commitment to the tunnel between Old Oak Common and Euston station and restarting formal work on Euston station, we are engaging with HS2 and The Euston Partnership (TEP) to review a range of options for transport under the Spatial Integration Plan.

We expect design work to begin again next year, with further push from the government on affordability and scope challenge. We are also exploring affordable solutions that still enable us deliver safe and accessible transport and that supports HS2 and the development at Euston.

#### New Hidden London family tours

Children aged 10 years and over can now go on London Transport Museum's Hidden London tours, where previously only children over 14 years could attend. For the first time, during October half term, families were able to join tours of Clapham South's deep level shelter, secret parts of Euston Tube station, and the disused platforms of Holborn station. A new location, Dover Street was also unveiled as the programme continued to expand.



Opening up Hidden London tours to younger children

#### Partnership with HMS Belfast

In November, we partnered with the Imperial War Museums' HMS Belfast to offer customers two-for-one entry if they travel there on our network. The offer is valid from 11 November until March 2025.

Built in 1936, HMS Belfast is an iconic London landmark, permanently moored on the River Thames. A veteran warship, it is the only remaining British Navy warship from D-Day. With nine decks to explore, visitors can hear stories of life onboard from the crew who called it home, take a seat in the captain's chair and delve into the armoured heart of the ship.

With many of us looking for new experiences to have with family and friends, this offer is a great way of enjoying



one of the city's cultural gems and unique attractions for less. We also offer customers discounts at attractions across the capital including with Historic Royal Palaces, Kew Gardens, the Old Royal Naval College and Merlin Attractions.

### Customer experience

#### Kingston Cromwell Road bus station reopens after transformation

The new state-of-the-art Cromwell Road bus station in Kingston re-opened on 16 November. The station underwent

a redesign aimed at improving safety, sustainability, accessibility and the overall customer experience. The brand-new bus station therefore plays an important role in making bus journeys in Kingston more convenient and attractive.

Work to redevelop the bus station started last summer and customers are now able to benefit from improved real-time travel information screens and accessible toilets. Safety improvements include enhanced LED lighting and CCTV in and

around the station, a wider passenger island with more space for customers waiting and moving around the bus station and a new public announcement system. There are also improved welfare facilities for bus drivers and other colleagues, as well as a new retail unit.

It is now an energy-efficient building with a new canopy in the waiting area. The pavements have also been resurfaced and drainage improved with the installation of 1,600 square meters of SuDS.

The changes to Cromwell Road bus station are part of our Bus action plan to make London's bus network safer and better, improving the customer experience throughout each journey and enabling more people to use sustainable modes of transport. The station will serve a total of 32 bus routes, including Superloop service SL7, several night buses and a school and university bus.

#### Connected London

We continue to roll out high-speed 4G and 5G mobile coverage on our network, enabling customers to stay connected as they travel around London, even below ground. We are working with our supplier to deliver this coverage across the whole of the London Underground, DLR and Elizabeth line, and between Highbury & Islington and New Cross stations on the London Overground. All four mobile network operators – Three UK, EE, Vodafone and Virgin Media O2 – are taking part in the roll out.

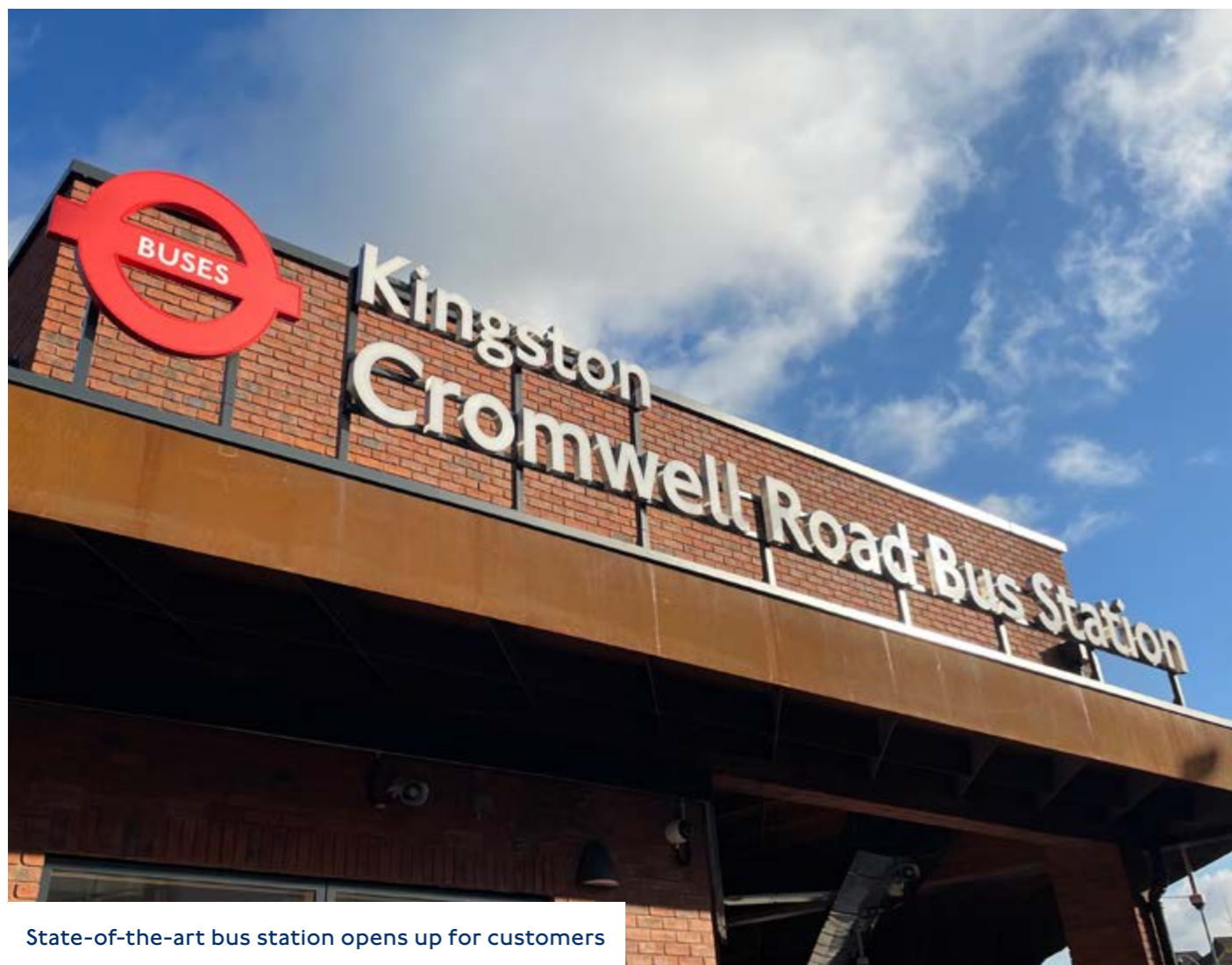
We now have coverage in 36 per cent of stations and 28 per cent of underground tunnel sections. We will complete the full coverage of stations and tunnel sections on the Elizabeth line by the end of November. We will also be starting coverage on the Bakerloo line and the southern end of the Northern line by the end of the year, as well as further tunnel sections in Zone 1.

#### International events

In November, I was delighted to represent TfL at the International Transport Congress and Exhibition in Singapore, together with a number of colleagues. The event was organised by the International Association of Public Transport (UITP), the non-profit member-led organisation for public transport authorities, networks and operators, which champions sustainability and safety in the urban mobility realm.

Later that month, I joined the Tourist & Transport Forum Australia in Sydney and met key stakeholders from the industry and government.

We hugely value the opportunities that such events present, for us to both share our knowledge and understanding of the key issues affecting London and the UK, and learn from equivalent bodies overseas, while encouraging investment in TfL too.



State-of-the-art bus station opens up for customers

# Our colleagues

Making TfL a great place to work, where our people feel supported and empowered

## Building Skills for the Future

On 9 September we welcomed 271 graduates, apprentices and interns after selecting them from more than 1,000 candidates who attended our 77 assessment centres.

Our demographic data this year indicates that we exceed the London 'economically active' percentage for all protected characteristics apart from women for our graduates and apprentices, and disability for just our apprentices. However, overall, there is a positive trajectory.



Of our new apprentices, more than 50 per cent are Black, Asian or minority ethnic, as well as more than 60 per cent of our new graduates. This year, women account for 28 per cent of our apprentices and 38 per cent of our graduates. In addition, the percentage of graduates declaring a disability has increased by eight per cent for 2024.

A detailed summary of the demographic data of this year's graduate and apprentice intake was provided to the meeting of the People and Remuneration Committee on 20 November.

## Steps into Work and Activate programmes

In September, we welcomed 24 new starters into the Steps into Work programme, which offers valuable work experience and employability skills training to people who are neurodivergent.

In November, we welcomed 16 participants of the Activate programme. This 12-week programme offers people with little to no work experience the opportunity to develop the personal and professional skills needed to enter employment.

## King's Coronation medal event

On 15 October, it was a privilege to join Claire Mann, Chief Operating Officer, and welcome colleagues to a special event at London Transport Museum to recognise the remarkable role they played in last year's Coronation of His Majesty The King and Queen Camilla.

From the complex logistical planning to supporting the huge numbers of visitors to the city, our people stepped-up to deliver on this historic day when the eyes



Recognition for our work for the Coronation

of the world were focused on the capital. They went above and beyond to ensure everything ran smoothly, keeping the network moving and delivering world class customer service under great pressure.

In total, 68 of our colleagues received a certificate and commemorative coronation medal on behalf of the Department for Transport as a thank you gift from the Royal Household and the nation to honour them for making this monumental event happen.

#### **You Matter Awards**

On 21 November, we held our annual You Matter Awards ceremony. Now in their third year, these awards are a golden opportunity to celebrate champions from across the organisation who have steered us closer to achieving our vision. They are also a chance for colleagues to recognise their peers and show appreciation for their efforts.

A total of 315 nominations were received across 14 individual and team awards, all aligned to our Vision, Values and strategic themes. Once again, the event included the hugely popular Lifetime Achievement award and People's Choice award categories, the winner of the latter determined by colleagues.

This fantastic event again showcased the immense volume and variety of important work we deliver across our organisation and the enthusiasm and commitment of our hard-working colleagues. It was a delight to be involved in the judging process and attend the evening; a huge congratulations to all the nominees.

#### **Public Finance Awards**

A number of our teams and individuals were shortlisted for the Public Finance Awards. The ceremony was held on 26 November and the nominees include:

- Finance Team of the Year Councils and Local Services – GLA SME prompt payment working group - Graeme King, Katherine Adams, Shoba Varghese and Alex Coatalen (the working group includes TfL, GLA and Bloomberg Associates)
- Finance Team of the Year Councils and Local Services – all our finance teams were shortlisted as a collective
- Public Finance Future Leader of the Year - Olivia Beasley, Senior Finance Business Partner
- Public Finance Leader of the Year - Patrick Doig, Group Finance Director
- Outstanding contribution to Promoting Diversity and Inclusion - Sonia Khan, Principal Advisor, CFO Office
- Excellence in Governance, Reporting and Assurance - Group Financial Accounting and Tax team
- Delivering Sustainability and Social Value - Bus Finance Business Partnering team

#### **Elizabeth line wins big**

The Elizabeth line won the Stirling prize at the highly prestigious Royal Institute of British Architects awards for architecture and the design of an inclusive and cohesive

transport system. This is one of the most prestigious architectural awards in the UK and is a great testament to all who have worked on this great addition to our network.

#### **Vision and values scoops award**

Our internal vision and values campaign won best Employee Engagement/Internal Communications at the PRCA awards in November, which are seen as the ultimate celebration of outstanding work, creativity and talent within the public relations industry and demonstrates the ability of our teams to deliver real results and make a difference in the world.

This campaign focused on sharing and celebrating inspiring stories from colleagues across the organisation that embody our values of being caring, open and adaptable. The stories encourage us all to live these values everyday and fulfill our vision of being a strong, green heartbeat for London.

#### **Menopause in the workplace hub session**

On 30 November, I joined the Menopause in the Workplace session as a male ally, hosted by our Women's Colleague Network Group, where participants discussed the experiences of menopausal colleagues, the support provided at TfL and the important role male allies can play in normalising this stage of life, which affects more than half the population. Over and above what we offer as an organisation, there is so much that we can do as individuals to support colleagues, partners and loved ones by actively engaging in conversations.

Panellists took the opportunity to draw attention to how we should actively create opportunities to talk about the menopause, our menopause hub and e-learning training. This has been developed to raise awareness of sensitive ways to manage menopause in the workplace, help managers to have caring conversations and highlight workplace adjustments to put in place if needed.

The menopause affects everyone's emotional and physical health differently, but educating ourselves about and acting on the needs of those experiencing it will improve the quality of working life for millions. Creating an environment where we can all thrive in our roles means we all win – and we are doing that by listening and being willing to learn, as well as speaking up and actively supporting.

#### **Senior leadership event**

It is important for senior leaders to meet regularly to focus on the strategic direction of our organisation, and in October we hosted an event designed to inform, inspire and motivate the team around the opportunities and challenges we face. As London's strategic transport authority, our remit is vast and varied and demands exceptional leadership and strategic vision to ensure we are effectively guiding our teams to achieve our objectives and deliver everything that we need to for our city, both in the short and long-term.

The event featured keynote speaker, Jamil Qureshi, an expert in high performing teams and behavioural change. He inspired leaders to think differently and lead their people to

fulfil their potential and deliver outstanding results while not only navigating the relentless changes of modern working life but embracing them and using them as a springboard for innovation.

Our leaders also heard directly from colleagues across our business at a series of TED Talk style discussions. Each told powerful stories of how they connect their day-to-day roles to our Vision and Values, bringing these to life in meaningful ways. I am particularly grateful to these colleagues for taking the time to attend and share their personal thoughts and insights.

**Supporting the Royal British Legion**

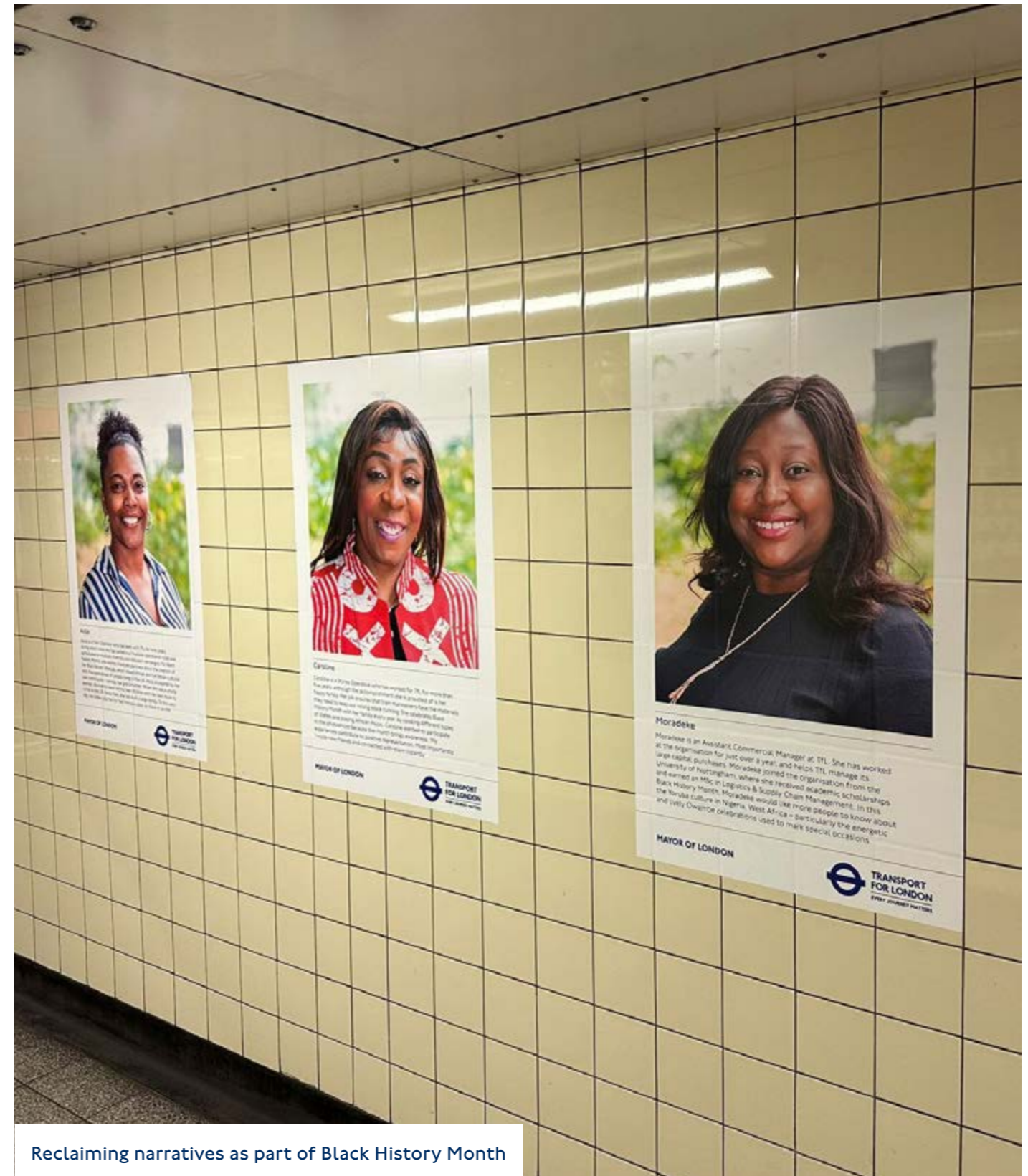
To support the Royal British Legion and their Poppy Day collections, we displayed poppies at stations across the Underground, London Overground and bus network with poppy branding featuring on the front of Tube, Tram, DLR, and Elizabeth line trains. In addition, five buses were wrapped. We also supported the collections across 35 of our stations, raising more than £374,000. Staff came together to raise more than £30,000 through the sales of specially designed pin badges, taking our cumulative total to more than £300,000 since 2014.

**People and Places programme**

To commemorate Black History Month, a display of portraits of our colleagues from our Raising Awareness of Culture and Ethnicity Colleague Network Group went on display at Victoria and Brixton stations. This year’s theme was ‘Reclaiming Narratives’ and our colleagues shared the narratives they thought deserved more attention, as well as their own personal stories.

In October, the final series of Poems on the Underground was launched on our network. Among the six poems featured were two by participants in Foyle’s Young Poets of the Year competition – Anglerfish by Arthur Lawson and Epilogue by Dawn Sands. Poems on the Underground has been running for nearly 40 years and continues to delight customers and colleagues.

Inter Faith Week took place from 10 to 17 November, and members of the Faith Colleague Network Group volunteered to participate in a portrait project. Colleagues who follow faith traditions including Hinduism, Jainism, Judaism, Christianity and Islam talked about the ways their faiths provide support and meaning in their lives.



Reclaiming narratives as part of Black History Month

# Our green future

## Reducing our carbon emissions and investing in London's future

### Solar private wire

On 31 October we released our solar private wire tender, under which we will appoint a delivery partner to link solar energy directly to our network. As one of the largest single electricity consumers in the UK with a use of approximately 1.6 terra-watt hours per year, we seek every opportunity to source renewable energy and ultimately run our operations using 100 per cent renewable electricity.

We aim to connect to new solar photovoltaic projects on sites to locations close to our network, which may not necessarily be on our own estate. This significantly widens the scale of potential solar sources far beyond what is currently available on our own rooftops and land.

Procuring renewable energy in this way means we would bypass the National Grid and significantly reduce our carbon emissions. The scheme has the potential to deliver up to 64 megawatts of electricity per year, which is around five per cent of the electricity needed to run the Tube network. Our current plan is to appoint a delivery partner to a single supplier framework in early 2026.

### Building decarbonisation

In November, we completed feasibility studies for a further 11 of our operational estate buildings that are part of our building decarbonisation programme. This work has been undertaken in partnership with Arcadis, who are providing technical support in developing the second tranche of feasibility studies. In parallel, we have continued to work with Arup, our existing partner for the development of the first tranche of feasibility studies, on six of our

buildings, to add more detailed assessment of carbon saving options to early-stage Phase 3 Low Carbon Skills Fund reports.

The two sets of feasibility studies, combined with the first package of work with Arcadis, means we have now completed building decarbonisation feasibility studies for 44 buildings across our operational estate. We have improved our understanding of decarbonising different types of buildings by looking at their associated cost, carbon and programme impacts. The findings have enabled the team to conduct prioritisation exercises for which buildings we should focus on progressing first to further design and delivery stages.

We also continue to progress building decarbonisation projects that were previously awarded Public Sector Decarbonisation Scheme funding at Therapia Lane Tram Depot, Neasden Depot and Finchley Central Signal Depot. Plans for the decarbonisation at the selected buildings include measures to remove the reliance on life expired gas heating assets by replacing boilers with air source heat pumps, as well as energy saving installations including LED lighting, solar panels and improved insulation.

### Electric vehicle infrastructure and delivery

London's electric vehicle charging network continues to grow with almost 22,000 public charge points as of 2 October, including 1,230 rapid charge points. We continue to provide rapid and ultra-rapid charge points on our road network, in addition to the 300 rapid charge points we have already delivered. New sites are now operational in Sutton, Lewisham

and Bromley and delivery continues at more sites in Richmond, Sutton and Hammersmith & Fulham. We expect to award a new contract before the end of the calendar year to build more charge points.

On 25 September, Places for London announced Fastned as its preferred partner for developing ultra-rapid charging hubs. The joint venture aims to deliver new off-street urban charging hubs that can simultaneously charge multiple vehicles. Each site has the potential to provide a minimum of six ultra-rapid charging bays. An update was included in the Chief Executive's report to the Land and Property Committee meeting held on 1 October. Places for London is in the process of formalising the joint venture and associated corporate structures, with the first site expected to be delivered from 2026. A further update will be provided to the Land and Property Committee on 10 December.

 **22,000**  
public charge  
points available

 **1,230**  
rapid charge  
points available

## ULEZ

We are currently producing the London-wide Ultra Low Emission Zone (ULEZ) One Year Report that will provide an even more comprehensive analysis of the air quality impact of the expansion, following on from the interim analysis presented in the Six Month Report published in July 2024. The report will be published in early 2025 and will be supported by an independent advisory group of experts.

Work has also begun on the ULEZ scrappage scheme evaluation report, following on from the closure of the scheme to new applicants on 8 September. The report will evaluate the uptake of the scheme by vehicle type and grant option, the usage of the grant, travel behaviour changes as a result of taking part in the scheme and perceptions of the scheme. It will also assess the impact and perceptions of the ULEZ support offers. The report will be published in spring 2025. To date, more than 500 vehicles have been accepted for donation to Ukraine through the scrappage scheme, with donated vehicles regularly being transported to the country.

## Climate change adaptation Improving sustainable drainage on our network

We are supporting London to tackle the impacts of flooding from surface water by installing Sustainable urban Drainage Systems (SuDS) across our network. SuDS reduce flooding risk by slowing and reducing the amount of rainwater that reaches the drainage networks, and can include rain gardens, permeable paving and green roofs. They are a key part of our Adaptation Plan's aim to make our capital more resilient to the effects of extreme weather, while also supporting biodiversity.

## By installing SuDS we aim to make our capital more resilient to the effects of extreme weather events

On 17 October we announced that the Marylebone Flyover rain gardens are now ready for rainfall after the final plants went into the ground, thanks to the children in Christ Church Bentinck School's eco club. Drainage has been installed underneath the road surface at the site of a disused subway system, and the ramps and stairs have been transformed into porous rain gardens, able to capture rainfall from approximately 3,500 square metres of catchment. The gardens have been planted with a variety of trees, shrubs and flowers that have been curated to support pollinating insects, while thriving in the local climate with minimal maintenance.

With a target to create a minimum of 5,000 square metres of additional catchment draining into SuDS per year, in alignment with the Mayor's Transport Strategy this project has made a significant contribution to this target being achieved for 2024/25.

## Carbon Literacy Action Day

Our Carbon Literacy training course, developed in partnership with and accredited by The Carbon Literacy Project, has now been completed by more than 5,400 colleagues. This November, we took part in Carbon Literacy Action Day which focused on the theme of Climate Inclusion. We used this opportunity to consider

how we can support our colleagues who regularly work shift patterns outside of regular office hours. For example, we considered providing sessions with different formats and timings to empower them to identify opportunities in their work to help reduce our environmental impact.

## Zero-emission buses

There are now more than 1,700 zero-emission electric buses operating across the capital, making up around 19 per cent of the fleet. Decarbonising the bus fleet plays a crucial role in the journey to net-zero and we are helping to meet the Mayor of London's target for London to be a net-zero city by 2030.

We launched our first end-to-end electric bus 'opportunity charging' trial on route 358 in Bromley, one of our longest bus routes. Pantograph charging infrastructure is built at either end of the route at Orpington and Crystal Palace. This enables the new electric tram-style buses to top up on charge at the end of each journey. The first of their type in London, the new single-deck buses have enhanced customer and safety features and can travel further with the help of electric charging throughout the day.

As London makes up around a third to half of all new bus orders in the UK in any given year, we are encouraging the bus market to explore innovative green technologies, leading to more jobs in manufacturing and supply chains across the country.



Our new electric tram-style buses on route 358



Wildflower verges improve biodiversity and store carbon

#### **Transport award for wildflower verges**

Our Network Management and Resilience team has won the prize at the National Couriers Awards for wildflower verges on our road network. We pledged last year to double biodiversity, and the wildflower verges have doubled to the equivalent of 37 football pitches, which is more than 260,000 metres squared. When wildflowers thrive, it supports pollinators and also ensures that more carbon can be stored in the soil. Over the summer, volunteers from the charity Butterfly Conservation surveyed and spotted an impressive 400 butterflies comprising 21 different species.

#### **Polychlorinated biphenyls non-compliance penalty notice**

On 7 October 2019, we received a compliance notice from the Environment Agency requiring the removal of all equipment containing polychlorinated biphenyls (PCBs) on the London Underground network by the end of 2023. PCBs on our network were safely contained within electrical components not accessible to the public and had not escaped into the environment. We made good progress in complying with the notice, however, due to a number of issues which were outside of our control, including the coronavirus pandemic, we were unable to remove and replace all PCBs by that date. We have continually updated the

Environment Agency with our progress in removing PCBs from the network, including where there were risks to completion. At the end of 2023 we confirmed to the Environment Agency that the remaining PCBs would be removed from the London Underground network by the end of 2024, and that undertaking was completed on 21 November 2024.

On 10 October 2024, the Environment Agency issued a fine to London Underground of £150,000 for not completing the removal of all PCBs by the end of 2023 as required by the compliance notice, which has been paid. The Environment Agency has acknowledged the mitigating circumstances which delayed the PCB removal programme and our extensive actions throughout the removal programme to ensure the London Underground network is free from PCBs when deciding on the level of fine.

#### **Cycleways autumn campaign**

Between 2 October and 17 November, we ran our autumn campaign involving six localised campaigns promoting 11 new, upgraded and extended cycleways. These targeted campaigns aimed to promote the benefits of better connected, safer and easier cycling infrastructure in the local area, for those living, working and travelling through the respective boroughs.

# Our finances

Working to ensure financial stability for the long term

## Financial performance to end of Period 7, 2024/25 (12 October 2024)

### Capital funding settlement for 2025/26

In a letter to the Mayor from the Secretary of State for Transport on 30 October 2024, the Government confirmed £485m in funding for our capital programme in 2025/26, inclusive of the £24m of funding for the procurement of additional Elizabeth line trains committed by the previous government.

Similar to other transport authorities across the world, we cannot fund major enhancements alone, so we were extremely grateful to secure this vital government capital funding for 2025/26 - almost twice the level received for 2024/25.

With this funding and the business rates retention provided by the Mayor, we can continue to deliver for London and for the country. Our plan will support new jobs, homes and economic growth, and will deliver new trains on the Piccadilly line and Elizabeth line, both of which will provide additional capacity, improve reliability and secure skilled jobs in Derby and Goole in East Yorkshire, where they are being manufactured.

We are now able to continue to progress plans for replacing rolling stock on the Bakerloo line and the 20-year-old tram fleet in south London, as well as continuing work on the proposed DLR extension to Thamesmead. However, we will only be able to move these projects into delivery,

and enter into contracts with the UK-wide supply chain, if there is the certainty of a long-term capital funding settlement. That is why we continue to work collaboratively with the Mayor and Government to secure a new long-term capital funding settlement as part of the Government's Spending Review, which will conclude in late spring 2025.

Our latest financial report covers up to the end of Period 7 2024/25 (12 October 2024).

We delivered an operating surplus in 2023/24, reinvesting this in maintaining and improving our network. Our 2024/25 Budget builds on this foundation, aiming to increase our ability to invest by continuing to deliver on our financial strategy:

### Grow and diversify our revenue

- Cumulative journey growth in the year to date is 1.6 per cent, slightly down from the two per cent reported in Period 5. In our budget we were targeting six per cent year-on-year journey growth over the full year, on top of the nine per cent we saw in 2023/24
- Despite growth on last year, journeys are 74 million lower than Budget with passenger income £111m lower than Budget
- Our latest forecast is for passenger income to be £300m up on last year, but £188m lower than Budget

### Deliver recurring cost savings

- Total operating costs are just under Budget. Core operating costs are £59m higher than Budget, mainly from higher bad debt charges from enforcement income and pressures from higher bus retender costs. This is offset by contingency (budgeted to mitigate risks on revenue)
- Our Budget included delivery of £259m of savings this year, including £130m of recurring savings
- We have implemented cost saving measures to help mitigate the revenue pressure

### Grow our operating surplus

- We had budgeted for an operating surplus in the year to date – lower passenger income means we have a deficit of £32m at Period 7
- Our latest forecast is for an operating surplus of £23m this year, £138m lower than Budget, but still a small growth in underlying surplus compared to 2023/24
- We have seen several economic headwinds this year – slower economic growth, pressures on real-terms disposable income and a slower fall in inflation than anticipated. This has led to slower than expected growth in passenger demand and higher cost inflation in the supply chain



- More recently, there was the cyber security incident, throughout which TfL managed to prevent significant disruption to customers and Londoners. However, unplanned costs were necessarily incurred to ensure London could keep moving while dealing with the incident
- With a continued focus on cost control and the use of contingency included in the 2024/25 Budget, the impact of these headwinds has been reduced

#### Fund our capital investment

- Capital renewals are £445m in the year to date, £85m up on last year as we increase renewals investment to address the backlog of asset replacement
- Renewals are £9m higher than Budget, from an early ramp up in spend and some cost increases. We expect to hit Budget over the full year

#### Maintain liquidity to protect us against shocks

- Cash balances are £1.18bn at the end of Period 7 and are almost £230m lower than Budget, a result of revenue pressures and timing of borrowing
- The GLA financing facility of £350m offers additional protection against shocks and risks

### Advertising Annual Report 2023/24

In early October we published our Advertising Annual Report for 2023/24. The report covers the work that has taken place across advertising, commercial partnerships, brand licensing and filming and photography, which has contributed to an impressive £154m of commercial revenue.

The report includes examples of our campaigns across 2023/24, demonstrating how we generate revenue through innovative campaigns with our brand partners. It illustrates how our advertising estate continues to offer more exciting and attractive options to brands, including a 3D anamorphic effect on our large-format sites.



Showcasing imaginative campaigns across our estate



Delivering more affordable housing across the city

### Places for London

#### More than 1,200 homes completed

We recently reported that Places for London has delivered more than 1,200 homes on our land. Work continues across our estate to deliver more housing towards our target to start 20,000 homes by 2031. In north London we are progressing with our plans at High Barnet station. Our designs could see around 300 new homes delivered across five blocks, with at least 40 per cent being affordable.

Anticipated benefits include more public open space and a better station environment with improved access and safety, which will encourage sustainable and active travel. We will add cycle parking facilities for use by both residents of the development and the public. The proposed scheme, on brownfield land, also puts sustainability at its heart, including enhanced ecology and biodiversity of public open space as part of projects.

#### Southwark station

Places for London has started public consultation on a mixed-use, purpose-built student scheme at Southwark station comprising 430 self-contained studios for students alongside 40 affordable homes on the adjacent site.

### New lettings across our estate

Last year, Places for London acquired Buck Street Market, next to Camden Town station. We have since worked with our partner BOXPARK, and BOXPARK Camden market has now opened on our land, transforming the space into an inclusive and welcoming market for locals and visitors to enjoy year-round. The three-floor market includes 60 independent food and retail traders complete with a rooftop terrace, enhancing the site's appeal as a vibrant social hub.

Elsewhere, Places for London has finished key lettings at locations including Piccadilly, Ealing Broadway, South Wimbledon, Canada Water and Victoria Station Arcade. Notably, after major infrastructure works, we completed a flagship letting at Baker Street to Market Place.

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## About us

Part of the Greater London Authority family led by Mayor of London Sadiq Khan, we are the integrated transport authority responsible for delivering the Mayor's aims for transport. We have a key role in shaping what life is like in London, helping to realise the Mayor's vision for a 'City for All Londoners' and helping to create a safer, fairer, greener, healthier and more prosperous city. The Mayor's Transport Strategy sets a target for 80 per cent of all journeys to be made by walking, cycling or using public transport by 2041. To make this a reality, we prioritise safety, sustainability, health and the quality of people's experience in everything we do.

We run most of London's public transport services, including the London Underground, London Buses, the DLR, London Overground, Elizabeth line, London Trams, London River Services, London Dial-a-Ride, Victoria Coach Station, Santander Cycles and the IFS Cloud Cable Car.

We manage the city's red route strategic roads and are responsible for the maintenance, management and operation of more than 6,000 sets of traffic lights across the capital. The London boroughs are responsible for all the remaining roads within their boundaries. The experience, reliability and accessibility of our services are fundamental to Londoners' quality of life. Safety remains our number one priority and we continue to work tirelessly to improve safety across the network for both colleagues and customers.

Our vision is to be a strong, green heartbeat for London. We are investing in green infrastructure, improving walking and cycling, reducing carbon emissions, and making the city's air cleaner. The Ultra Low Emission Zone, and fleets of increasingly environmentally friendly and zero-emission buses, are helping to tackle London's toxic air. We are also improving public transport options, particularly in outer London, to ensure that more people can choose public transport or active travel over using their vehicles.

That is why we are introducing the outer London Superloop bus network, providing express bus routes circling the entire capital, connecting outer London town centres, railway stations, hospitals and transport hubs.

We have constructed many of London's most significant infrastructure projects in recent years, using transport to unlock economic growth and improve connectivity. This includes major projects like the extension of the Northern line to Battersea Power Station and Nine Elms in south London, as well as the completion of the London Overground extension to Barking Riverside and the Bank station upgrade.

The Elizabeth line, which opened in 2022, has quickly become one of the country's most popular railways, adding 10 per cent to central London's rail capacity and supporting new jobs, homes and economic growth. We also use our own land to provide thousands of new affordable

homes and our own supply chain creates tens of thousands of jobs and apprenticeships across the country.

We are committed to being an employer that is fully representative of the community we serve, where everyone can realise their potential. Our aim is to be a fully inclusive employer, valuing and celebrating the diversity of our workforce to improve services for all Londoners.

We are constantly working to improve the city for everyone. This means using information, data and technology to make services intuitive and easy to use and doing all we can to make streets and transport services accessible and safe to all. We reinvest every penny of our income to continually improve transport networks for the people who use them every day. None of this would be possible without the support of boroughs, communities and other partners who we work with to improve our services. By working together, we are creating brighter journeys and a better city.



**Board**

**Date: 4 December 2024**

**Item: Finance Report – Period 7, 2024/25**

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**This paper will be considered in public**

## **1 Summary**

1.1 The Finance Report Presentation at Appendix 1 sets out TfL's financial results to the end of Period 7, 2024/25 (1 April to 12 October 2024).

## **2 Recommendation**

2.1 **The Board is asked to:**

(a) **note the Finance Report; and**

(b) **note the TfL 2024/25 Budget and the TfL 2024 Business Plan remain in place and are the basis for Financial Authority for financial commitments that may be made before the TfL 2025/26 Budget is approved in March 2025 (save where unbudgeted Financial Authority is required, approval for which will be sought in accordance with Standing Orders).**

## **3 Financial Reporting to the Board**

**Finance Report – Period 7, 2024/25**

3.1 The Finance Report Presentation provides a summary of TfL's year-to-date financial performance against the Budget approved by the Finance Committee on 13 March 2024 (in accordance with authority delegated by the Board).

## **4 Draft Greater London Authority (GLA) Budget Submission**

4.1 On 22 November 2024, TfL made a draft budget submission into the GLA Group consolidated budget, which is open to consultation from December 2024 and will be finalised in February 2025.

4.2 This submission covers an updated forecast for 2024/25 and a forward look from 2025/26 to 2027/28. It is an update and extension to the TfL 2024/25 Budget which was approved by the Finance Committee on 13 March 2024 and the TfL 2024 Business Plan which was approved by the Finance Committee on 22 December 2023, in each case under authority delegated by the Board.

4.3 This budget submission incorporates the £485m of capital funding for 2025/26 awarded in the Government's Budget 2024, published on 30 October 2024. This was made as part of Phase 1 of the Spending Review to enable TfL to continue to deliver its current capital programme and its committed major capital projects. This was confirmed in a funding settlement letter to the Mayor on the same day. A copy of [this funding settlement and earlier agreements](#) are published on TfL's website.

- 4.4 The 30 October 2024 funding settlement letter confirmed the Government’s understanding of “the importance of long-term funding certainty to enable investment in critical upgrades to major capital projects” and stated that the Department for Transport would “continue to work with TfL with the aim to place it on a long-term financially sustainable footing as part of Phase 2 of the Spending Review”.
- 4.5 With Phase 2 of the Spending Review just beginning, and the uncertainty over its capital funding beyond 2025/26, TfL has not produced its own medium-term business plan this year. For this budget submission, TfL has completed a focused update on the 2025/26 budget, with a lighter touch approach to the years 2026/27 and beyond, retaining key investment assumptions made in the TfL 2024 Business Plan. A more comprehensive update will be made in autumn 2025 following the outcome of Phase 2 of the Spending Review in spring 2025.
- 4.6 The TfL 2024 Business Plan remains in place until a replacement is approved by the Board and the TfL 2025/26 Budget is due to be approved by the Board in March 2025; until that time, therefore, in accordance with TfL’s Standing Orders, Financial Authority is in place at the values set out in the TfL 2024/25 Budget and the TfL 2024 Business Plan.

**List of appendices to this report:**

Appendix 1: Finance Report Presentation

**List of Background Papers:**

None

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Appendix I

# Finance Report

## Period 7, 2024/25

Management results from 1 April 2024 – 12 October  
2024

Page 59

Board

4 December 2024



# We are aiming to offset the impact of lower growth in demand on our ability to invest



We delivered an operating surplus in 2023/24, reinvesting this in maintaining and improving our network. Our 2024/25 Budget builds on this foundation, aiming to increase our ability to invest by continuing to deliver on our financial strategy:

**Grow and diversify our revenue**

- Cumulative journey growth in the year to date is 1.6%, slightly down from the 2% reported in Period 5. In our budget we were targeting 6% year-on-year journey growth over the full year, on top of the 9% we saw in 2023/24.
- Despite growth on last year, journeys are 74 million lower than Budget with passenger income £111m lower than Budget.
- Our latest forecast is for passenger income to be £300m up on last year, but £188m lower than Budget.

**Deliver recurring cost savings**

- Total operating costs are just under Budget. Core operating costs are £59m higher than Budget, mainly from higher bad debt charges from enforcement income and pressures from higher bus retender costs. This is offset by contingency (budgeted to mitigate risks on revenue).
- Our Budget included delivery of £259m of savings this year, including £130m of recurring savings.
- We have implemented cost saving measures to help mitigate the revenue pressure.

**Grow our operating surplus**

- We had budgeted for an operating surplus in the year to date – lower passenger income means we have a deficit of £32m at Period 7.
- Our latest forecast is for an operating surplus of £23m this year, £138m lower than Budget, but still a small growth in underlying surplus compared to 2023/24.
- Our forecast has worsened by £38m since Quarter 1, primarily a result of the impact of the recent cyber security incident.

**Fund our capital investment**

- Capital renewals are £445m in the year to date, £85m up on last year as we increase renewals investment to address the backlog of asset replacement.
- Renewals are £9m higher than Budget, from an early ramp up in spend and some cost increases. We expect to hit Budget over the full year.
- We have secured £485m of government capital funding for 2025/26.

**Maintain liquidity to protect us against shocks**

- Cash balances are £1.18bn at the end of Period 7 and are almost £230m lower than Budget, a result of revenue pressures and timing of borrowing.
- The Greater London Authority financing facility of £350m offers additional protection against shocks and risks.



# Our progress

Our underlying revenue has increased by over £2.7bn since 2020/21 and over £300m on last year, with increases from all revenue sources.

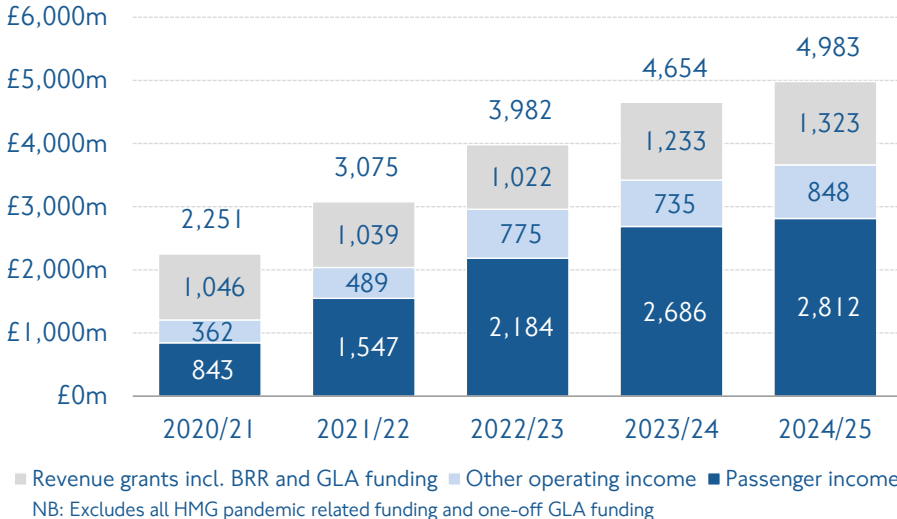
Real terms like-for-like operating costs are almost £300m lower than in 2020/21.

We turned an operating deficit into a surplus in 2023/24 through revenue increases and cost control. We are currently making a deficit, a result of lower than budgeted revenue growth and higher capital renewals. Our forecast surplus for this year is now £23m. We are continuing to take steps to deliver in excess of this.

Although our cash balance is temporarily below £1.2bn mainly due to timing differences, we are still forecasting to end the year above £1.3bn of cash.

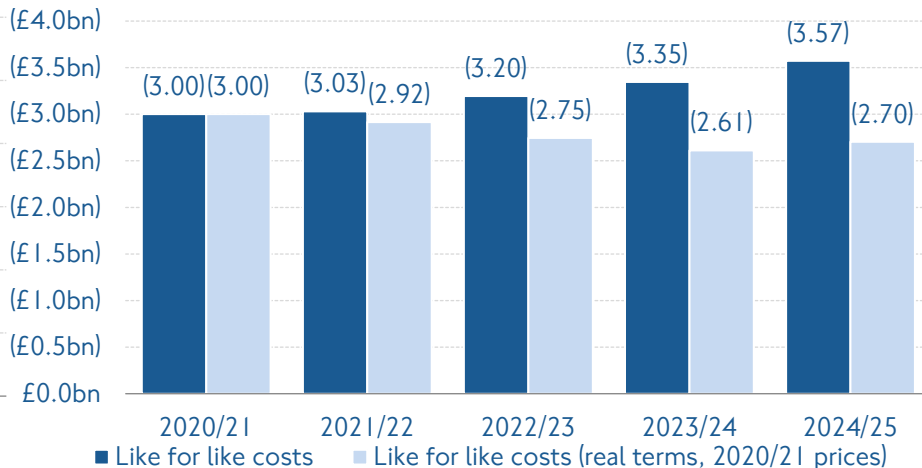
## Grow and diversify our revenue

Revenue (excluding extraordinary funding) – Year to Period 7 (£m)



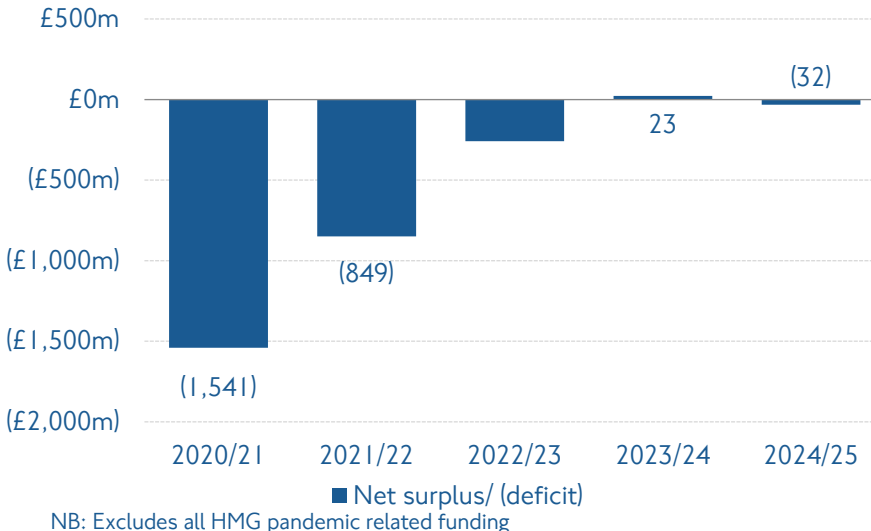
## Deliver recurring cost savings

Like-for-like costs since 2020/21 – Year to Period 7 (£bn)



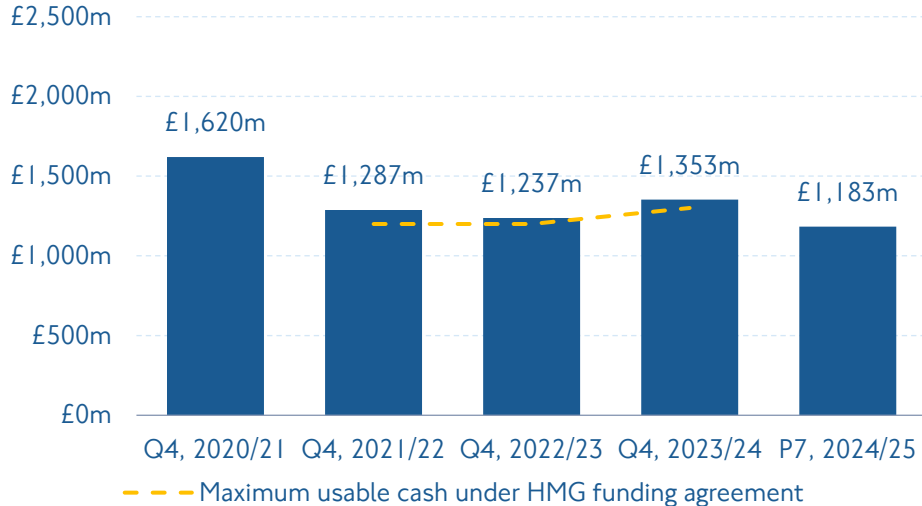
## Grow our operating surplus

Operating surplus / (deficit) – Year to Period 7 (£m)



## Maintaining liquidity to protect us against shocks

Cash balance (£m)



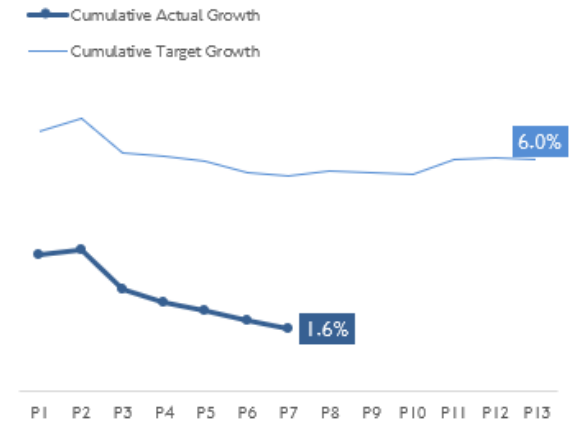
# Passenger journeys

In 2024/25 we have budgeted 6% year-on-year growth in demand. In the year to date, journeys are 1.6% up on last year, but are 74 million lower than Budget. This is largely owing to a range of economic factors, which are impacting both leisure and commuting demand. There is also a range of other factors impacting customer choices including seasonality, weather and national rail strikes.

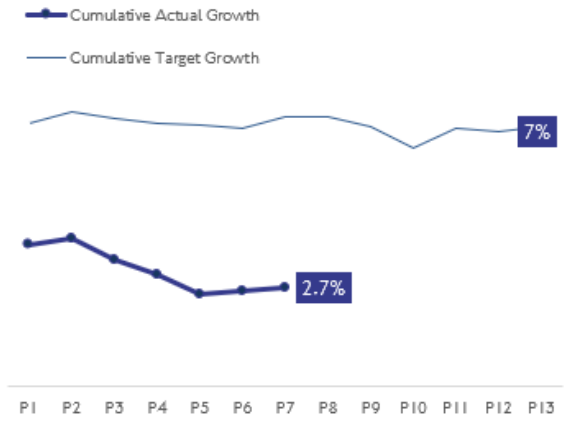
As a result of the cyber security incident, journey results are estimated based on income received. Journey data continues to be manually reconciled due to the cyber security incident; while we have confidence in passenger income, there is some uncertainty on journeys as we do not have complete demand data. This is not expected to be resolved until Quarter 3.

## Passenger journeys year-on-year growth and comparison to Budget

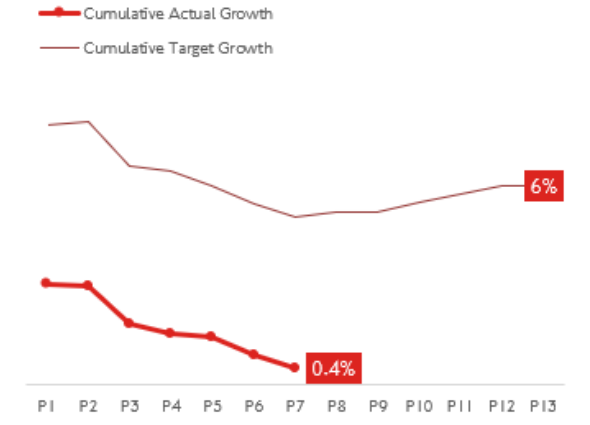
TfL	Absolute m		Var to Bud m		Var to Last Year (m/ %)	
	P	293	(13.6)	1.2	0.4%	
	Y	1,925	(74.2)	30.7	1.6%	



LU	Absolute m		Var to Bud m		Var to Last Year (m/ %)	
	P	96	(5.2)	3.1	3.3%	
	Y	639	(28.1)	16.6	2.7%	

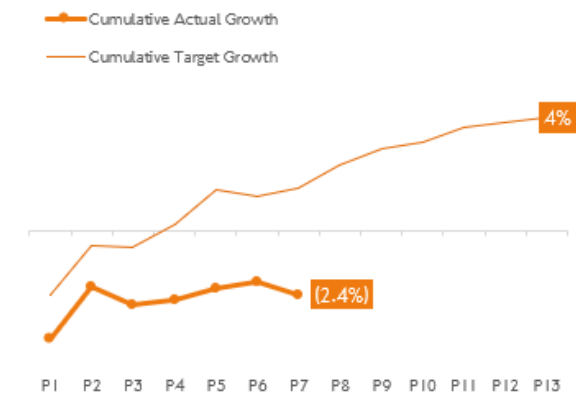


Bus	Absolute m		Var to Bud m		Var to Last Year (m/ %)	
	P	153	(6.5)	(2.4)	-1.6%	
	Y	1,004	(42.2)	4.2	0.4%	



## security

Rail	Absolute m		Var to Bud m		Var to Last Year (m/ %)	
	P	24	(2.1)	(1.3)	-5.1%	
	Y	159	(6.5)	(3.9)	-2.4%	

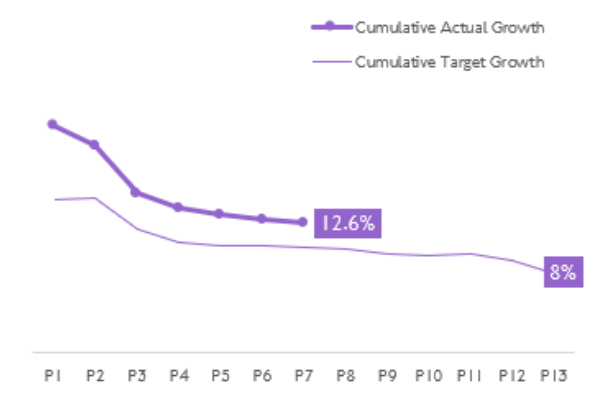


LO	Absolute m		Var to Bud m		Var to Last Year (m/ %)	
	P	14	(1.5)	(0.7)	-4.9%	
	Y	97	(4.1)	(0.3)	-0.4%	

DLR	Absolute m		Var to Bud m		Var to Last Year (m/ %)	
	P	8	(0.3)	(0.4)	-4.5%	
	Y	52	(2.1)	(1.7)	-3.2%	

Tram	Absolute m		Var to Bud m		Var to Last Year (m/ %)	
	P	1	(0.2)	(0.2)	-10.1%	
	Y	9	(0.3)	(1.8)	-16.5%	

EL	Absolute m		Var to Bud m		Var to Last Year (m/ %)	
	P	19	0.3	1.8	10.4%	
	Y	123	2.6	13.8	12.6%	



# Economic context

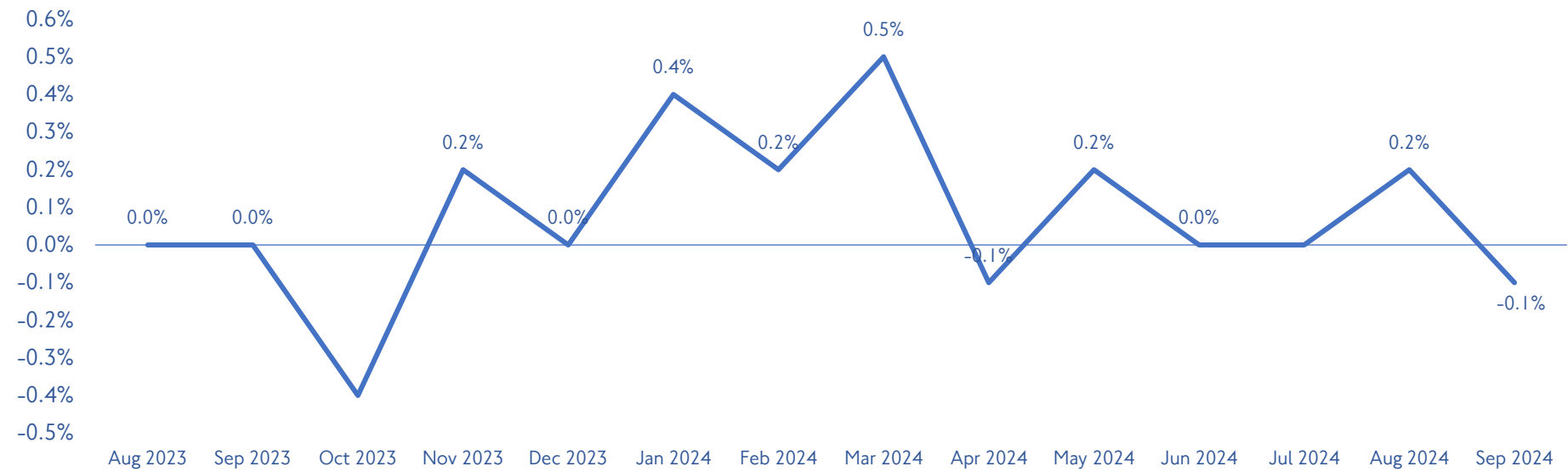
Economic growth has been lower than expected. The economic forecast that underpinned our Budget estimated gross domestic product (GDP) growth at between 1% and 1.6% this year. However, GDP has been relatively flat.

Wages are growing in real terms, but are lower than pre-pandemic levels and affect individuals and households differently. Younger adults, who use our services more, are seeing lower wage growth, especially relative to housing costs.

Wage growth in London is skewed by housing costs. On average, Londoners spend 17% of their income on housing costs, compared to c.10% or less in other regions of the UK. The proportion of income spent on housing has fallen significantly since the financial crisis in every region except for London.

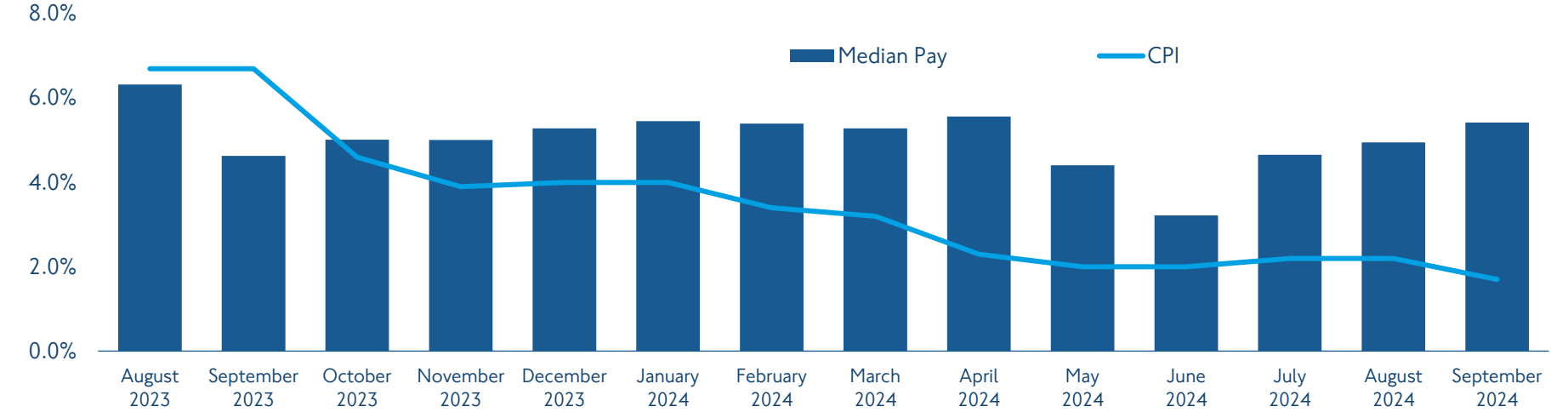


## Economic growth remains sluggish



ONS, GDP monthly estimate, UK: September 2024 (November 2024)

## The UK is seeing real-terms wage growth, but this affects households differently



ONS, Earnings and employment from Pay As You Earn Real Time Information, non-seasonally adjusted (November 2024)

# Income statement

In the year to date we have made an operating deficit of £32m. Our latest forecast is to deliver an operating surplus of £23m, which is down from our earlier Quarter 1 forecast of £61m largely due to the financial impacts of the cyber security incident.

Passenger income is £111m lower than Budget in the year to date, driven by lower passenger growth than expected. Other operating income is £91m up on Budget from higher ULEZ enforcement income.

Our core operating costs are £59m higher than Budget, mainly from higher bad debt charges from enforcement income. Exceptional costs are £58m lower, mainly from central contingency, which was budgeted to mitigate revenue uncertainty in the year. Exceptional costs include £5m of cyber security incident costs.

	£m	Actuals	Variance to Budget		Variance to last year	
Underlying passenger income		2,812	(111)	-4%	126	5%
DfT revenue top up		0	0	N/A	(90)	-100%
<b>Passenger income</b>		<b>2,812</b>	<b>(111)</b>	<b>-4%</b>	<b>36</b>	<b>1%</b>
Other operating income		848	11	1%	113	15%
Business rates retention		1,168	0	0%	138	13%
Other revenue grants		154	(8)	-5%	(48)	-24%
<b>Revenue</b>		<b>4,983</b>	<b>(108)</b>	<b>-2%</b>	<b>239</b>	<b>5%</b>
Core operating costs		(4,249)	(59)	-1%	(391)	-10%
Investment programme operating costs		(84)	8	9%	100	54%
Exceptional costs		(5)	58	91%	(3)	-124%
<b>Operating surplus before interest and renewals</b>		<b>644</b>	<b>(101)</b>	<b>-14%</b>	<b>(55)</b>	<b>-8%</b>
Capital renewals		(445)	(9)	-2%	(85)	-24%
Net interest costs		(231)	(7)	-3%	(5)	-2%
<b>Operating surplus / (deficit)</b>		<b>(32)</b>	<b>(117)</b>	<b>-138%</b>	<b>(145)</b>	<b>-128%</b>
<b>Places for London net contribution</b>		<b>18</b>	<b>3</b>	<b>24%</b>	<b>(11)</b>	<b>-39%</b>
<b>Operating surplus/ (deficit) including Places for London</b>		<b>(14)</b>	<b>(113)</b>	<b>-114%</b>	<b>(156)</b>	<b>-110%</b>

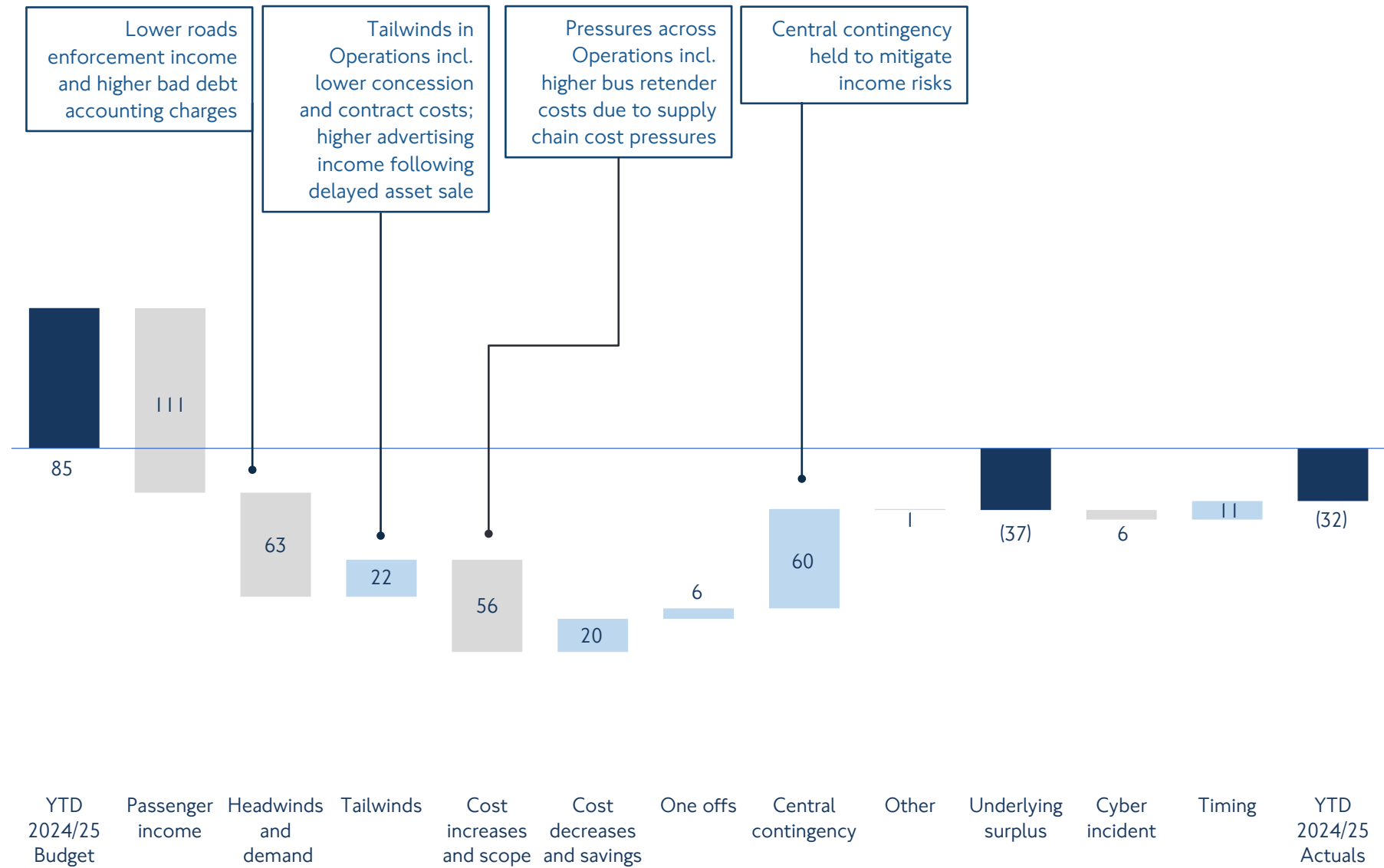
# Operating surplus

We have an operating deficit of £32m in the year to date, which is £117m worse than Budget. After adjusting for timing differences – mainly in capital renewals and Investment Programme operating costs, and the impact of the recent cyber security incident – we are making a deficit of £37m, £122m behind Budget.

We are seeing a combined £174m pressure on our surplus from demand and volume pressures on passenger income, roads enforcement income and enforcement payment rates. Core costs have seen pressures from higher bus retender prices, which we have partly mitigated through savings.

The revenue pressure has been partly mitigated by central contingency, which was included in our Budget to mitigate income risks.

Operating surplus/ (deficit) variance to Budget (£m)



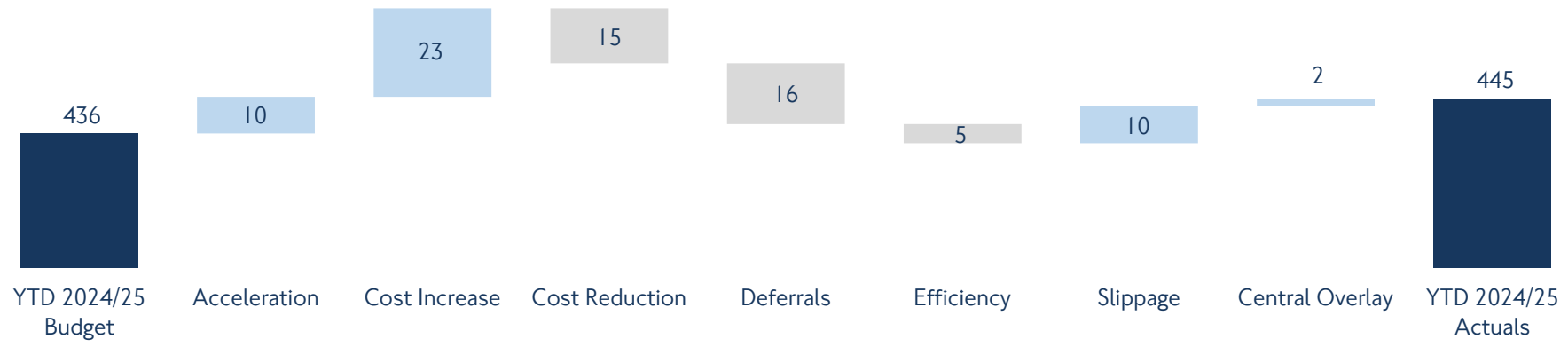
# Capital renewals

Capital renewals are £445m in the year to date, £85m up on last year as we increase renewals investment to address the backlog of asset replacement.

Renewals spend is £9m (2%) higher than Budget in the year to date. This is due to a combination of cost increases across LU Renewals and Technology projects to address asset condition and acceleration of works, partially offset by some cost reductions and deferrals of works in Streets, Bus and Rail & Sponsored Services Renewals and Estates.

	£m	Actuals	Variance to Budget		Variance to last year	
Four Lines Modernisation		(3)	1	19%	(0)	(0)
Silvertown Tunnel		(1)	1	62%	(1)	-487%
Streets, Bus & RSS Renewals		(96)	7	7%	(22)	-30%
Environment		(15)	(1)	-9%	(6)	-69%
Rail & Station Enhancements		(1)	(0)	-150%	2	72%
LU Renewals		(238)	(8)	-4%	(35)	-17%
Technology		(83)	(7)	-9%	(21)	-33%
Licensing & Regulation (TPH)		(3)	1	23%	0	4%
Estates Directorate		(6)	4	45%	(2)	-77%
Overlays		(0)	(6)	100%	0	95%
<b>Total</b>		<b>(445)</b>	<b>(9)</b>	<b>-2%</b>	<b>(85)</b>	<b>-24%</b>

Capital renewals variances compared to Budget, by causal (£m)



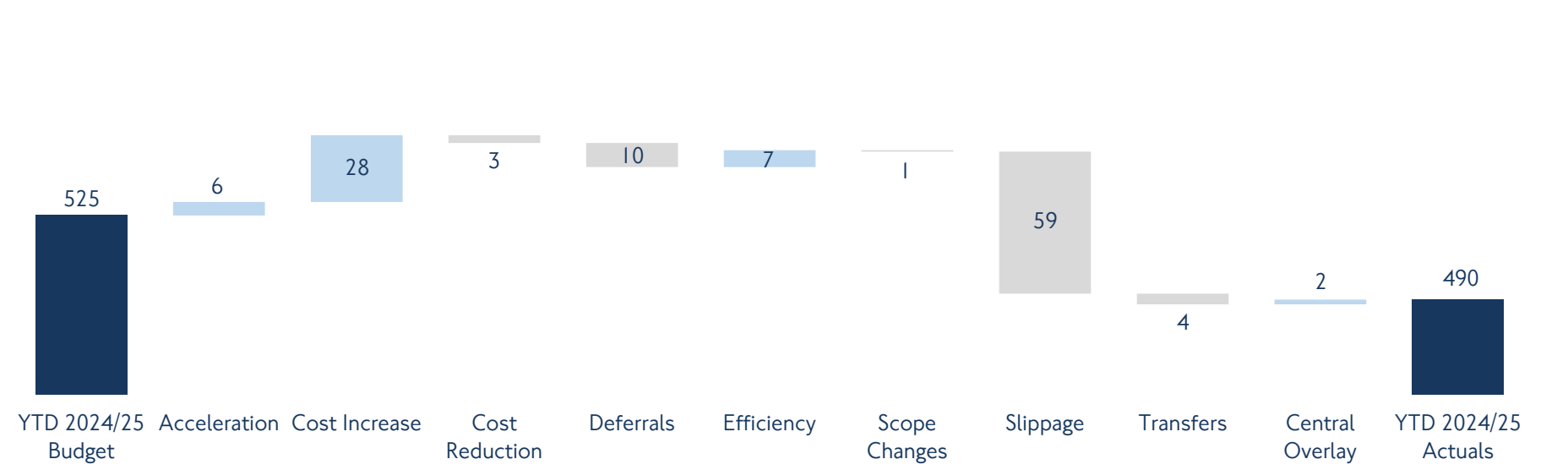
# Capital enhancements

Capital enhancements (excluding Places for London and Crossrail) are £490m in the year to date, £21m lower than last year.

Enhancements spend is £34m (7%) lower than Budget in the year to date, driven largely by slippage on delivery in Piccadilly line upgrade and delays across DLR Rolling Stock programme. This slippage is partially offset by cost increases in Silvertown Tunnel and Four Lines Modernisation project prolongation.

	£m	Actuals		Variance to Budget		Variance to last year	
Four Lines Modernisation	(39)	1	4%	12	24%		
DLR Rolling Stock Replacement	(109)	9	8%	0	0%		
Piccadilly Line Upgrade	(171)	24	12%	2	1%		
Bakerloo Line Upgrade	(3)	0	11%	(2)	-303%		
Trams replacement	(1)	1	36%	(0)	-40%		
Other enhancements	(167)	(1)	-1%	10	5%		
<b>Total TfL excl. Places and Crossrail</b>	<b>(490)</b>	<b>34</b>	<b>7%</b>	<b>21</b>	<b>4%</b>		
Places for London	(74)	28	28%	(17)	-29%		
Crossrail	(16)	16	51%	17	51%		
<b>Total</b>	<b>(579)</b>	<b>79</b>	<b>12%</b>	<b>21</b>	<b>4%</b>		

Capital enhancements variances compared to Budget, by causal (£m)



# Cash flow

Cash balances are £1.18bn at the end of Period 7, almost £230m lower than Budget and £170m lower than at the end of 2023/24.

Our cash balances are lower than Budget mainly as a result of lower revenue, timing of borrowings and adverse working capital movements.

Our Treasury policy is to ensure we have on average 60 days of operating costs as our minimum cash balance, which will allow us to meet our payment obligations. We are temporarily below that in Period 7, but are still forecasting to be above £1.3bn for the year-end.

We maintain other sources of liquidity including an overdraft facility, a short-term financing facility and the £350m GLA financing facility to absorb any shocks and withstand strategic, safety and operational risks.

## Cash balances

	£m	Actuals	Variance to Budget		Variance to last year	
Opening balance		1,353	(56)	-4%	115	9%
Change in cash balance		(170)	(171)	-11175%	(64)	-60%
<b>Closing balance</b>		<b>1,183</b>	<b>(227)</b>	<b>-16%</b>	<b>51</b>	<b>5%</b>

## Cash flow statement

	£m	Actuals	Variance to Budget		Variance to last year	
<b>Operating surplus before capital renewals and interest</b>		644	(101)	-14%	(55)	-8%
Less LTIG and LTM		2	3	556%	2	4594%
<i>Cash generated / (used) from operating activities</i>		<b>646</b>	<b>(98)</b>	<b>-13%</b>	<b>(52)</b>	<b>-8%</b>
Capital renewals		(445)	(9)	-2%	(85)	-24%
New capital investment		(490)	34	7%	21	4%
Investment grants and ring-fenced funding		135	(7)	-5%	(368)	-73%
Working capital movements		(141)	(40)	-40%	(66)	-88%
<i>Cash generated / (used) from investing activities</i>		<b>(941)</b>	<b>(22)</b>	<b>-2%</b>	<b>(498)</b>	<b>-112%</b>
<b>Free cash flow</b>		<b>(295)</b>	<b>(120)</b>	<b>-69%</b>	<b>(550)</b>	<b>-216%</b>
Net interest costs		(231)	(7)	-3%	(5)	-2%
Net borrowings		356	(45)	-11%	491	363%
<i>Cash generated / (used) from financing activities</i>		<b>125</b>	<b>(51)</b>	<b>-29%</b>	<b>486</b>	<b>135%</b>
<b>Change in cash balance</b>		<b>(170)</b>	<b>(171)</b>	<b>-11175%</b>	<b>(64)</b>	<b>-60%</b>

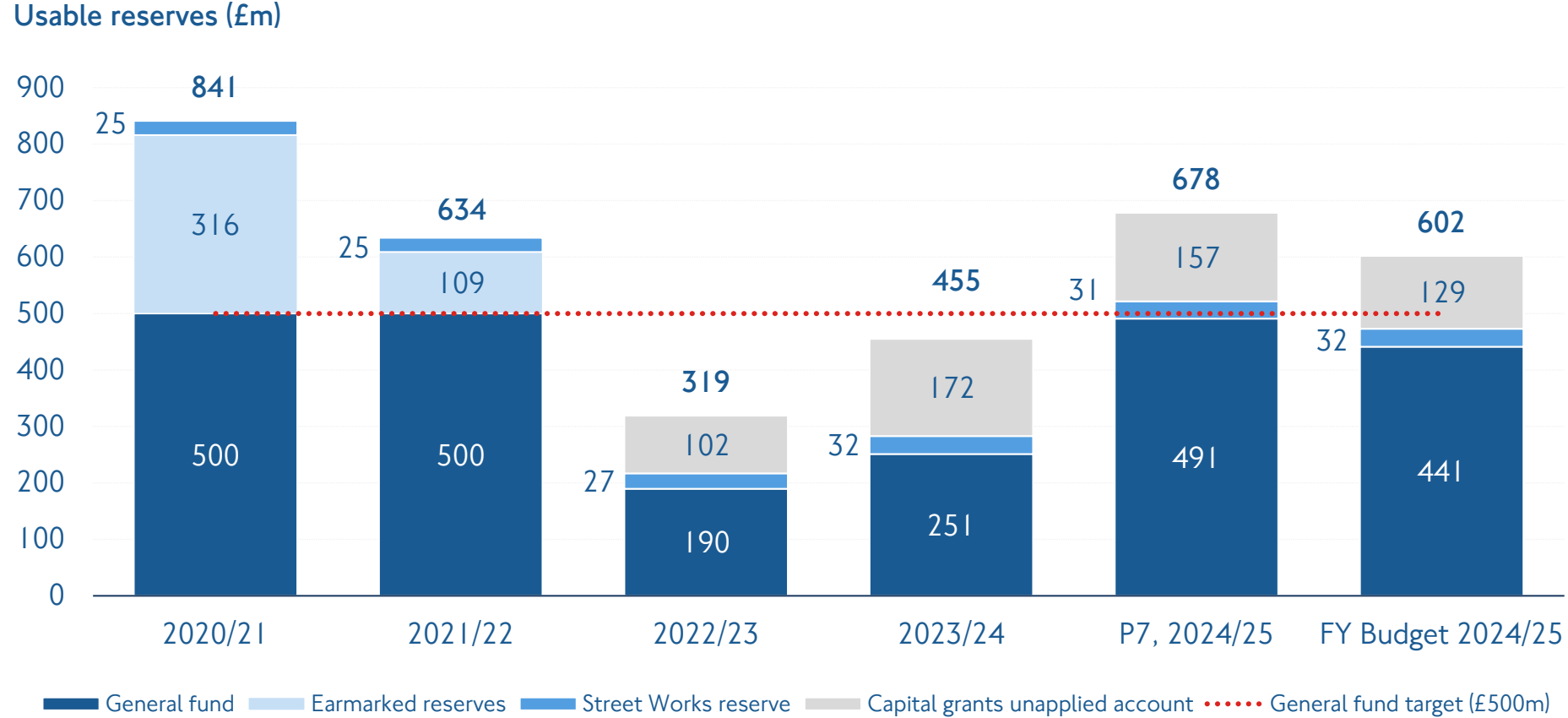


# Reserves

The pandemic has seen a material reduction in TfL’s usable reserves, which primarily consist of its general fund, earmarked reserves and capital grants unapplied account.

Usable reserves are generally lower than TfL’s cash balance, as elements of cash will be restricted for certain purposes and because cash payments are made in arrears in-line with supplier payment terms.

At the end of 2022/23, TfL’s General Fund reserves fell below our target of £500m. This was largely driven by the purchase of the Class 378 rolling stock. The savings from this purchase over the remaining life of the assets will further support TfL as it rebuilds its usable reserves.



- Usable reserves are those that can be applied to fund future expenditure. They are made up of the general fund, earmarked reserves, the capital grants unapplied account and the street works reserve
- The general fund represents sufficient cash-backed reserves held by TfL to cover risks that may arise. TfL has a target General Fund balance of £500m, which was increased from £150m at the start of the pandemic in March 2020. The pandemic depleted TfL’s reserves and it is now rebuilding these towards its target level.
- Capital grants unapplied account reflect where capital grants have been received in advance of expenditure being incurred on specific third-party funded projects.

# Debt

We have borrowed from a range of sources to help fund our capital programme.

Our level of outstanding borrowing has increased by £383m for the year, bringing our total borrowing balance to £13,345m. This is driven by an increase in our long and short-term borrowing, to fund our capital spend and manage our liquidity.

Our total debt is forecast to increase later this year – in line with our budget – as we continue to borrow to fund our investment programme.

Prudential indicator debt limits *	£m
Operational boundary	13,454
Authorised limit	14,654

\* Excludes PFI and long-term liabilities



## Total debt (£m)



# 90%

90% of our borrowing is at a fixed rate of interest

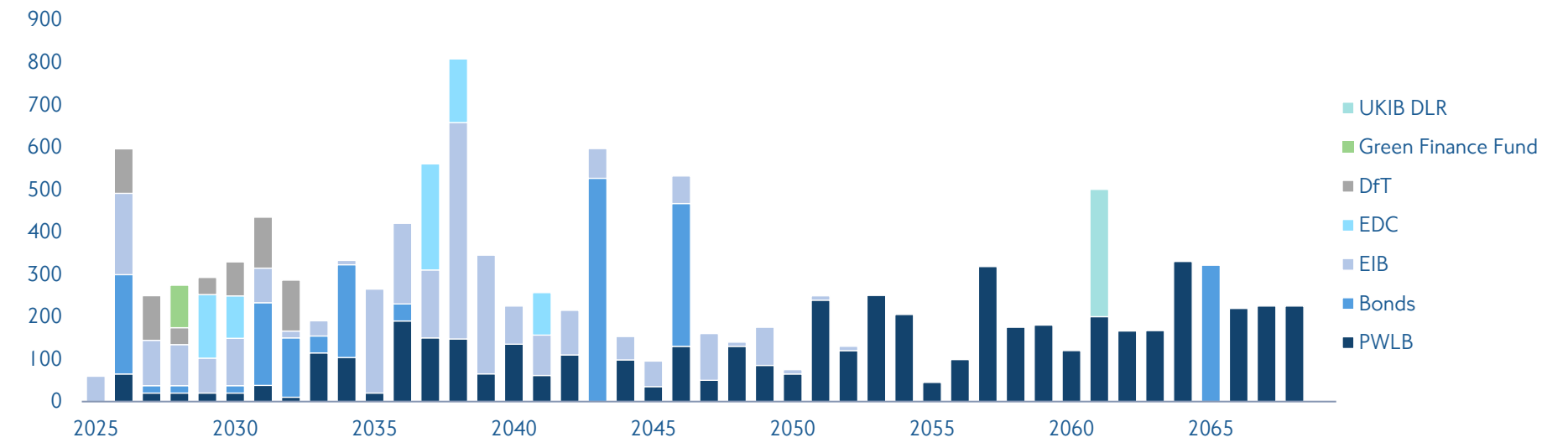
# 3.6%

The weighted average interest rate on our borrowing is around 3.6%

# 18-years

The weighted average tenor of our borrowing is just over 18 years

## TfL borrowing maturity profile (£m)



# Credit ratings

We are rated by three major credit rating agencies. This allows us to attract interest from a wide pool of investors and gives us access to a range of funding sources.

There have been no changes since our Period 5 update to the Board.

	S&P	Moody's	Fitch
Long-term rating	AA-	A2	AA-
Outlook	Stable	Stable	Stable
Short-term rating	A-I+	P-I	F I+
Last changed/affirmed	May 2024	July 2024	Apr 2024

### S&P

On 20 May 2024, S&P upgraded TfL's long-term credit rating to AA- from A+ and the short-term credit rating to A-I from A-I. The outlook is stable. The key drivers for S&P include the post-coronavirus pandemic recovery in passenger demand, which S&P expects to remain high, cost-efficiency measures, supporting our ability to cope with external shocks and rebuild flexibility within our operations and the expectation of a gradual increase in capital investments and the quality of services.

### Moody's

On 15 July 2024, Moody's upgraded TfL's long-term credit rating to A2 from A3 and the short-term credit rating to P-I from P-2. The outlook was changed to stable from positive. The rating is based on "significant improvements in TfL's operating performance" which Moody's expect to be sustained with growing operating surpluses over the medium term. Moody's stated the following as key drivers for this - the recovery in passenger revenue post-pandemic, new revenue sources and TfL's robust governance practices, particularly its focus on cost control, which have eliminated the need for any financial support from the central government to fund operations.

### Fitch

Fitch reaffirmed our credit rating in January 2024 and upgraded the outlook from negative to stable on 15 April 2024, reflecting the change in the UK rating (with which our rating is equalised).

# Q2 Forecast

During 2024-25 there have been several economic headwinds – slower economic growth, pressures on real-terms disposable income and a slower fall in inflation than anticipated. This has led to slower than expected growth in passenger demand and higher cost inflation in the supply chain.

More recently, there was the cyber security incident, throughout which TfL managed to prevent significant disruption to customers and Londoners. However, unplanned costs were necessarily incurred to ensure London could keep moving while dealing with the incident.

With a continued focus on cost control and the use of contingency included in the 2024-25 budget, the impact of these headwinds has been reduced. TfL continues to grow its operating surplus on an underlying basis compared to 2023-24 – albeit at a slower rate than previously planned.

## Income Statement

	£m	Full-year forecast, 2024/25	Variance to Budget		Variance to last year	
Underlying passenger income		5,342	(188)	-3%	297	6%
DfT revenue top up		0	0	N/A	(188)	-100%
<b>Passenger income</b>		<b>5,342</b>	<b>(188)</b>	<b>-3%</b>	<b>109</b>	<b>2%</b>
Other operating income		1,540	63	4%	21	1%
Business rates retention		2,170	0	0%	256	13%
Other revenue grants		290	0	0%	(107)	-27%
<b>Revenue</b>		<b>9,342</b>	<b>(125)</b>	<b>-1%</b>	<b>278</b>	<b>3%</b>
Core operating costs		(7,896)	(105)	1%	(463)	6%
Investment programme operating costs		(169)	(16)	10%	144	-46%
Exceptional costs		(23)	114	-83%	19	-45%
<b>Operating surplus before interest and renewals</b>		<b>1,254</b>	<b>(132)</b>	<b>-10%</b>	<b>(22)</b>	<b>-2%</b>
Capital renewals		(798)	(3)	0%	(36)	5%
Net interest costs		(432)	(4)	1%	(19)	5%
<b>Operating surplus / (deficit)</b>		<b>23</b>	<b>(138)</b>	<b>-86%</b>	<b>(76)</b>	<b>-77%</b>
<b>Places for London net contribution</b>		<b>27</b>	<b>1</b>	<b>4%</b>	<b>(12)</b>	<b>-31%</b>
<b>Operating surplus/ (deficit) including Places for London</b>		<b>50</b>	<b>(137)</b>	<b>-73%</b>	<b>(88)</b>	<b>-64%</b>



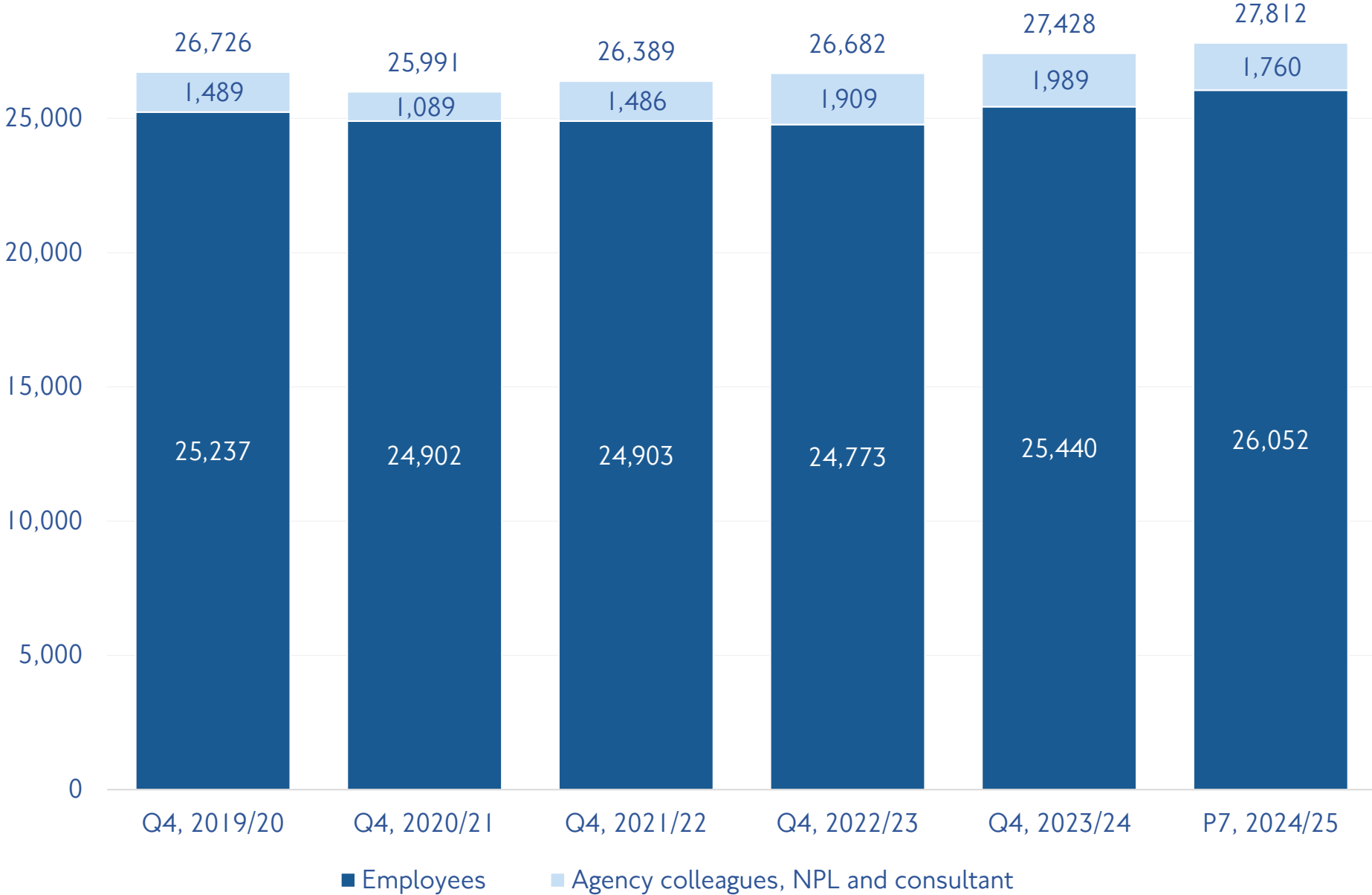
# Colleagues

The increase in headcount reflects the ramp up of our capital programme and new services introduced in the last three years, including the Elizabeth line, Northern Line Extension and Barking Riverside extension.

Permanent employee numbers are above pre-pandemic levels, and up on last year, driven by recent recruitment of graduates and apprenticeship trainees, and ramp up of our capital programmes.

Agency and non-permanent labour (NPL) colleagues have increased by just over 250 since the end of 2019/20, but remain significantly lower than 2015/16 levels. Due to the actions we have been taking, the numbers have reduced since the end of the last financial year 2023/24. NPL offers flexibility, particularly through time of change and temporary peaks in demand.

Headcount trends since 2019/20



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**Board**



**Date: 4 December 2024**

**Item: Silvertown and Blackwall Tunnels User Charges**

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**This paper will be considered in public**

## **1 Summary**

- 1.1 The Silvertown Tunnel is due to open in spring 2025. User charges will apply at both the Blackwall Tunnel and the Silvertown Tunnel once the latter opens and this report is a decision-making report for these new charges. Between 10 July and 3 September 2024, we consulted members of the Silvertown Tunnel Implementation Group (STIG), the public and other stakeholders on the proposed charge levels, discounts and exemptions. The user charges must be set out in a Statement of Charges which must be published at least 56 days in advance of the charges applying.
- 1.2 This paper seeks the Board's approval of the initial user charges and the publication of the Statement of Charges so that the initial user charges can apply when the Silvertown Tunnel opens, as well as approvals in relation to the process for future changes to charges. A report on the recent consultation and other relevant documents are appended as context to this decision. The process followed in developing the initial user charges is explained below, followed by an outline of how future reviews will be undertaken. Part of this process is that TfL will present its recommendations for the initial user charges to the Board for approval.

## **2 Recommendations**

**2.1 The Board is asked to note the paper and:**

- (a) approve the initial user charges for the Silvertown and Blackwall tunnels as set out in the Statement of Charges at Appendix 1 (which has been updated following the consultation) after having considered:**
- (i) the consultation report (at Appendix 2);**
  - (ii) whether the relevant policies of the Charging Policies and Procedures document (CPAP; at Appendix 3) have been met, in particular Policies 9 and 10, and Procedure 1 has been followed;**
  - (iii) the User Charge Assessment Framework (at Appendix 4);**
  - (iv) the equality impact assessment (at Appendix 5); and**
  - (v) the recommended changes to the Statement of Charges;**

- (b) approve for publication the Statement of Charges as updated post-consultation;**
- (c) authorise the Commissioner to make minor changes and corrections to the approved Statement of Charges, publish any amended Statement of Charges and do anything else they consider necessary or desirable to implement the user charges for the Silvertown and Blackwall tunnels; and**
- (d) delegate to the Finance Committee authority to approve:**
  - (i) any future proposed changes to the user charges and associated charges (such as penalty charges) for the Silvertown and Blackwall tunnels including but not limited to any changes to reflect inflationary increases; and**
  - (ii) the publication of any amended Statement of Charges which reflects such changes in line with Procedure 4 of the CPAP.**

### **3 Background**

- 3.1 The Silvertown Tunnel is due to open in spring 2025 and will address the long-standing issues of chronic congestion, journey time delay and lack of network resilience and reliability at the Blackwall Tunnel. From its opening, user charges will apply at both the Silvertown Tunnel and the Blackwall Tunnel.
- 3.2 The Scheme (the construction of the Silvertown Tunnel and the introduction of user charges at the Silvertown and the Blackwall tunnels) will provide benefits in terms of better and more reliable journey times for river crossings and an increase in public transport capacity and connectivity. The package of the new crossing, user charge (including discounts and exemptions), cross-river bus network and proposed concessions will help manage traffic congestion and emissions, and support sustainable growth.
- 3.3 The Silvertown Tunnel was designated as a Nationally Significant Infrastructure Project in 2012. A Development Consent Order (DCO) provides the necessary consent for projects which have been classified as nationally significant. The Board approved the submission of the application for a DCO for the Scheme on 3 February 2016<sup>1</sup>. Following an examination in public and recommendations from the Planning Inspectorate, the Secretary of State for Transport granted development consent in May 2018 by making the Silvertown Tunnel Order 2018 (the DCO).
- 3.4 The DCO enables TfL to charge motor vehicles for using the Silvertown Tunnel and the Blackwall Tunnel from the time the Silvertown Tunnel is first open for public use. It provides that we must exercise these powers in accordance with the Charging Policies and Procedures (the CPAP) as certified by the Secretary of State (as set out in Appendix 3). Policy 1 of the CPAP states that we must impose user charges at the Silvertown and Blackwall tunnels to the extent that it is necessary or expedient to achieve the Project Objectives:

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<sup>1</sup><https://content.tfl.gov.uk/board-160203-item11-silvertown-tunnel.pdf>



- (a) PO1: to improve the resilience of the river crossings in the highway network in east and southeast London to cope with planned and unplanned events and incidents;
  - (b) PO2: to improve the road network performance of the Blackwall Tunnel and its approach roads;
  - (c) PO3: to support economic and population growth, in particular in east and southeast London by providing improved cross-river transport links;
  - (d) PO4: to integrate with local and strategic land use policies;
  - (e) PO5: to minimise any adverse impacts of any proposals on communities, health, safety and the environment;
  - (f) PO6: to ensure where possible that any proposals are acceptable in principle to key stakeholders, including affected boroughs; and
  - (g) PO7: to achieve value for money and, through road user charging, to manage congestion.
- 3.5 The primary purpose of the user charges is to manage traffic demand for the river crossings. By managing this traffic demand, the other impacts - principally environmental and social impacts - of the Scheme can be effectively managed and its Project Objectives met. A secondary reason for the user charges is to provide a means of helping to pay for the design and construction of the Silvertown Tunnel and the ongoing operation and maintenance of both Silvertown and Blackwall tunnels.
- 3.6 The DCO application in May 2016 was based on an 'Assessed Case' which set out a scenario of proposed charges, discounts and exemptions which would enable the Project Objectives to be met. However, it would not have been appropriate at that time - some nine years in advance of the tunnel opening - to specify the initial user charges, given that there was likely to be changes in circumstances (such as travel behaviour) during that period. Instead, the approach was to put in place a set of documents certified by the Secretary of State which provide a framework for preparing for and operating the Scheme. The suite of documents comprises the Monitoring and Mitigation Strategy (MMS), the Bus Strategy and the CPAP.<sup>2</sup>
- 3.7 The DCO and the CPAP set out how we must develop the initial user charges. This includes the need to refresh the assumptions in the Assessed Case using more up-to-date data relating to the vehicle fleet, population, employment and other factors including a policy review (the Refreshed Assessment). This Refreshed Assessment (a process begun in 2021 and completed prior to the recent consultation) has also been used to inform local highway mitigations and

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<sup>2</sup> All three documents are available on our website:  
<https://tfl.gov.uk/corporate/publications-and-reports/silvertown-tunnel-permission#:~:text=Timeline-.Permission%20for%20the%20tunnel,of%20State%20in%20May%202018>.

the cross-river bus network in the opening year, in line with the MMS and the Bus Strategy.

- 3.8 The Silvertown Tunnel Implementation Group (STIG) was established by the DCO and has had a role in the development of the user charges and will continue to be involved in the operation of the Scheme with regard to the user charges and local traffic mitigations. It comprises representatives from the following stakeholders in east and southeast London: the London Borough (LB) of Barking and Dagenham, LB of Bexley, LB of Bromley, City of London Corporation, the Royal Borough of Greenwich, LB of Hackney, LB of Lewisham, LB of Newham, LB of Redbridge, LB of Southwark, LB of Tower Hamlets, LB of Waltham Forest, as well as the Greater London Authority (GLA), TfL and National Highways.

#### **4 The procedure for setting and varying the proposed initial user charges**

- 4.1 As set out in policies 1- 4 of the CPAP, we must have regard to a number of factors when setting and varying the user charges (including the charge levels, the hours charged, the vehicle charges, discounts and exemptions and other factors related to user charging). Policy 1 was described in Section 3 above; Policy 2 sets out that we must ensure the user charges are fair, justified and will not undermine the Project Objectives; Policy 3 sets out that we must use the user charges to help fulfil our wider Network Management Duty under the Traffic Management Act 2004<sup>3</sup> to manage traffic demand at the Silvertown and Blackwall tunnels and make efficient use of the road network including other river crossings and reduce congestion. Policy 4 is described in Section 6 below.
- 4.2 Additionally, specific requirements apply to setting the initial user charges. These are set out in Procedure 1 below, which in turn refers to Policy 9: The extent to which the user charges will assist in achieving the Project Objectives is the primary consideration which TfL will have regard to when setting the initial user charges and Policy 10: TfL will set the initial charges at a level and subject to conditions so that the Scheme in operation is not likely to give rise to materially new or materially different environmental effects to those reported in the Environmental Statement.
- 4.3 Procedure 1 of the CPAP provides:
- TfL will propose the initial user charges for the Scheme, having regard to the factors set out in 3.2 [of the CPAP] above. TfL will follow the process set out below:
- (a) TfL will re-run the strategic traffic model (using up-to-date data);
  - (b) TfL will use the outputs of this model run to undertake a re-assessment of the significant likely effects of the proposed initial user charges on air

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<sup>3</sup> TfL's network management duty under the Traffic Management Act 2004 requires it to make sure road networks are managed effectively to minimise congestion and disruption to vehicles and pedestrians

quality, noise, socio-economic effects, in accordance with the approach adopted in the Environmental Statement;

- (c) TfL will populate the [User Charging Assessment Framework] with its impact assessment; and
  - (d) TfL will consult with members of STIG on the proposed charges for the opening year, and present the completed UCAF. STIG members may make recommendations or representations to TfL in response to these, and the views of STIG's members will be recorded under PO6 of the UCAF. TfL will then submit the proposed charges, including setting out the recommendations and representations of STIG members, to the TfL Board for approval. When deciding whether or not to approve the proposed charges the TfL Board must: in accordance with article 65 of the DCO have regard to any recommendations or representations made by members of STIG; and only approve the charges if it is satisfied that Policies 9 and 10 are met.
- 4.4 Procedure 1 refers to the User Charging Assessment Framework (UCAF). The UCAF was developed in order to assess the user charges and other mitigations (such as the local highway mitigations) against the Project Objectives and other measures. A template UCAF was appended to the CPAP considered during the DCO examination and certified by the Secretary of State. In addition, and prior to the recent consultation on the proposed charge levels, discounts and exemptions, we consulted with STIG on the metrics<sup>4</sup> to be used in the UCAF for determining the extent to which a Project Objective is met.
- 4.5 Procedure 1 and Policy 8 of the CPAP provide that, before setting the initial user charges, we will update our modelling using up-to-date inputs, and the outputs of this modelling and analysis will be used to determine whether any changes to the Assessed Case user charges are required to more effectively deliver the Project Objectives.
- 4.6 To make this determination, we refreshed the assumptions in the Assessed Case (the Refreshed Assessment), as set out in paragraph 3.7 above. We also updated the Assessed Case user charges by inflation since 2015. The output of this Refreshed Assessment indicated that the updated Assessed Case user charges continued to provide optimal performance when looking across a range of key metrics, as set out in the UCAF.
- 4.7 A completed draft UCAF formed part of the consultation materials. We have now updated this draft and produced a final version of the UCAF (as set out in Appendix 4) which reflects the minor changes to the user charges that we are recommending following the consultation, describes how these user charges continue to provide optimal performance and refers to where the responses from STIG to the consultation can be found.

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<sup>4</sup> Please see notes of meetings on 27 January 2022, 16 June 2022 and 23 February 2023 on the STIG webpage: <https://tfl.gov.uk/travel-information/improvements-and-projects/silvertown-tunnel-implementation-group>

4.8 With regard to the specific requirement of Policy 10, the UCAF records (in relation to PO5) that, with the proposed opening year user charge levels, the Scheme in operation at this charge level is not forecast to give rise to materially new or materially different environmental effects to those reported in the Environmental Statement. In the section ‘Compliance with Air Quality Mitigation’, the UCAF also notes that the user charges are forecast not to cause any exceedances of national air quality objectives and not worsen emissions overall. We will continue to monitor air quality against the national air quality objectives in accordance with the DCO requirements.

## 5 The proposed initial user charges

5.1 The proposed initial user charges are set out in the Statement of Charges. For ease of reference, Table 1 below shows the charge levels as they were consulted on. We are not proposing any changes to the charge levels in response to the consultation (although it is recommended that the classifications of ‘car and small vans’ and ‘large vans’ are amended to better accommodate electric vans as described in Section 8 below).

**Table 1: summary of charge levels consulted on and now recommended for approval**

<b>Silvertown and Blackwall tunnels user charges – 06:00 to 22:00</b>			
	<b>Charges paid via Auto Pay</b>		<b>Charges paid via other channels</b>
	<b>Standard off-peak charges</b>	<b>Peak charges</b> Mon-Fri only Northbound 06:00 - 10:00 Southbound 16:00 - 19:00	<b>At all times</b>
Motorcycle, moped, motor tricycle	£1.50	£2.50	£2.50
Car and small van	£1.50	£4.00	£4.00
Large van	£2.50	£6.50	£6.50
Heavy Goods Vehicles	£5.00	£10.00	£10.00
Penalty Charge Notice for non-payment - £180 (Reduced to £90 if paid within two weeks)			

- 5.2 The same user charges will apply at both the Blackwall and Silvertown tunnels, which is a fair approach, is easily understandable by the customer and enables us to ensure the benefits of the scheme are fully realised. The proposed charging hours are 06:00 to 22:00 every day, with an uncharged period when demand is lowest. No user charges will apply on Christmas Day. On other public or bank holidays, customers registered for Auto Pay would be charged off-peak rates within charging hours irrespective of the time of travel with customers who are not registered for Auto Pay charged the peak rate.
- 5.3 The user charges differ according to a number of variables, which enable us to fairly manage demand for the tunnels and ensure the Scheme in operation helps to achieve the relevant Project Objectives. These variables are: time of day and direction of travel; day of the week; vehicle type; the payment method used by the customer (customers using Auto Pay will be charged off-peak or peak charges depending on the time of travel; customers not registered for Auto Pay will always pay peak charges during charging hours); and whether the customer qualifies for a discount or exemption.
- 5.4 Having peak and off-peak charges will enable us to effectively manage demand and thereby achieve the Project Objectives, for example, by having a higher charge when demand is expected to be at its highest (at certain times on weekdays); and a directional flow aspect - with higher charges northbound in the morning peak and southbound in the evening peak. The charging hours and the variations between weekdays and weekends are also a reflection of the differing levels of demand which we need to manage. There is no charge at night between 22:00 and 06:00 as demand will be low. Demand is higher on weekdays in the period 06:00 to 10:00 northbound and 16:00 to 19:00 southbound so a peak charge will be applied, while in the periods of lower demand outside these hours on weekdays, and on weekends, an off-peak charge will apply.
- 5.5 The proposed user charges were developed so that they best meet the criteria as set out in the CPAP including the achievement of the Project Objectives, the equality impacts and other relevant considerations. The starting point for this was the Assessed Case user charges, and the process for updating and assessing this against the Project Objectives using the UCAF is explained in Section 4. We have sought to strike a balance between setting the charges too low – which could lead to an undermining of the Scheme benefits by attracting additional traffic to the crossing – and setting them too high, which could lead to diversions to alternative crossings.
- 5.6 Because all motorised vehicles contribute to congestion and have environmental impacts, all vehicle types are in scope for charging. Differential charging by vehicle type means that we can recognise that the impact on achievement of the Project Objectives and behavioural response to charges differs by vehicle type. In addition, all motorists will benefit from reduced congestion and journey times at the tunnels, so it is fair that everyone using the Silvertown and Blackwall tunnels pays, unless they are eligible for a discount or an exemption or are travelling by public transport.
- 5.7 We expect over 75 per cent of user charges to be paid via Auto Pay (based on our experience with the Congestion Charge and ULEZ), which has advantages for the customer in terms of removing the risk of incurring a penalty charge for non-

payment. In the Assessed Case, it was assumed that customers would be incentivised to register for Auto Pay by being charged £1 less than customers who were not registered. However, given changing circumstances in the period since the DCO examination – most user charge customers now use Auto Pay, a registration fee for signing up for Auto Pay no longer applies and an Auto Pay discount no longer applies for the Congestion Charge – a different approach to incentivising the use of Auto Pay for the tunnels user charges has been proposed. Customers registered for Auto Pay will pay off-peak charges outside peak charging hours, while customers not registered for Auto Pay will pay the peak charge rate during all charging hours irrespective of when they make their journeys. There are over 1.4 million people registered for Auto Pay at present and we expect this number to rise with the introduction of user charges at these tunnels.

- 5.8 Charges can be paid in advance and customers who are already registered for Auto Pay in respect of our existing road user charging schemes will not need to re-register. For customers who are not registered for Auto Pay, Penalty Charge Notices (PCNs) will be issued for non-payment, with a maximum of one PCN issued per charging day rather than per trip. For the initial user charges, the penalty charge level will be set at £180 (reduced to £90 if paid within two weeks); like the user charges, the penalty charge level may be varied in future subject to the policies and procedures set out in the CPAP.
- 5.9 We are also proposing to offer discounts and exemptions, as set out at Appendix 6, to certain people, vehicle types and journeys. Included within these is a low-income residents' discount and a discount for eligible small businesses, sole traders and charities registered in the host boroughs.
- 5.10 Policy 6 of the CPAP provides for concessions for eligible residents in the three host boroughs on a low income for the duration of the monitoring period. The Statement of Charges contains an east London low-income residents' discount of 50 per cent for eligible residents in 13 east London boroughs, for a minimum of three years. This complies with - and would be available to more people than - the commitment set out in Policy 6. We also proposed a business discount of £1 discount on off-peak user charges for at least 12 months. It will be available to eligible small businesses, sole traders and charities registered in the host boroughs. This discount was developed with regard to Requirement 21 of the DCO to provide businesses with transitional support and also the impact of a discount on the Project Objectives, in particular PO2 and PO3.

## **6 Achievement of the Project Objectives and wider policy context**

- 6.1 As set out in the CPAP, the achievement of the Project Objectives is critical to the setting of the user charges. The Project Objectives for the Scheme were developed as part of the DCO process. They are included in the CPAP which was certified by the Secretary of State and are reproduced in paragraph 3.4 above.
- 6.2 As noted in Section 4, the UCAF (at Appendix 4) describes how the proposed initial user charges meet each of the Project Objectives. In summary, the provision of the new Silvertown Tunnel in isolation (without user charging at both tunnels) would not solve the severe and long-standing problems of congestion, closures and lack of resilience at the Blackwall Tunnel. While the new tunnel does

bring additional capacity (as well as improved reliability and resilience), without user charges at both Silvertown and Blackwall tunnels the benefits would be short-lived. The consequential induced demand for the crossing brought about by this new capacity would lead to the undermining of these benefits. As more and more vehicles use the crossings, congestion and delay would quickly return (undermining PO1, PO2 and PO3).

- 6.3 Furthermore, without a user charge, the social and environmental impacts (air pollution from vehicles, for example) would not be managed (PO5 and PO6). User charges enable us to manage demand and the associated impacts so that the benefits of the new crossing endure over time, and support economic and population growth (PO3), which is also a benefit of the new cross-river bus routes. Finally, the user charges provide a stable and long-term means of paying for the costs of constructing the Silvertown Tunnel and of maintaining and operating both tunnels (PO7).

**Wider policy context: Mayor’s Transport Strategy (MTS), Traffic Management Act 2004, Equalities Act 2010 and other relevant legislation**

- 6.4 Policy 4 of the CPAP states that we must set and vary the user charges in accordance with applicable legislation, the MTS and other relevant policies. This has guided our approach to developing the user charges including the discounts and exemptions.
- 6.5 A Health and Equality Impact Assessment was submitted as part of the DCO application. As part of the updating of the proposed user charges and in line with our statutory Public Sector Equality Duty (PSED), in 2024 we undertook an Equality Impact Assessment (EqIA) which was available as one of the consultation documents. This has now been updated taking into account responses received in the consultation and is at Appendix 5, with a summary at Section 9 below.
- 6.6 With regard to the MTS, Proposal 93 is most relevant: The Mayor, through TfL, will continue to support the construction and operation of the Silvertown Tunnel, together with the introduction of user charges on the Blackwall and Silvertown tunnels (once the latter is opened), to address the problems of traffic congestion and associated air pollution, frequent closures and consequential delays, and the lack of network resilience and reliability at the Blackwall Crossing.
- 6.7 As set out in the UCAF, the total number of cross-river trips through both tunnels combined is not forecast to change significantly with the Scheme owing to the introduction of the user charges; we have also put in place public transport concessions and improved bus services as part of the Scheme, which means that there will be an increase in public transport trips, with improved reliability and journey time savings for customers. The user charges enable us to manage the traffic and environmental impacts of the Scheme in the long-term and, as described in Section 11, we will keep them under review and may propose changes from time to time. In this way, the proposals align with the traffic reduction and sustainable mode share aims of the MTS and, by providing better access to jobs, education and leisure opportunities, they also align with the Good Growth agenda in the MTS.

6.8 As part of the assessment of the user charges against the Project Objectives, the UCAF records the impacts on our other duties, including network management duties under the Traffic Management Act 2004, the PSED, and compliance with the air quality mitigation requirements of the DCO.

## **7 The consultation**

7.1 As noted above, between 10 July and 3 September 2024, we consulted members of the STIG, the public and other stakeholders on the proposed charge levels, discounts and exemptions. The Consultation Report is included at Appendix 2. Appendix A of that report, Response to Issues Raised, provides our response to the issues raised by consultees.

7.2 The consultation materials, including the table of proposed user charges, discounts and exemptions, the populated draft UCAF (draft because it was subject to consultation), the Supplementary Information and the proposed Statement of Charges, were available on our consultation portal<sup>5</sup>.

7.3 In total, we received 5,361 responses to the consultation, including 98 stakeholder responses, eleven STIG responses, 5,045 responses from the public, and three sets of organised campaign responses (comprising 207 individual responses). The following members of STIG made a response to the consultation: City of London; LB of Bexley; LB of Hackney; LB of Lewisham; LB of Newham; LB of Redbridge; LB of Southwark; LB of Tower Hamlets; LB of Waltham Forest, the Royal Borough of Greenwich and National Highways. No response was received from: the LB of Barking and Dagenham and the LB of Bromley. Chapter 4 of the Consultation Report summarises the STIG responses.

7.4 The Scheme was previously subject to a statutory consultation in 2015 and an examination in public by the Planning Inspectorate in 2016-2017, which considered the response to this statutory consultation. This was preceded by several non-statutory consultations.

### **Green and fair package of concessions and discounts**

7.5 Included within the consultation materials on the proposed charge levels and the discounts and exemptions for the initial user charges was information on the proposed green and fair package of concessions and discounts which complements the user charges. The package includes two user charge discounts: the east London low-income residents' discount and the business discount (available to eligible small businesses, sole traders and charities in the host boroughs, in respect of up to three vehicles) referred to in paragraph 5.10. They will be available for a minimum of three years and one year respectively. Additionally, the package includes elements for all Londoners: free pay as you go bus journeys for routes which cross the river using the tunnels (including the cycle shuttle-bus) and free pay as you go DLR journeys on certain cross-river routes for at least 12 months; and our longer-term plan to improve river crossings in east London.

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<sup>5</sup> <https://haveyoursay.tfl.gov.uk/tc-yourview>



- 7.6 The Board is asked to approve the east London low-income residents' discount and the business discount as part of the decision on setting the initial user charges and approving the Statement of Charges. The remainder of the green and fair package of concessions and discounts is being progressed separately. An update on the cross-river cycle shuttle-bus, new bus services and the bus and DLR concessions was provided to the Programmes and Investment Committee in October 2024.
- 7.7 In July 2024 we published a consultation report on the proposed cross-river cycle shuttle-bus service for the Silvertown Tunnel. This follows on from the consultation on the bus network proposals and report in March 2023, and both are available on our consultation webpage.

## 8 The Statement of Charges and the proposed final initial user charges

- 8.1 The DCO requires us to set out the user charges in a statement which must include various details associated with the imposition of charges such as the charging area, charging hours, vehicle categories, payment methods, discounts and exemptions and a summary of enforcement provisions. The proposed Statement of Charges was published with the consultation materials.
- 8.2 Having considered the responses from STIG, stakeholders and members of the public to the proposed charge levels, discounts and exemptions, we have updated the Statement of Charges for the initial charges at the Silvertown and Blackwall tunnels (as set out in Appendix 1). It is presented to the Board for approval and includes the following changes which are being suggested in response to issues raised in the consultation:
- (a) **User charges - re-classification of 'small van' and 'large van' user charges so that electric vans are within scope.** As originally drafted, the vehicle categories relied on in the Statement of Charges led to the unintentional effect that electric vans were either chargeable as large vans (but not small vans) or HGVs (rather than large vans) owing to the size and weight of the vehicle's battery. As a consequence, electric van owners would effectively have been penalised (by having to pay a higher charge) for choosing an electric van over a non-electric equivalent, making electric vans a less attractive option. To address this, the vehicle categories that small van and large van charges apply to have been expanded to expressly include specific electric vans.
  - (b) **Operational vehicle discount for host borough - inclusion of east London borough refuse vehicles.** Most vehicles that are within scope of this discount will not make cross-river trips. However, in recognition that some east London borough councils will have already entered into contracts for refuse services that use vehicles that do make these trips, we propose to change the eligibility for the existing public services discount to include vehicles used by east London borough councils for waste collection and disposal services.
- 8.3 Some other minor changes have also been made to the Statement of Changes including specifying that the charges will come into effect 56 days after the date

on which the Statement is published or when the Silvertown Tunnel opens for public use, whichever comes later. The version of the Statement of Charges that was consulted on provided for the date on which the charges would take effect to be specified in a London Gazette notice. As noted above, the user charges may only apply at the Silvertown and Blackwall tunnels from when the Silvertown Tunnel first opens for public use.

## **9 Equality implications**

- 9.1 TfL is subject to an ongoing duty, under section 149 of the Equality Act 2010 (known as the public sector equality duty), to have due regard to the need to:
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act;
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 9.2 The protected characteristics covered by section 149 of the Equality Act 2010 are: age, disability, gender reassignment, pregnancy and maternity, race, sex, religion or belief and sexual orientation, and in certain circumstances civil partnership or marriage. We have additionally considered the potential impacts on people who may be disadvantaged in London such as people on low incomes, carers, homeless people, and asylum seekers and refugees.
- 9.3 Our EqIA, which has been updated following the public consultation, is provided at Appendix 5. This identifies a number of potential negative impacts on people with protected characteristics and disadvantages which have been considered during the development of our proposed initial user charges. These impacts are considered to be minor requiring no further mitigations, or mitigated through the proposed discounts, exemptions and concessions proposed.
- 9.4 A potential disproportionate negative impact has been identified for Private Hire Vehicle (PHV) drivers on low incomes (a relatively high proportion of whom are of Asian ethnicity and Muslims) who do not own a Zero Emission Capable (ZEC) or wheelchair-accessible PHV. However, this impact is expected to diminish over time as vehicles are upgraded to ZEC vehicles to meet licensing requirements.
- 9.5 There is a risk that the user charges may impact on access to work and training for carers (voluntary, paid, informal and personal assistants) and care providers providing services cross-river. Changes to the provision of care could negatively impact disabled people, older people, homeless people, and asylum seekers and refugees. The proposed discounts, exemptions and concessions in addition to the improvements in cross-river accessibility are considered to mitigate this potential impact. However, we will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening as per policy 15 of the CPAP, described in Section 11 below.
- 9.6 People on low incomes may disproportionately experience a reduced ability to afford the user charges and associated change in travel patterns and social

networks created. However, the east London low-income residents' discount has been proposed, helping to offset the impact as well as the concessions provided as part of the green and fair package of concessions and discounts.

## 10 Financial Implications

10.1 Table 2 shows the latest operating account position with respect to the tunnels user charges.

**Table 2: Operating account position for the Tunnels user charges<sup>6</sup>**

	<b>Income Statement (£m)</b>	<b>Prior years</b>	<b>24/25</b>	<b>25/26</b>	<b>26/27</b>	<b>27/28</b>	<b>28/29</b>	<b>29/30</b>
A	<b>Revenue</b>	-	<b>3.1</b>	<b>103.8</b>	<b>111.0</b>	<b>115.4</b>	<b>119.5</b>	<b>123.7</b>
B	<b>Operating Costs</b>	<b>(0.2)</b>	<b>(18.1)</b>	<b>(106.7)</b>	<b>(107.9)</b>	<b>(111.4)</b>	<b>(116.2)</b>	<b>(120.6)</b>
C (A+ B)	<b>Net Contribution before renewals</b>	<b>(0.2)</b>	<b>(14.9)</b>	<b>(2.9)</b>	<b>3.0</b>	<b>4.0</b>	<b>3.3</b>	<b>3.1</b>
D	Silvertown Capital Renewals	(0.6)	(4.6)	(0.6)	-	-	-	-
E (C+ D)	<b>Net contribution (excl. Project Costs)</b>	<b>(0.9)</b>	<b>(19.5)</b>	<b>(3.4)</b>	<b>3.0</b>	<b>4.0</b>	<b>3.3</b>	<b>3.1</b>

10.2 The income captures revenue from user charges including net revenue from penalty charges. The income is adjusted by around six per cent to reflect discounted charges for vehicles and groups identified as part of the consultation<sup>7</sup>. Included within the operating costs are annual availability payments of around £70m per year due to our appointed contractor Riverlinx, and 2024/25 includes a £9m payment to them, agreed in 2020 and payable in January 2025, relating to the Safe Stop instruction during the pandemic.

10.3 In March 2021, the independent auditors Ernst & Young presented a report to our Audit and Assurance Committee<sup>8</sup> of their review of the governance process, business case and contractual arrangements for the Scheme, which concluded that the business case was well constructed and had been through an extensive governance process.

<sup>6</sup> The operating account reflects the working assumptions at the point of the draft submission of the GLA budget.

<sup>7</sup> Not included above is a circa £4m-£5m impact in 25/26 with respect to the £1 user charge discount offered in the first 12 months to small businesses who register for the local business discount. The expectation is that this impact will be funded by the GLA as part of overall funding for the green and fair package.

<sup>8</sup> [\(Public Pack\)Agenda Document for Audit and Assurance Committee, 17/03/2021 10:00 \(tfl.gov.uk\)](#)

## 11 Next Steps

### **The publication of the Statement of Charges**

- 11.1 If the Board approves the initial user charges as set out in the Statement of Charges and its publication, the Statement of Charges will be published shortly after the Board's decision and not less than 56 days in advance of tunnel opening (in accordance with article 54 of the DCO and Procedure 3 of CPAP).
- 11.2 TfL will be implementing a comprehensive multi-channel public information and awareness-raising campaign from early January 2025 to help local residents, businesses and drivers prepare for the tunnel opening.
- 11.3 Advertising will raise awareness of the opening date, journey benefits and the improved public transport services the tunnel will enable, including new bus services such as the new Superloop SL4 and the cross-river cycle shuttle-bus service. It will also include information on the user charges and how to register for Auto Pay to benefit from the reduced off-peak charge, as well as the various discounts and exemptions open to eligible low-income residents, small businesses, sole traders and charities. The campaign will appear across video on demand, radio, posters, local and specialist press, social media, online video, petrol pump nozzles, and online search, and these will be supported by detailed information on our website. Information will also be available in leaflets distributed via a door drop to residents living in thirteen boroughs in east London, face to face leafleting at high footfall locations like shopping centres and direct mailed to businesses in the three host boroughs of Greenwich, Newham and Tower Hamlets. We will also be sending emails to customers registered on the TfL database. Information will also be available in alternative languages for download from our website.
- 11.4 Ahead of pre-registration opening for low-income residents and businesses, sole traders and charities eligible for the discounts described above, customers visiting our website will be able to sign up to our database so they can be contacted once pre-registration opens to receive information about the tunnel and the discounts. This will be supported by a comprehensive stakeholder engagement programme, press releases and use of our social media channels. Roadside signage will be installed ahead of the tunnel opening with some temporary messaging ahead of the permanent signage information, to help provide further advance notice to drivers.

### **Review after a year of the user charges**

- 11.5 After 12 months' operation of the Scheme, we will undertake a review of the user charges to check the Scheme is performing broadly in accordance with the updated traffic forecasts used in the refreshed assessment. Policy 15 of the CPAP states that we must complete this review not later than 15 months after Scheme opening. The approach for this review is set out in Procedure 5 of the CPAP. Our proposed response to the review will be subject to consultation with STIG. This review will be informed by data from the monitoring regime put in place by the MMS.

### **Occasional variations for inflation**

- 11.6 The CPAP provides for occasional variations to the user charges to account for inflation, and Procedure 4 explains how this will be done. It is anticipated that the user charges will be varied from time to time for inflation based on a review which considers accepted indicators of inflation, the continued achievement of the Project Objectives and our other duties. The CPAP makes the relevant indicator of inflation the Retail Prices Index although it is being phased out and is expected to be replaced by the Consumer Price Index with Housing costs in 2030.
- 11.7 It is recommended that the Board authorises the Finance Committee to approve any future inflationary changes to the charge levels and associated charges (such as the penalty charge level).

### **Reviewing the user charges and future variations**

- 11.8 From tunnel opening, we will continue to monitor the impacts – traffic, socio-economic, noise and air quality – and implement any mitigations required, as set out in the MMS. We will also continue to monitor and develop the bus network, as set out in the Bus Strategy. STIG will continue to have a role in the three-year monitoring period and in future variations of the user charges (except for the occasional adjustments for inflation).
- 11.9 We will keep the charges under review and may propose variations from time to time in order to achieve the Project Objectives. This aligns with Policy 11 of the CPAP: TfL must keep the user charges under review, and will make variations to charges where this is considered necessary to ensure the continued achievement of the Project Objectives. It also aligns with Proposal 20 of the MTS: The Mayor, through TfL, will keep existing and planned road user charging schemes, including the Congestion Charge, Low Emission Zone, Ultra Low Emission Zone and the Silvertown Tunnel schemes, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy.
- 11.10 Procedure 2 of the CPAP describes how we will go about proposing variations to the user charges and how this entails the use of UCAF and consultation with STIG. Like the initial user charges, Procedure 2 states that the proposed variations will be submitted to the TfL Board for approval. It is recommended that the Board discharges its obligations in respect of variations to the user charges through the proposed delegation of authority to the Finance Committee.

### **List of appendices to this report:**

- Appendix 1: Statement of Charges (updated)
- Appendix 2: Consultation Report
- Appendix 3: Charging Policies and Procedures (CPAP)
- Appendix 4: User Charging Assessment Framework (UCAF)
- Appendix 5: Equality Impact Assessment (EqIA)
- Appendix 6: Table of discounts and exemptions

**List of background papers:**

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

Webpage recording engagement and decisions of STIG: <https://tfl.gov.uk/travel-information/improvements-and-projects/silvertown-tunnel-implementation-group>

Consultation and report on cross-river bus network:  
<https://haveyoursay.tfl.gov.uk/silvertown-tunnel-bus-network>

Consultation and report on cross-river cycling service:  
<https://haveyoursay.tfl.gov.uk/silvertown-cycling-service>

Silvertown Tunnel Order: <https://www.legislation.gov.uk/uksi/2018/574/contents>

Selection of certified documents and other related information:  
[Silvertown Tunnel permission - Transport for London \(tfl.gov.uk\)](#)

Certified documents held at the National Archive:  
<https://webarchive.nationalarchives.gov.uk/ukgwa/20221201131919/https://infrastructure.planninginspectorate.gov.uk/projects/london/silvertown-tunnel/>

Contact Officer: Alex Williams, Chief Customer and Strategy Officer  
Email: [alexwilliams@tfl.gov.uk](mailto:alexwilliams@tfl.gov.uk)

**THE SILVERTOWN TUNNEL ORDER 2018**  
**CHARGING POLICIES AND PROCEDURES**

The Blackwall and Silvertown Tunnels  
Statement of Charges

Whereas—

- (1) Transport for London is empowered by article 54 of The Silvertown Tunnel Order 2018 to levy charges in accordance with Part 5 of that Order in respect of motor vehicles using the Silvertown Tunnel or the Blackwall Tunnel;
- (2) Under article 53 of the Silvertown Tunnel Order 2018 Transport for London must exercise its functions under Part 5 of that Order in accordance with the charging policy set out in Schedule 14 of that Order (the Charging Policy) and certified by the Secretary of State, or any revision of that document approved by the Mayor of London;
- (3) The Charging Policy sets out a procedure for setting the initial charges for the use of the tunnels which includes consultation with the members of the Silvertown Tunnel Implementation Group;
- (4) Not later than 56 days before the charges are intended to take effect Transport for London is required to publish a statement of charges setting out, amongst other things, the charges imposed and the times at which charges will be payable, classification of motor vehicles for the purposes of determining the charges payable, discounts and exemptions from charges, payment methods and a summary of enforcement provisions;
- (5) Transport for London has completed the process for setting the initial charges in accordance with the Charging Policy and intends to impose charges for the use of the Silvertown Tunnel and Blackwall Tunnel from the date when the Silvertown Tunnel is first opened for public use.

Now, therefore, Transport for London, in exercise of the powers conferred on it by article 54(1) to (3) of the Silvertown Tunnel Order 2018 and in compliance with the duties imposed on it by article 53 and 54(5) and (6) of that Order, and of all other powers enabling it in that behalf, hereby makes the following Statement of Charges which shall have effect on the later of the expiration of 56 days from the publication of this Statement of Charges or the date when the Silvertown Tunnel is first opened for public use.

# STATEMENT OF CHARGES

## Interpretation

### 1.—(1) In this Statement of Charges—

- (a) “1994 Act” means the Vehicle Excise and Registration Act 1994;
- (b) “ambulances” has the meaning given in Annex II.A of Council Directive 70/156/EEC;
- (c) “bank holiday” means Christmas Day, Good Friday, New Year’s Day and any day which is a bank holiday in England and Wales specified by or appointed in accordance with section 1 of the Banking and Financial Dealings Act 1971;
- (d) “the Blackwall Tunnel” has the meaning given by article 2 of the Order;
- (e) “CC Auto Pay Account” has the meaning given by article 6A of the Scheme contained in the Schedule to the Greater London (Central Zone) Congestion Charging Order 2004 as amended;
- (f) “charge” means a charge imposed by article 6 except to the extent that this Statement of Charges otherwise provides or that context otherwise requires;
- (g) “chargeable vehicle” has the meaning given by article 3;
- (h) “charging hours” means the off-peak hours and the peak hours on any charging day;
- (i) “charging day” means the period of twenty four hours from midnight to midnight on any day except Christmas Day, and “charging day concerned” means the charging day on which a vehicle is used within the tunnels during charging hours;
- (j) “Class” in relation to any vehicle shall be construed in accordance with sub-paragraphs (k) to (s) below;
- (k) “Class L” comprises vehicles falling within categories L1e, L2e, L3e, L4e L5e, L6e and L7e as defined in Article 1 of Council Directive 2002/24/EC;
- (l) “Class M<sub>1</sub>” comprises vehicles designed and constructed to have not more than eight seats in addition to the drivers seat and intended for the carriage of passengers;
- (m) “Class M<sub>2</sub>” comprises vehicles designed and constructed to have more than eight seats in addition to the drivers seat and intended for the carriage of passengers, and having a maximum mass not exceeding 5,000 kilograms;
- (n) “Class M<sub>3</sub>” comprises vehicles designed and constructed to have more than eight seats in addition to the drivers seat and intended for the carriage of passengers, and having a maximum mass exceeding 5,000 kilograms;
- (o) “Class N<sub>1</sub> sub-class (i)” comprises:
  - (i) ambulances and hearses having a maximum mass exceeding 2,500 kilograms and which, applying item 2 of Appendix 1, Annex XI, Council Directive 70/156/EEC, would be treated as Class N<sub>1</sub> sub-class (ii) vehicles for emissions purposes;
  - (ii) motor caravans having a maximum mass exceeding 2,500 kilograms; and
  - (iii) vehicles designed and constructed for the carriage of goods,in each case having a reference mass not exceeding 1,305 and a maximum mass not exceeding 3,500 kilograms;
- (p) “Class N<sub>1</sub> sub-class (ii)” comprises:
  - (i) ambulances and hearses having a maximum mass exceeding 2,500 kilograms and which, applying item 2 of Appendix 1, Annex XI, Council Directive 70/156/EEC, would be treated as Class N<sub>1</sub> sub-class (ii) vehicles for emissions purposes;
  - (ii) motor caravans having a maximum mass exceeding 2,500 kilograms; and
  - (iii) vehicles designed and constructed for the carriage of goods,in each case having a reference mass exceeding 1,305 kilograms but not exceeding 1,760 kilograms and a maximum mass not exceeding 3,500 kilograms;



- (q) “Class N<sub>1</sub> sub-class (iii)” comprises:
- (i) ambulances and hearses having a maximum mass exceeding 2,500 kilograms and which, applying item 2 of Appendix 1, Annex XI, Council Directive 70/156/EEC, would be treated as Class N<sub>1</sub> sub-class (iii) vehicles for emissions purposes;
  - (ii) motor caravans having a maximum mass exceeding 2,500 kilograms; and
  - (iii) vehicles designed and constructed for the carriage of goods,
- in each case having a reference mass exceeding 1,760 kilograms and a maximum mass not exceeding 3,500 kilograms;
- (r) “Class N<sub>2</sub>” comprises:
- (i) ambulances and hearses which, applying item 2 or item 41 of Appendix 1, Annex XI, Council Directive 70/156/EEC, would be treated as Class N<sub>2</sub> vehicles for emissions purposes;
  - (ii) motor caravans; and
  - (iii) vehicles designed and constructed for the carriage of goods,
- in each case having a maximum mass exceeding 3,500 kilograms but not exceeding 12,000 kilograms;
- (s) “Class N<sub>3</sub>” comprises:
- (i) ambulances and hearses which, applying item 41 of Appendix 1, Annex XI, Council Directive 70/156/EEC, would be treated as Class N<sub>3</sub> vehicles for emissions purposes;
  - (ii) motor caravans; and
  - (iii) vehicles designed and constructed for the carriage of goods,
- in each case having a maximum mass exceeding 12,000 kilograms;
- (t) “disabled person’s badge” means any badge issued, or having effect as if issued, to an individual or to an institution under regulations for the time being in force under section 21 of the Chronically Sick and Disabled Persons Act 1970 or under section 14 of the Chronically Sick and Disabled Persons (Northern Ireland) Act 1978 and references to the holder of such a badge are to the individual to whom or, as the case may be, the institution to which the badge is issued;
- (u) “discounted vehicle” means:
- (i) a 100% discounted vehicle;
  - (ii) a qualifying local resident’s vehicle within the meaning of paragraph 11 of Annex 1;
  - (iii) a qualifying small business vehicle within the meaning of paragraph 15 of Annex 1;
  - (iv) a qualifying charity vehicle within the meaning of paragraph 15 of Annex 1;
- (v) “EEA State” means a state which is a contracting Party to the EEA Agreement;
- (w) “electric van” means an electric vehicle of Class N<sub>1</sub> sub-class (ii) or Class N<sub>2</sub>;
- (x) “electric vehicle” means a vehicle that Transport for London is satisfied—
- (i) operates wholly by means of an electrically powered propulsion system that draws its motive power from either a hydrogen fuel cell or from a battery that can be fully recharged from an external source of electricity and has tailpipe CO<sub>2</sub> emissions of 0 grams per kilometre; and
  - (ii) is registered in the GB or NI records or, in the case of a vehicle registered in a country other than the United Kingdom in the appropriate records of that country, as an electrically propelled vehicle;
- (y) “hearses” has the meaning given in Annex II.A of Council Directive 70/156/EEC;

- (z) “LEZ Auto Pay Account” means an “Auto Pay Account” as defined in article 10 of the Scheme contained in the Schedule to the Greater London Low Emission Zone Charging Order 2006 as amended;
- (aa) “maximum mass” in relation to a vehicle means the technically permissible maximum laden mass as specified by the manufacturer;
- (bb) “northbound” means, in relation to a vehicle using the tunnels, entering the tunnels on the south side of the River Thames or exiting the tunnels on the north side of the River Thames;
- (cc) “off-peak hours” means the hours on any charging day falling outside peak hours;
- (dd) “the Order” means The Silvertown Tunnel Order 2018;
- (ee) “outstanding” in relation to a penalty charge shall be construed in accordance with regulation 11(2) of the Road User Charging (Charges and Penalty Charges) (London) Regulations 2001;
- (ff) “peak hours” means—
  - (i) in respect of a vehicle travelling northbound, the hours between 06.00 am and 10.00 am on a charging day other than a Saturday, Sunday or bank holiday;
  - (ii) in respect of a vehicle travelling southbound, the hours between 04.00 pm and 07.00 pm on a charging day other than a Saturday, Sunday or bank holiday;
- (gg) “penalty charge” has the meaning given in regulation 2(1) of the Road User Charging (Charges and Penalty Charges) (London) Regulations 2001;
- (hh) “reference mass” in relation to a vehicle means the mass of the vehicle with bodywork and, in the case of a towing vehicle, with coupling device, if fitted by the manufacturer, in running order, or mass of the chassis or chassis with cab, without bodywork and/or coupling device if the manufacturer does not fit the bodywork and/or coupling device (including liquids and tools, and spare wheel if fitted, and with the fuel tank filled to 90% and the other liquid containing systems, except those for used water, to 100% of the capacity specified by the manufacturer), increased by a uniform mass of 100 kilograms;
- (ii) “register” means the register of exempt and discounted vehicles to be maintained by Transport for London under article 10;
- (jj) “registered in the GB or NI records” in relation to a vehicle means that the vehicle is registered under section 21 of the 1994 Act in the register which is maintained on behalf of the Secretary of State by the Driver and Vehicle Licensing Agency;
- (kk) “registered keeper” means—
  - (i) in relation to a vehicle registered in the United Kingdom, the person in whose name the vehicle is registered under the 1994 Act; or
  - (ii) in relation to any other vehicle, the person by whom the vehicle is kept;
- (ll) “relevant district” means one of the following local authority areas—
  - (i) the Royal Borough of Greenwich;
  - (ii) the London Boroughs of Barking and Dagenham, Bexley, Bromley, Hackney, Havering, Lewisham, Newham, Redbridge, Southwark, Tower Hamlets or Waltham Forest;
  - (iii) the City of London;
- (mm) “the Silvertown Tunnel” has the meaning given by article 2 of the Order;
- (nn) “southbound” means, in relation to a vehicle using the tunnels, entering the tunnels on the north side of the River Thames or exiting the tunnels on the south side of the River Thames;
- (oo) “taxi” means a vehicle licensed as a hackney carriage under section 6 of the Metropolitan Public Carriage Act 1869;
- (pp) “tunnels” means—
  - (i) the Silvertown Tunnel or any part of it; and
  - (ii) the Blackwall Tunnel or any part of it.

- (2) In this Statement of Charges—
- (a) a reference in any provision to an instrument of the European Community is to that instrument as amended at the date on which this Statement of Charges comes into effect;
  - (b) a reference in any provision to an authorised person is to a person authorised by Transport for London for the purposes of that provision and different persons may be authorised for the purposes of different provisions; and
  - (c) where a person has been authorised to act on behalf of Transport for London in relation to any matter a reference to Transport for London shall be taken to include a reference to that person.
- (3) For the purposes of this Statement of Charges—
- (a) a sum of money shall be taken to have been paid on the date on which payment is received by Transport for London; and
  - (b) the number of seats of a vehicle shall be taken to be the same as the seating capacity of the vehicle calculated in accordance with the principles set out in regulation 44 of the Road Vehicles (Registration and Licensing) Regulations 2002.

### **Tunnels subject to charge**

2. The Silvertown Tunnel and the Blackwall Tunnel (the tunnels) are hereby designated as the area in respect of which charges apply.

### **Classes of vehicles subject to charge**

3.—(1) A chargeable vehicle is a motor vehicle falling within a specified class that is not an exempt vehicle.

- (2) The classes specified for the purposes of paragraph (1) are—
- (a) Class L;
  - (b) Class M<sub>1</sub>;
  - (c) Class M<sub>2</sub>;
  - (d) Class M<sub>3</sub>;
  - (e) Class N<sub>1</sub> sub-class (i);
  - (f) Class N<sub>1</sub> sub-class (ii);
  - (g) Class N<sub>1</sub> sub-class (iii);
  - (h) Class N<sub>2</sub>; and
  - (i) Class N<sub>3</sub>.

### **Exempt vehicles**

4. A vehicle is an exempt vehicle for the purposes of use within the tunnels if—
- (a) the vehicle falls within one of the classes of vehicles specified in Part 1 of Annex 1; and
  - (b) particulars of the vehicle are for the time being entered in the register.

### **Discounts**

5. A vehicle is a discounted vehicle for the purposes of use within the tunnels if—
- (a) the vehicle falls within one of the classes of vehicles identified in Part 2 of Annex 1; and
  - (b) particulars of the vehicle are for the time being entered in the register.

### **Imposition of charges**

6.—(1) A charge in accordance with paragraph (2) is imposed each time a chargeable vehicle is used within the tunnels or any part of them during charging hours.

(2) Subject to the following provisions of this Statement of Charges—

- (a) a charge of an amount specified in article 7(1)(a) is imposed in respect of any chargeable vehicle of Class L;
- (b) a charge of an amount specified in article 7(1)(b) is imposed in respect of any chargeable vehicle of Class M<sub>1</sub>, Class N<sub>1</sub> sub-class (i), or any electric van of Class N<sub>1</sub> sub-class (ii);
- (c) a charge of an amount specified in article 7(1)(c) is imposed in respect of—
  - (i) any chargeable vehicle of Class N<sub>1</sub> sub-class (ii) except for an electric van;
  - (ii) any chargeable vehicle of Class N<sub>1</sub> sub-class (iii); or
  - (iii) any electric van of Class N<sub>2</sub> having a maximum mass not exceeding 4,250 kilograms;
- (d) a charge of an amount specified in article 7(1)(d) is imposed in respect of any chargeable vehicle of Class N<sub>2</sub> or Class N<sub>3</sub>;
- (e) a charge of an amount specified in article 7(1)(e) is imposed in respect of any chargeable vehicle of Class M<sub>2</sub> or Class M<sub>3</sub>.

### **Amount of charges**

7.—(1) Subject to paragraphs (2) to (5)—

- (a) the amount of the charge imposed by article 6(2)(a) shall be—
  - (i) when paid by Auto Pay, £2.50 during peak hours or £1.50 during off-peak hours;
  - (ii) when paid otherwise than by Auto Pay, £2.50;
- (b) the amount of the charge imposed by article 6(2)(b) shall be—
  - (i) when paid by Auto Pay, £4.00 during peak hours or £1.50 during off-peak hours;
  - (ii) when paid otherwise than by Auto Pay, £4.00;
- (c) the amount of the charge imposed by article 6(2)(c) shall be—
  - (i) when paid by Auto Pay, £6.50 during peak hours or £2.50 during off-peak hours;
  - (ii) when paid otherwise than by Auto Pay, £6.50;
- (d) the amount of the charge imposed by article 6(2)(d) shall be—
  - (i) when paid by Auto Pay, £10.00 during peak hours or £5.00 during off-peak hours;
  - (ii) when paid otherwise than by Auto Pay, £10.00;
- (e) the amount of the charge imposed by article 6(2)(e) shall be—
  - (i) when paid by Auto Pay, £4.00 during peak hours or £1.50 during off-peak hours
  - (ii) when paid otherwise than by Auto Pay, £4.00.

(2) Subject to paragraph (3) no charge shall be imposed in respect of any chargeable vehicle that is a 100% discounted vehicle provided particulars of the vehicle appear in the register.

(3) In the case of a vehicle falling within paragraphs 7, 8, 9, 10 or sub-paragraphs 6(5) and 6(6) of Annex 1, any charge imposed by article 6 shall be refunded in accordance with those paragraphs or sub-paragraphs.

(4) The amount of charge applicable in respect of a qualifying local resident's vehicle shall be 50% of the charge imposed by paragraph (1).

(5) The amount of charge applicable in respect of a qualifying small business vehicle or a qualifying charity vehicle during off-peak hours when paid by Auto Pay shall be £1 less than the charge imposed by paragraph (1).

## Payment of charges

8.—(1) A charge imposed by article 6 shall be paid in accordance with the provisions of this article.

(2) Except in a case where paragraph (8) applies a charge shall be paid in respect of a particular vehicle.

(3) A vehicle referred to in paragraph (2) shall be identified by its registration mark; and—

(a) the payer of a charge shall specify to Transport for London the registration mark of the vehicle in respect of which that charge is paid;

(b) a charge shall not be applicable to any vehicle having a registration mark different from the mark so specified.

(4) A charge payable other than by Auto Pay or in accordance with an agreement under paragraph (8) may only be paid—

(a) on a day falling within the period of 64 consecutive charging days immediately preceding the charging day concerned;

(b) on that charging day;

(c) on or before the third day after that charging day.

(5) Charges imposed by this Statement of Charges shall be paid as set out in paragraphs (a) and (b) below, by such means as Transport for London shall from time to time specify on its web-site, or by such other means as Transport for London may in the particular circumstances of the case accept:

(a) charges payable by fleet operators in accordance with an agreement under paragraph (8), by direct debit;

(b) other charges—

(i) by call centre;

(ii) by App;

(iii) on-line;

(iv) by Auto Pay.

(6) For the purposes of this paragraph and paragraphs (5) and (7)—

(a) a charge is paid by call centre if it is paid by such payment method as Transport for London may accept through the call centre provided for the purpose by Transport for London;

(b) a charge is paid by App if it is paid by such payment method as Transport for London may accept through a software application, for use on an electronic device, provided for that purpose by Transport for London;

(c) a charge is paid on-line if it is paid by such payment method as Transport for London may accept through the web-site provided for the purpose by Transport for London;

(d) a charge is paid by Auto Pay if it is paid in accordance with the provisions of article 9;

(e) “credit or debit card” means—

(i) “Visa”, “MasterCard”, “Delta”, “Maestro”; or

(ii) any other credit or debit card the name of which is for the time being published by Transport for London on its web-site as being acceptable to it;

(f) Transport for London will accept a payment if it is made by a method which is for the time being specified by Transport for London on its web-site as being acceptable to it.

(7) Where a charge is paid otherwise than by cash and payment is not received by Transport for London (whether because a direct debit, credit card or debit card payment or other payment method is declined, or otherwise), the charge shall be treated as not paid.

(8) Notwithstanding paragraph (2), a fleet operator which has entered into an agreement with Transport for London may pay charges imposed by article 6 which, to the extent provided for in that agreement, cover the use of any chargeable vehicle specified in the agreement on any charging day within a period so specified.

(9) An agreement under paragraph (8) shall be on such terms as Transport for London may in each case determine but a vehicle shall not be specified as mentioned in paragraph (8)—

(a) unless it is a chargeable vehicle controlled and managed by the fleet operator for the purposes of a business which is carried on by the operator or by a person to whom the operator is a contractor and the minimum number of motor vehicles is so specified in relation to that business; or

(b) if the vehicle is a specified vehicle under article 9.

(10) In this article—

(a) "fleet operator" means a person who—

(i) controls and manages the minimum number of motor vehicles used for the purposes of a business carried on by that person, whether or not those vehicles are owned or driven by that person; or

(ii) is a contractor employed by another person to control and manage the minimum number of motor vehicles for the purposes of a business carried on by that person, whether or not the vehicles are owned or driven by that other person; and

(b) "the minimum number" is 6 or more.

### **Auto Pay**

9.—(1) A charge is paid by Auto Pay where the conditions set out in paragraph (2) are met.

(2) The conditions referred to in paragraph (1) are—

(a) that the charge concerned relates to an Auto Pay Account that has been registered with Transport for London;

(b) that the Auto Pay Account concerned has not been suspended or cancelled under paragraph (8);

(c) that the chargeable vehicle concerned was on the charging day concerned a specified vehicle in relation to the Auto Pay Account concerned; and

(d) that on the billing day payment in relation to the Auto Pay Account concerned is made to Transport for London in accordance with paragraph (7).

(3) An application for registration for an Auto Pay Account—

(a) may only be made by a person of 18 years of age or over at the date of that application;

(b) shall include details of—

(i) the credit or debit card from which Transport for London may take payment for charges under paragraphs (7) and (8); or

(ii) the bank account from which Transport for London may take payment by direct debit for charges under paragraphs (7) and (8);

(iii) any CC Auto Pay Account or LEZ Auto Pay Account held by the applicant;

(c) shall be made by such means as Transport for London may accept;

(d) shall include all such other information as Transport for London may reasonably require, and Transport for London may refuse such an application where the applicant has previously registered for an Auto Pay Account, a CC Auto Pay Account or a LEZ Auto Pay Account that has subsequently been suspended or cancelled under paragraph (8), article 6A(8) of Scheme contained in the Schedule to The Greater London (Central Zone) Congestion Charging Order 2004 as amended or article 10(8) of the Scheme contained in the Schedule to the Greater London Low Emission Zone Charging Order 2006 as amended, or in such other circumstances as Transport for London may determine.

(4) A vehicle is a specified vehicle under paragraph (2)(c) if particulars of the vehicle are entered on the register of specified Auto Pay vehicles.

(5) An application to enter particulars of a vehicle or vehicles on the register of specified Auto Pay vehicles—

(a) shall identify the Auto Pay Account in relation to which the vehicle or vehicles are to be registered;

(b) shall include all such other information as Transport for London may reasonably require; and

(c) shall be made by such means as Transport for London may accept,

provided that the maximum number of specified vehicles registered in relation to any Auto Pay Account shall be five, or such other number as Transport for London may determine and publish on its web-site.

(6) No vehicle may be a specified vehicle in relation to more than one Auto Pay Account.

(7) Transport for London shall on the billing day take the automatic payment from—

- (a) the credit or debit card specified under paragraph (3)(b) or such other credit or debit card as Transport for London may in the particular circumstances of the case accept; or
- (b) by way of direct debit from the bank account specified under paragraph (3)(b) or such other bank account as Transport for London may in the particular circumstances of the case accept.

(8) Where payment under paragraph (7) is declined for any reason—

- (a) Transport for London may accept payment by any other means it considers suitable in the particular circumstances of the case; and
- (b) where all outstanding charges under paragraph (7) are not paid within such period as Transport for London may specify Transport for London may suspend or cancel the Auto Pay Account to which those charges relate.

(9) In this article—

- (a) the “automatic payment” means in respect of each Auto Pay Account a payment comprising the costs of each charge imposed under article 6 in respect of each specified vehicle that is a chargeable vehicle registered to that Auto Pay Account that have been incurred and that Transport for London has identified as being payable during the billing period immediately preceding the billing period within which the billing day concerned falls;
- (b) “billing day” in respect of any billing period means a day falling no earlier than 5 working days after the last day of that billing period or such other day as Transport for London may in the particular circumstances of the case determine on which Transport for London shall take the automatic payment under paragraph (7);
- (c) “Auto Pay Account” means an agreement (which may be the same agreement as any CC Auto Pay Account or LEZ Auto Pay Account held by the applicant) entered into with Transport for London for the purposes of paying charges imposed under article 6 in arrears by recurring credit or debit card payment;
- (d) “billing period” in relation to an Auto Pay Account means a period of one month or such other period as Transport for London may determine and specify on its web-site in each case beginning with the day on which Transport for London accepts an application for the registration of an Auto Pay Account or such other day as Transport for London may in the particular circumstances of the case accept;
- (e) “credit or debit card” means any credit or debit card the name of which is for the time being published by Transport for London on its web-site as being acceptable to it for the purpose of payment by Auto Pay; and
- (f) “register of specified Auto Pay vehicles” means a register maintained by Transport for London of those vehicles in respect of which a successful application for registration has been made under paragraph (5).

(10) An Auto Pay Account shall be subject to such terms as Transport for London shall determine, provided that it does not conflict with the provisions of this article.

## Register of exempt and discounted vehicles

10.—(1) Transport for London shall maintain a register of exempt and discounted vehicles (“the register”) for the purposes of articles 4 and 5 and Annex 1 to this Statement of Charges which require particulars of such vehicles to be entered in the register.

(2) Particulars of a vehicle shall be removed from the register—

- (a) in the case of a vehicle registered under paragraph 5 of Annex 1 in relation to the holder of a disabled person's badge, when that person ceases to be an eligible person for the purposes of that paragraph;
- (b) in the case of any other vehicle, immediately following the last day of the registration period, unless Transport for London renews the registration for a further period on application to it;
- (c) in the case of any vehicle other than a qualifying local resident's vehicle or a vehicle registered under paragraph 5 of Annex 1 in relation to the holder of a disabled person's badge, at the end of the period of 7 working days beginning with the day on which a change in the keeper of the vehicle occurred, unless Transport for London renews the registration for a further period on application to it.

(3) An application to enter particulars of a vehicle on the register—

- (a) shall include all such information as Transport for London may reasonably require;
- (b) shall be made by such means as Transport for London may accept;
- (c) if received later than the fifty-fifth working day of the application period shall be treated as an application to register the vehicle for a registration period beginning—
  - (i) with the first day of the registration period applied for; or
  - (ii) a subsequent day determined by Transport for London being not later than the tenth working day falling after the day on which the application was received; and
- (d) if received earlier than the first day of the application period shall not be valid unless Transport for London decides to treat the application as made on that day.

(4) Where the registered keeper of a vehicle or a qualified resident in relation to whom particulars of a vehicle are entered in the register is aware that the vehicle has ceased or will cease to fall within a class of discounted or exempt vehicles the registered keeper or, as the case may be, the qualified resident, shall notify Transport for London of the fact and Transport for London may remove the particulars of the vehicle from the register forthwith, or from the date notified to Transport for London as the date on which it will cease to be such a vehicle.

(5) If Transport for London is no longer satisfied that a vehicle is a discounted or exempt vehicle, it shall—

(a) notify—

- (i) in the case of a qualifying local resident's vehicle, the qualified resident in relation to whom the vehicle was registered;
- (ii) in the case of a vehicle which has been specified under paragraph 5 of Annex 1 in relation to an eligible person, that eligible person; or
- (iii) in any other case, the registered keeper

of its intention to remove the particulars of the vehicle from the register; and

(b) thereafter remove the particulars of the vehicle from the register.

(6) In this article—

(a) "application period" means, subject to paragraph (7), the period of 65 working days ending—

- (i) in the case of an application to renew a registration, with the charging day following the last day of the registration period; or



(ii) in the case of any other application with the first day of the registration period applied for;

(b) "registration period" means, subject to paragraph (7), the period of 12 months (or such longer period not exceeding 15 months as Transport for London may in any class of case determine for the purpose of staggering the renewal of registrations) beginning with the day on which particulars of a vehicle are entered in the register or, as the case may be, the registration is renewed.

(7) Where particulars of a qualifying local resident's vehicle are entered in the register in relation to a qualified resident who is the holder of a certificate of eligibility issued under paragraph 14 of Annex 1, the registration period shall be the period beginning with the day on which particulars of the vehicle are entered in the register and ending with the day on which the certificate of eligibility ceases to have effect in accordance with paragraph 14(3) of Annex 1.

(8) The first day of a registration period shall be a charging day.

(9) Nothing in this article shall prevent the making of a fresh application for particulars of a vehicle to be entered in the register after they have been removed from it in accordance with any provision of this article.

### **Penalty charge for non-payment of charge**

**11.**—(1) A penalty charge shall be payable for each charging day as respects which—

(a) a chargeable vehicle has been used within the tunnels in circumstances in which a charge is imposed by article 6; and

(b) any charge imposed by article 6 has not been paid in full in the manner in which and within the time by which it is required to be paid by article 8.

(2) A penalty charge payable by virtue of paragraph (1) shall be paid within the period ("the payment period") of 28 days beginning with the date on which a penalty charge notice is served under regulation 12 of the Road User Charging (Enforcement and Adjudication) (London) Regulations 2001 in respect of the penalty charge and in a manner specified in the penalty charge notice.

(3) The amount of a penalty charge payable in accordance with paragraph (1) shall £180 but, if the penalty charge is paid before the end of the fourteenth day of the payment period, the amount shall be reduced by one half to £90.

(4) Where a charge certificate is issued in accordance with regulation 17(1) of the Road User Charging (Enforcement and Adjudication) (London) Regulations 2001, the amount of the penalty charge to which it relates shall be increased by one half to £270.

### **Removal of vehicles**

**12.**—(1) This article applies where an authorised person has reason to believe that there are at least 3 penalty charges outstanding in relation to a chargeable vehicle which is stationary within the tunnels.

(2) Where this article applies, the authorised person or a person acting under the authorised person's direction, may remove the vehicle and deliver it to Transport for London or to a person authorised by Transport for London to keep vehicles so removed (a "custodian").

(3) Where a vehicle has been removed and delivered into the custody of a custodian in accordance with paragraph (2), Transport for London or the custodian may (whether or not any claim is made under regulation 15 or 16 of the Road User Charging (Charges and Penalty Charges) (London) Regulations 2001) recover from the person who was the owner of the vehicle when the vehicle was removed—

(a) all penalty charges that are outstanding in relation to the vehicle;

(b) a penalty charge of £200 for its removal;

(c) a penalty charge of £40 for each complete day or part of a day on which it has been held by Transport for London or a custodian; and

(d) if the vehicle has been disposed of, a penalty charge of £70 for its disposal.

**Commencement and duration of charges**

**13.** This Statement of Charges has effect from the later of the expiration of 56 days from the publication of this Statement of Charges or the date when the Silvertown Tunnel is first opened for public use, and shall remain in force indefinitely.

PART 1 – EXEMPT VEHICLES

- 1.—(1) The following classes of vehicle are specified for the purposes of article 4—
- (a) any vehicle which belongs to any of Her Majesty’s forces or is in use for the purposes of any of those forces;
  - (b) any vehicle that Transport for London is satisfied is used for naval, military or air force purposes and not registered under the 1994 Act, while it is being used within the tunnels by a member of a visiting force or a member of a headquarters or organisation;
  - (c) a vehicle registered in the GB or NI records which is an exempt vehicle for the purposes of the 1994 Act by virtue of its falling within any of the following paragraphs of Schedule 2 to that Act and for which a nil licence is in force—
    - (i) paragraph 3A (police vehicles);
    - (ii) paragraphs 4 and 5 (fire engines etc.);
    - (iii) paragraphs 6, 7 and 8 (ambulances and health service vehicles);
    - (iv) paragraph 11 (lifeboat vehicles);
    - (v) paragraphs 18, 19 and 20 (certain vehicles used by or for the carriage of disabled persons);
  - (d) a vehicle registered under legislation relating to the registration of vehicles in a member State that Transport for London is satisfied, had the vehicle been registered under the 1994 Act, would have been an exempt vehicle under paragraph 6 (ambulances), 18 (invalid vehicles) or 20 (vehicles used for the carriage of disabled people by a recognised body).
- (2) In this paragraph “member of a visiting force” and “member of a headquarters or organisation” have the meaning given in paragraph 1(2) of Schedule 5 to the Road Vehicles (Registration and Licensing) Regulations 2002.

PART 2 - DISCOUNTED VEHICLES Article 5

**Recovery and breakdown vehicles**

- 2.—(1) A recovery or breakdown vehicle is a 100% discounted vehicle provided particulars of the vehicle are entered in the register.
- (2) In this paragraph—
- (a) “breakdown vehicle” means a vehicle which is—
    - (i) constructed, adapted or equipped to provide roadside assistance or recovery services and in use to provide such services; and
    - (ii) operated by an accredited recovery organisation;
  - (b) “accredited recovery organisation” means an organisation accredited—
    - (i) by a certified accreditation body as operating to ISO 9001:2008 in accordance with the Specification for the application of ISO 9001:2008 to quality management systems in the Roadside Assistance and Recovery Industry published by the British Standards Institution or any British Standard or Specification for the time being replacing or amending the same; or
    - (ii) by a certified accreditation body in an EEA State to an equivalent specification published by a national standards body in an EEA State;

- (c) “certified accreditation body” means a body that is certified by the UK Accreditation Service to undertake audits in accordance with ISO 9001:2008 or an equivalent body in an EEA State; and
- (d) “recovery vehicle” means—
  - (i) a vehicle licensed as a recovery vehicle under paragraph 5 of Schedule 1 to the 1994 Act; or
  - (ii) a vehicle registered under legislation relating to the registration of vehicles in an EEA State as respects which Transport for London is satisfied that, had it been registered under the 1994 Act, it would have fallen to be licensed as a recovery vehicle under paragraph 5 of Schedule 1 to the 1994 Act.

### **Buses, coaches and minibuses**

**3.**—(1) A bus, coach or minibus is a 100% discounted vehicle provided particulars of the vehicle are entered in the register.

(2) In this paragraph “bus, coach or minibus” means any vehicle of Class M<sub>2</sub> or Class M<sub>3</sub>.

### **Taxis and private hire vehicles**

**4.**—(1) A taxi is a 100% discounted vehicle provided particulars of the vehicle are entered in the register.

(2) A qualifying private hire vehicle is a 100% discounted vehicle provided particulars of the vehicle are entered in the register on the application of the operator and the conditions specified in sub-paragraph (5) are met.

(3) A vehicle is a qualifying private hire vehicle if it is—

- (a) a designated wheelchair-accessible private hire vehicle; or
- (b) a zero-emission capable private hire vehicle.

(4) A private hire vehicle is zero-emission capable if it meets the requirements in sub-paragraphs (a) or (b) below:

(a) it is a private hire vehicle that is capable of being operated with zero exhaust emissions for a minimum range of 10 miles and is either—

- (i) registered in the GB or NI records on the basis of a UK registration document or a UK approval certificate or, in the case of a vehicle registered in a country other than the United Kingdom, in the appropriate records of that country on the basis of an equivalent registration document or EC certificate of conformity or equivalent certificate issued by the appropriate national authority, that specifies a CO<sub>2</sub> emissions figure for that vehicle of 50 grams per kilometre or less; or
- (ii) certified by the appropriate national approval authority as emitting 50 grams or less of CO<sub>2</sub> per kilometre when tested according to the procedure described in Annex 8 of United Nations Economic Commission for Europe (UNECE) Regulation 101;

(b) it is a private hire vehicle that is capable of being operated with zero exhaust emissions for a minimum range of 20 miles and is either—

- (i) registered in the GB or NI records on the basis of a UK registration document or a UK approval certificate or, in the case of a vehicle registered in a country other than the United Kingdom, in the appropriate records of that country on the basis of an equivalent registration document or EC certificate of conformity or equivalent certificate issued by the appropriate national authority, that specifies a CO<sub>2</sub> emissions figure for that vehicle of 75 grams per kilometre or less; or
- (ii) certified by the appropriate national approval authority as emitting 75 grams or less of CO<sub>2</sub> per kilometre when tested according to the procedure described in

Annex 8 of United Nations Economic Commission for Europe (UNECE)  
Regulation 101;

- (5) The conditions referred to in sub-paragraph (2) are that—
- (a) the vehicle has been hired to carry one or more passengers and is being lawfully used as a private hire vehicle for the purpose of carrying out that hiring;
  - (b) the booking for the hiring was accepted by an operator holding a London PHV operator's licence at an operating centre specified in that licence;
  - (c) the vehicle is shown in the record kept by the operator pursuant to regulation 12 of the Operators' Licences Regulations as a vehicle available to the operator for the carrying out of bookings accepted by the operator at that centre;
  - (d) the driver is shown in the record kept by the operator pursuant to regulation 13 of the Operators' Licences Regulations as a driver so available; and
  - (e) particulars of the booking have been entered pursuant to regulation 11 of the Operators' Licences Regulations in the record kept by the operator pursuant to regulation 10 of those Regulations.
- (6) In this paragraph—
- (a) “designated wheelchair-accessible private hire vehicle” means a vehicle that appears on a list of vehicles maintained by Transport for London under section 167(1) of the Equality Act 2010;
  - (b) "London PHV operator's licence" has the meaning given by section 36 of the Private Hire Vehicles (London) Act 1998;
  - (c) "the Operators' Licences Regulations" means the Private Hire Vehicles (London) (Operators' Licences) Regulations 2000;
  - (d) references to a vehicle being used as a private hire vehicle and to the operator of a vehicle shall be construed in accordance with section 1 of the Private Hire Vehicles (London) Act 1998.

**Disabled persons' vehicles**

- 5.—(1) In this paragraph—
- (a) “eligibility certificate” means a certificate issued under sub-paragraph (6) below;
  - (b) “eligible individual” means an individual who is the holder of an eligibility certificate;
  - (c) “eligible institution” means an institution which is the holder of an eligibility certificate;
  - (d) "eligible person" means an eligible individual or an eligible institution;
  - (e) "specified vehicle" means a vehicle which is specified under this paragraph by an eligible person.
- (2) A vehicle being used within the tunnels is a 100% discounted vehicle if it falls within Case A, Case B or Case C.
- (3) A vehicle falls within Case A if—
- (a) it is being driven by, or carrying, an eligible individual and that individual's eligibility certificate is being displayed on it; and
  - (b) it is a specified vehicle in relation to that certificate for the time it is used within the tunnels.
- (4) A vehicle falls within Case B if—
- (a) it is being driven within the tunnels for the purpose of collecting an eligible individual from a place on the other side of the tunnel concerned from the vehicle's origin; or
  - (b) it is being driven within the tunnels having been used to take such an individual to a place on the other side of the tunnel concerned from the vehicle's origin,
- and in each case it is a specified vehicle in relation to that individual's eligibility certificate for the time it is used within the tunnels.

- (5) A vehicle falls within Case C if—
- (a) a disabled person's badge is being displayed on it in compliance with regulation 15 or 16 (display of an institutional badge when a vehicle is being driven or parked) of the Disabled Persons (Badges for Motor Vehicles) (England) Regulations 2000;
  - (b) the holder of the badge is an eligible institution; and
  - (c) it is a specified vehicle in relation to that institution's eligibility certificate for the time it is used within the tunnels.
- (6) Transport for London may issue an eligibility certificate to an individual or an institution—
- (a) on payment of a charge of £10; and
  - (b) on its being satisfied that the individual or institution is the holder of a disabled person's badge issued, on the ground of the individual's reduced mobility, by a member State in accordance with Council Recommendation 98/376/EC.
- (7) Not more than one eligibility certificate may be held by any individual at any time and not more than one eligibility certificate may be held by an institution for each disabled badge held by it at any time.
- (8) In the following provisions of this paragraph "the relevant badge" in relation to an eligibility certificate means the disabled person's badge, or parking card, by virtue of which the certificate was issued.
- (9) An eligibility certificate issued within the period of 21 days beginning with the date on which the relevant badge was issued shall cease to have effect on the expiration of the period of 12 months beginning with that date.
- (10) In any other case an eligibility certificate shall cease to have effect on whichever is the earlier of—
- (a) the anniversary date of the issue of the relevant badge which falls within a period of not less than 12 months nor more than 24 months beginning with the date on which the eligibility certificate was issued; or
  - (b) the last day of the period of 21 days beginning with the day on which the relevant badge ceases to have effect.
- (11) Where an eligibility certificate ceases to have effect in accordance with sub-paragraph (9) or (10) a new certificate may be issued to the holder in accordance with sub-paragraph (6).
- (12) No charge shall be payable under sub-paragraph (6)(a) for the issue of a new eligibility certificate under sub-paragraph (11) if the application for the certificate is received by Transport for London within the period of 90 days beginning with the date on which the expiring certificate ceased to have effect.
- (13) Where purported payment of a charge under sub-paragraph (6) is made otherwise than in cash and payment is not received by Transport for London (whether because a direct debit, credit card or debit card payment is declined, or otherwise), the charge shall be treated as not paid and any eligibility certificate issued in relation to the charge shall be void and of no effect.
- (14) An eligible person may—
- (a) specify up to 2 vehicles in relation to the eligibility certificate held by that person; and
  - (b) subject to sub-paragraph (16) specify a different vehicle in place of a specified vehicle.
- (15) Unless a vehicle has been specified for a particular time it remains specified until a different vehicle has been specified in place of it.
- (16) Not more than 2 vehicles may be treated as 100% discounted vehicles for the purposes of this paragraph in relation to any eligible person at any time.
- (17) A vehicle shall not be treated as specified in relation to an eligibility certificate unless particulars of it—
- (a) appeared in the register at the time at which it was used; or
  - (b) were entered in the register by the end of that day.

## Vehicles used in the provision of particular public services

6.—(1) A vehicle which falls within one of the descriptions specified in sub-paragraph (2) and is in use for the purposes specified in that description is a 100% discounted vehicle if both the conditions specified in sub-paragraph (3) are met.

(2) The descriptions are—

- (a) a vehicle used for fire, police, national health service, ambulance or national security purposes and not falling within sub-paragraph 1(1)(c) of this Annex;
- (b) a vehicle used for the purposes of an operational function of any of the following councils where it is necessary, for the purpose of discharging the function, that the vehicle should be used within the tunnels—
  - (i) the Council of the Royal Borough of Greenwich;
  - (ii) the Council of the London borough of Newham; or
  - (iii) the Council of the London borough of Tower Hamlets;
- (c) a vehicle used for the purposes of waste collection or waste disposal by or on behalf of any of the following councils where it is necessary for those purposes that the vehicle should be used within the tunnels—
  - (i) the London Boroughs of Barking and Dagenham, Bexley, Bromley, Hackney, Havering, Lewisham, Redbridge, Southwark or Waltham Forest;
  - (ii) the City of London,provided that no charge is imposed on the persons for whose benefit the function is performed;
- (d) a vehicle used for the purposes of an operational function of the Royal Parks Agency in relation to any Royal Park (as defined by section 132AA of the Road Traffic Regulation Act 1984);
- (e) a vehicle used for the purposes of lifeboat haulage or HM Coastguard and not falling within paragraph 1(1)(c) of this Annex;
- (f) operational vehicles of the Port of London Authority used to attend an emergency on the River Thames;
- (g) an emergency response unit of—
  - (i) Transport for London; or
  - (ii) any London borough council,used for the purpose of responding to an emergency.

(3) The conditions referred to in sub-paragraph (1) are that—

- (a) Transport for London is satisfied on an application by the body for the purposes of which the vehicle is used that the vehicle falls within a description specified in sub-paragraph (2); and
- (b) particulars of the vehicle are for the time being entered in the register.

(4) For the purposes of sub-paragraph (2)(b) and (d) a vehicle is in use for an operational function if and only if it is in use for one or more of the following purposes—

- (a) street cleaning;
- (b) road maintenance;
- (c) waste collection;
- (d) waste disposal;
- (e) the management or maintenance of parks and open spaces;
- (f) mobile libraries;
- (g) dog wardens;
- (h) pest control;

- (i) meals on wheels;
- (j) parking enforcement;
- (k) schools transport, and

except where the vehicle is in use for the purpose specified in sub-paragraph (f) or (i) of this sub-paragraph, no charge is imposed on the persons for whose benefit the function is performed.

(5) A relevant vehicle not falling within any of the preceding paragraphs of this Annex which was on any occasion used within the tunnels shall, subject to the provisions of this paragraph, be treated as having been a 100% discounted vehicle on that occasion if—

- (a) a charge imposed by article 6 in respect of the use of the vehicle on that occasion was duly paid;
- (b) the vehicle was used on that occasion within the tunnels by a firefighter employed by the London Fire and Emergency Planning Authority ("the LFEPA") who, whilst on duty was required for operational reasons to proceed to another fire station; and
- (c) the LFEPA subsequently issues a certificate to Transport for London that conditions (a) and (b) were both met.

(6) Where Transport for London, on receiving such a certificate, is satisfied that a vehicle falls to be treated as having been a 100% discounted vehicle in accordance with this paragraph it shall refund the charge incurred to the LFEPA.

#### **Vehicles used for transporting certain NHS patients**

7.—(1) A chargeable vehicle not falling within any of the preceding paragraphs of this Annex which was on any occasion used within the tunnels to transport a relevant patient shall be treated as having been a 100% discounted vehicle on that occasion if—

- (a) the charge imposed by article 6 in respect of the use of the vehicle on that occasion was duly paid;
- (b) the vehicle was used for the purpose of transporting the patient to attend an appointment relating to establishing a diagnosis or to treatment provided by or on behalf of a health authority, National Health Service Trust or other National Health Service organisation ("the relevant NHS body");
- (c) the charge was reimbursed to the patient by the relevant NHS body; and
- (d) the relevant NHS body subsequently issued a certificate to Transport for London that conditions (b) and (c) were both met.

(2) Where Transport for London, on receiving such a certificate is satisfied that a vehicle falls to be treated as a 100% discounted vehicle in accordance with this paragraph, it shall refund the charge incurred to the relevant NHS body.

(3) In this paragraph "relevant patient" means—

- (a) a patient who—
  - (i) has a compromised immune system or requires regular therapy, assessment or recurrent surgical intervention; and
  - (ii) is clinically assessed as too ill, weak or disabled to travel to an appointment on public transport; or
- (b) a patient who, during an epidemic or pandemic prevalent in Greater London, is clinically assessed as being too vulnerable to infection to travel to an appointment on public transport.

#### **Vehicles used by certain NHS employees**

8.—(1) A relevant vehicle not falling within any of the preceding paragraphs of this Annex which was on any occasion used within the tunnels by an NHS employee shall be treated as having been a 100% discounted vehicle on that occasion if—



- (a) the charge imposed by article 6 of this Scheme in respect of the use of the vehicle on that occasion was duly paid by Auto Pay and the relevant NHS employer subsequently issued a certificate to Transport for London that the condition referred to in sub-paragraph (4) was met; or
  - (b) the charge imposed by article 6 in respect of the use of the vehicle on that occasion was duly paid otherwise than by Auto Pay; and
    - (i) the charge was reimbursed to the employee by the relevant NHS employer;
    - (ii) the condition referred to in sub-paragraph (4) was met; and
    - (iii) the relevant NHS employer subsequently issued a certificate to Transport for London that the conditions in this sub-paragraph (b) were met.
- (2) Where sub-paragraph (1)(a) applies and Transport for London is satisfied that a vehicle falls to be treated as having been a 100% discounted vehicle in accordance with this paragraph, it shall refund the charge concerned by means of a credit to the relevant Auto Pay account.
- (3) Where Transport for London, on receiving a certificate under sub-paragraph (1)(b)(iii), is satisfied that a vehicle falls to be treated as having been a 100% discounted vehicle in accordance with this paragraph, it shall refund the charge incurred to the relevant NHS employer.
- (4) The condition referred to in sub-paragraph (1)(a) and (1)(b)(ii) is met on an occasion if the vehicle was used on that occasion within the tunnels either—
- (a) by an NHS employee for the purpose of transporting in the course of employment—
    - (i) bulky, heavy or fragile equipment or supplies;
    - (ii) patients' notes or other clinically confidential material;
    - (iii) controlled drugs;
    - (iv) clinical waste, radioactive materials, contaminated sharps or non-medicinal poisons;
    - (v) prescription only medicines or waste medicinal products; or
    - (vi) clinical specimens, body fluids, tissues or organs; or
  - (b) by an NHS employee for the purpose of enabling that employee to provide services required in consequence of an emergency or other extraordinary circumstances.
- (5) In this paragraph—
- (a) "controlled drugs" has the meaning for the time being given by the Misuse of Drugs Act 1971;
  - (b) "medicinal product" has the meaning for the time being given by the Medicines Act 1968;
  - (c) "NHS employee" means—
    - (i) an individual employed by or providing services on behalf of or seconded to a relevant NHS employer; or
    - (ii) an individual performing primary medical services as, or on behalf of, a primary care contractor;
  - (d) "primary care contractor" means—
    - (i) a contractor who is a party to a general medical services contract within the meaning of regulation 3 of the National Health Service (General Medical Services Contracts) Regulations 2015 as amended;
    - (ii) a contractor within the meaning of regulation 3 of the National Health Service (Personal Medical Services Agreements) Regulations 2015 as amended;
    - (iii) an APMS contractor within the meaning of direction 1 of the Alternative Provider Medical Services Directions 2022 as amended; or
    - (iv) a NHS Trust who provides primary medical services pursuant to section 92 of the National Health Service Act 2006; and

- (e) the "relevant NHS employer" in relation to an NHS employee means the NHS Commissioning Board, Clinical Commissioning Group, National Health Service Trust, NHS Foundation Trust, primary care contractor or other National Health Service organisation by which the employee is employed, on behalf of which the employee is providing services, or to which the employee has been seconded.

#### **Vehicles used by certain care home employees**

9.—(1) A chargeable vehicle not falling within any of the preceding paragraphs of this Annex which was on any occasion used within the tunnels by a relevant care home employee shall be treated as having been a 100% discounted vehicle on that occasion if—

- (a) the charge imposed by article 6 in respect of the use of the vehicle on that occasion was duly paid by Auto Pay and the relevant care home employer subsequently issued a certificate to Transport for London that the condition referred to in sub-paragraph (4) was met; or
- (b) the charge imposed by article 6 in respect of the use of the vehicle on that occasion was duly paid otherwise than by Auto Pay; and
  - (i) the charge was reimbursed to the relevant care home employee by their relevant care home employer in relation to that occasion;
  - (ii) the condition referred to in sub-paragraph (4) was met; and
  - (iii) the relevant care home employer subsequently issued a certificate to Transport for London that the conditions in this sub-paragraph (b) were met.

(2) Where sub-paragraph (1)(a) applies and Transport for London is satisfied that a vehicle falls to be treated as having been a 100% discounted vehicle in accordance with this paragraph, it shall refund the charge concerned by means of a credit to the relevant Auto Pay account.

(3) Where Transport for London, on receiving a certificate under sub-paragraph (1)(b)(iii), is satisfied that a vehicle falls to be treated as having been a 100% discounted vehicle in accordance with this paragraph, it shall refund the charge incurred to the relevant care home employer.

(4) The condition referred to in sub-paragraph (1)(a) and (1)(b)(ii) is met on an occasion if the vehicle was used on that occasion within the tunnels by a relevant care home employee for the purpose of providing services on behalf of a relevant care home during an epidemic or pandemic prevalent at that time in Greater London.

(5) In this paragraph—

- (a) "relevant care home employee" means an individual employed by or providing services on behalf of or seconded to a relevant care home employer;
- (b) "relevant care home employer" means a registered service provider in respect of a relevant care home by which a relevant care home employee is employed or on behalf of which that employee is providing services or to which that employee has been seconded;
- (c) "registered service provider" means a person or organisation registered with the Care Quality Commission in accordance with section 10 of the Health and Social Care Act 2008 to provide accommodation together with nursing or personal care at a relevant care home; and
- (d) "relevant care home" means a care home within the meaning of section 3 of the Care Standards Act 2000 that is located within the Royal Borough of Greenwich, the London Borough of Newham or the London Borough of Tower Hamlets.

#### **Vehicles used by certain local authority and charity employees**

10.—(1) A chargeable vehicle not falling within any of the preceding paragraphs of this Annex which was on any occasion used by an eligible employee within the tunnels shall be treated as having been a 100% discounted vehicle on that occasion if—

- (a) the charge imposed by article 6 in respect of the use of the vehicle on that occasion was duly paid;

- (b) the charge was reimbursed to the eligible employee by their eligible organisation in relation to that occasion;
- (c) the conditions referred to in sub-paragraph (3) were met; and
- (d) the eligible organisation subsequently issued a certificate to Transport for London that conditions (a), (b) and (c) above were met.

(2) Where Transport for London, on receiving such a certificate, is satisfied that a vehicle falls to be treated as having been a 100% discounted vehicle in accordance with this paragraph, it shall refund the charge incurred to the eligible organisation.

(3) The conditions referred to in sub-paragraph (1)(c) are met on an occasion if Transport for London is satisfied, by the production of such evidence as it may reasonably require, that—

- (a) the vehicle was used on that occasion for the purpose of providing eligible services by or on behalf of an eligible organisation; and
- (b) the use of the vehicle on that occasion constituted an eligible journey.

(4) In this paragraph—

(a) “eligible services” means—

- (i) the provision of food, medicine, medical equipment, personal protective equipment (PPE), cleaning or hygiene supplies;
- (ii) the provision of domiciliary care by a domiciliary care agency or an individual in each case directly or indirectly contracted by or funded wholly or partly by an eligible local authority;
- (iii) the provision of services at accommodation provided specifically for rough sleepers who are also vulnerable people, including driving a vulnerable person to such accommodation;
- (iv) the movement of a victim of domestic abuse to a place of safety or to or from a police or legal appointment or a child visitation,

in each case when the services are provided during an epidemic or pandemic prevalent at that time in Greater London;

(b) “eligible organisation” means—

- (i) an eligible local authority; or
- (ii) an eligible charity;

(c) “eligible local authority” means any one of the following—

- (i) the Council of the Royal Borough of Greenwich
- (ii) the Council of the London borough of Newham;
- (iii) the Council of the London borough of Tower Hamlets; or
- (iv) the Greater London Authority;

(d) “eligible charity” means a charity that Transport for London is satisfied, by the production of such evidence as it may reasonably require—

- (i) falls within the meaning of section 1(1) of the Charities Act 2011; and
- (ii) provides eligible services;

(e) “eligible employee” means—

- (i) an individual employed by, providing services on behalf of, or seconded to an eligible organisation;
- (ii) an individual contracted by or funded wholly or partly by an eligible local authority, either through a domiciliary care agency or otherwise, to provide domiciliary care; or
- (iii) an individual providing services on a voluntary basis on behalf of an eligible charity;

(f) “eligible journey” means a journey that—

- (i) requires a vehicle travelling to a place on the other side of the tunnel concerned from the vehicle's origin; and
- (ii) Transport for London is satisfied could not reasonably have been undertaken in any other way than by the use of a relevant vehicle;
- (g) "domiciliary care" means personal care provided in their own homes for persons who by reason of illness, infirmity or disability are unable to provide it for themselves without assistance;
- (h) "domiciliary care agency" has the meaning given by section 4(3) the Care Standards Act 2000; and
- (i) "vulnerable person" means a person who is at high or moderate risk from an epidemic or pandemic prevalent in Greater London and references to "vulnerable people" shall be construed accordingly.

### **East London Low Income Resident's Discount – Eligibility**

**11.**—(1) The charge imposed under article 6 in respect of a qualifying local resident's vehicle shall be 50% of the charge specified in article 7(1).

(2) A vehicle is a qualifying local resident's vehicle if Transport for London is satisfied—

- (a) the vehicle meets the requirements of sub-paragraph (6) and (7); and
- (b) particulars of the vehicle are entered in the register.

(3) In this paragraph "qualified resident" means an individual as respects whom Transport for London is for the time being satisfied, by the production of such evidence as it may reasonably require, that—

- (a) the individual has attained the age of 17 years;
- (b) the individual's only or main residence is at premises primarily used for residential purposes situated in a relevant district;
- (c) subject to sub-paragraph (4), the name of the individual is shown in the register of parliamentary electors or the register of local government electors prepared and published under section 9 of the Representation of the People Act 1983 for the constituency or local government area in which those premises are situated and those premises are shown as the individual's qualifying address;
- (d) the individual is normally present at those premises during at least 4 nights a week; and
- (e) the individual—
  - (i) has satisfied (b) and (d) above in relation to those premises for a period of at least 13 weeks; or
  - (ii) intends to continue to satisfy (b) and (d) above in relation to those premises for a period which, taken with any period during which the individual has already done so, will amount to a period of at least 13 weeks; and
- (f) the individual is an eligible low income resident.

(4) Sub-paragraph (3)(c) does not apply where the individual is, for reasons not connected with his place of residence, not eligible to be an elector at parliamentary or local government elections or there has been insufficient time for the individual's name to be included in the register.

(5) Where a qualified resident ceases to reside at the premises in relation to which Transport for London was satisfied that the requirements in sub-paragraph (3)(b) to (e) were met but resides at other premises within a relevant district, that person shall cease to be a qualified resident unless that person has notified the change of residence to Transport for London and Transport for London is satisfied that those requirements are met in relation to those other premises.

(6) For the purposes of this paragraph a vehicle is a "qualifying local resident's vehicle" and an individual is a qualified resident in relation to that vehicle if —

- (a) the qualified resident or any person living in the same household is the registered keeper of the vehicle;

- (b) the registered keeper is that individual's employer or the employer of any person living in the same household; or
- (c) the vehicle is hired by or leased to that individual or any person living in the same household, or the employer of any such person; and
- (d) the vehicle meets the requirements specified in sub-paragraph (7).

(7) The requirements are that—

- (a) in the case of a vehicle registered under the 1994 Act in the name of, or hired by or leased to, the employer of a qualified resident or any person living in the same household, Transport for London is satisfied by the production of such evidence as it may reasonably require that the vehicle is kept for the exclusive use of the resident and members of the resident's household residing at the same address as the resident;
- (b) in the case of a vehicle of which a qualified resident or any person living in the same household is the registered keeper, the address of the registered keeper shown on the vehicle registration document must be the same as that of the premises referred to in paragraph 1(3)(b);
- (c) the vehicle is either—
  - (i) a vehicle constructed or adapted for the carriage of persons and their luggage and effects; or
  - (ii) a vehicle constructed or adapted for the carriage of goods or burden of any description and having a height not exceeding 2.44 metres.

(8) For the purposes of this paragraph an individual is an eligible low income resident if Transport for London is satisfied the individual is for the time being in receipt of one of the following benefits—

- (a) carer's allowance;
- (b) child tax credit;
- (c) housing benefit;
- (d) income-based jobseekers allowance;
- (e) income-related employment and support allowance;
- (f) income support;
- (g) state pension credit;
- (h) universal credit;
- (i) working tax credit,

or is a person that Transport for London is satisfied would be eligible for one of the above benefits but for the fact that they are only temporarily resident in the United Kingdom.

(9) At no time may particulars of more than one qualifying local resident's vehicle be entered in the register in relation to any one individual who is a qualified resident.

(10) In this paragraph—

- (a) "carer's allowance" means an allowance under section 70 of the Social Security Contributions and Benefits Act 1992;
- (b) "child tax credit" means a child tax credit under the Tax Credits Act 2002;
- (c) "housing benefit" means the benefit under section 130 of the Social Security Contributions and Benefits Act 1992;
- (d) "income-based jobseeker's allowance" has the same meaning as in the Jobseekers Act 1995;
- (e) "income-related employment and support allowance" means an "income-related allowance" under Part 1 of the Welfare Reform Act 2007;
- (f) "income support" means income support under section 124 of the Social Security Contributions and Benefits Act 1992;
- (g) "state pension credit" means state pension credit under the State Pension Credit Act 2002;

- (h) “universal credit” means the benefit under Part 1 of the Welfare Reform Act 2012;
- (i) “working tax credit” means a working tax credit under section 10 of the Tax Credits Act 2002.

**East London Low Income Resident’s Discount – temporary substitute vehicles**

**12.—**(1) This paragraph applies where—

- (a) a qualified resident—
  - (i) notifies Transport for London that the qualifying local resident’s vehicle registered in relation to that qualified resident (“the original vehicle”) has become, or is about to become, temporarily unavailable for use by that qualified resident owing to its undergoing or being about to undergo repair or servicing by a vehicle repairer;
  - (ii) notifies Transport for London that another vehicle (“the substitute vehicle”), being a vehicle hired by the qualified resident or made available by the repairer or insurer of the original vehicle, is from a specified date to be temporarily used by the qualified resident in place of the original vehicle;
  - (iii) notifies Transport for London that the last day of such temporary use is to be a specified date (which may from time to time be varied in advance) falling within the period of 30 days beginning with the date notified under sub-paragraph (ii); and
  - (iv) incurs expenditure on the payment of charges under article 6 for the substitute vehicle covering the period beginning with the date specified under sub-paragraph (ii) and ending with the date specified under sub-paragraph (iii); and
- (b) Transport for London satisfies itself that the requirements of paragraph (a) are met and that the substitute vehicle meets requirements (a) and (c) of paragraph 11(7).

(2) Where this paragraph applies—

- (a) any charges paid in respect of the original vehicle at the discounted rate set out in paragraph 11(1) for charging days falling within the period of substitution shall be of no effect during that period; and
- (b) if Transport for London receives a claim from the qualified resident not later than the last day of the period of 30 days beginning with the date specified under sub-paragraph (1)(a)(iii), the qualified resident shall be entitled to a refund of the amount specified in sub-paragraph (3).

(3) The amount is a sum equal to the total expenditure incurred as mentioned in sub-paragraph (1)(a)(iv) less the expenditure which the qualified resident would have had to incur in accordance with paragraph 11(1) covering the use of a vehicle within the tunnels within the period of substitution for which the qualified resident pays charges for the substitute vehicle.

**East London Low Income Resident’s Discount – new residents**

**13.—**(1) This paragraph applies where—

- (a) an individual (“the new resident”) having begun to reside or, in the case of an individual who has ceased to be a qualified resident under paragraph 11(5), to reside at other premises in a relevant district applies to be treated as a qualified resident and for particulars of a vehicle (“the relevant vehicle”) to be entered on the register as a qualifying local resident’s vehicle in relation to that individual;
- (b) within the period of 90 days beginning with the day on which that application is received by Transport for London (“the initial period”), the new resident incurs expenditure of amounts specified in article 7(1) on the payment of charges for the relevant vehicle on charging days falling within the initial period; and
- (c) Transport for London subsequently, on the basis of evidence furnished to it within the initial period,—

- (i) satisfies itself that the new resident became a qualified resident on or before the first day of the initial period; and
- (ii) enters particulars of the vehicle in the register as a qualifying local resident's vehicle in relation to the new resident and notifies the new resident accordingly.

(2) Where this paragraph applies, the new resident shall be entitled to a refund of an amount equal to the difference between—

- (a) the total expenditure incurred as mentioned in sub-paragraph (1)(b); and
- (b) the expenditure which the new resident would have had to incur in accordance with article 7(4) on the payment of charges covering the use of a vehicle on each occasion falling within the initial period for which the new resident has paid a charge under article 8.

### **Certificates of eligibility**

**14.**—(1) Where Transport for London is satisfied that the requirements in sub-paragraph (2) are met in relation to an individual it may issue a certificate of eligibility to that individual.

(2) The requirements are that—

- (a) the requirements in paragraph 11(3) and (8) are met in relation to the individual; and
- (b) particulars of a qualifying local resident's vehicle are not entered in the register in relation to the individual.

(3) A certificate of eligibility shall cease to have effect on whichever of the following falls first—

- (a) the expiration of the period of 12 months beginning with the day on which the certificate is issued;
- (b) day on which Transport for London notifies the holder that it is no longer satisfied that the requirements in paragraph 1(2) are met in relation to the holder.

(4) This sub-paragraph applies where—

- (a) the holder of a certificate of eligibility hires a vehicle for a period not exceeding 30 charging days and incurs expenditure of amounts specified in article 7(1) on the payment of charges for the vehicle on charging days falling within the period of the hiring;
- (b) before the hiring began, the holder had notified Transport for London that the hiring was to take place and given particulars of the first and last days of the period of the hiring; and
- (c) within the period of 30 days beginning with the last day of the hiring the holder submitted a claim, giving any particulars reasonably required by Transport for London for the purpose of verifying the claim, to Transport for London for a refund in accordance with sub-paragraph (5).

(5) Where Transport for London is satisfied that sub-paragraph (4) applies, the holder shall be entitled to a refund of an amount equal to the difference between—

- (a) the total expenditure incurred as mentioned in sub-paragraph (4)(a); and
- (b) the expenditure which the holder would have had to incur in accordance with article 7(4) on the payment of charges covering the use of a vehicle during the hiring period for which the hirer has paid a charge under article 7(1), other than charging days on which particulars of a qualifying local resident's vehicle were entered in the register in relation to the holder.

### **Small business and charities discount**

**15.**—(1) A charge imposed by article 6 in respect of a qualifying small business vehicle or a qualifying charity vehicle during off-peak hours and paid by Auto Pay shall be £1 less than the relevant charge specified in article 7(1).

(2) A qualifying small business vehicle is a vehicle meeting the conditions set out in sub-paragraph (6) that Transport for London is satisfied, on the basis of such information as it may reasonably require, is used by a qualifying small business for the purposes of that business.

(3) A qualifying charity vehicle is a vehicle meeting the conditions set out in sub-paragraph (6) that Transport for London is satisfied, on the basis of such information as it may reasonably require, is used by a qualifying charity for the purposes of that charity.

(4) A qualifying small business for the purposes of sub-paragraph (2) is a business that Transport for London is satisfied, on the basis of such information as it may reasonably require—

- (a) has under 50 employees;
- (b) had during the tax year in which the charge referred to in paragraph (1) was incurred, and in the previous tax year, a turnover of no more than £10.2 million or a balance sheet total of no more than £5.1 million; and
- (c) is a company that is active, or is registered for VAT, at an address located within the London Boroughs of Newham or Tower Hamlets or the Royal Borough of Greenwich, or
- (d) is a sole trader who owns and operates a business within the London Boroughs of Newham or Tower Hamlets or the Royal Borough of Greenwich;

(5) A qualifying charity for the purposes of sub-paragraph (3) is a registered charity that Transport for London is satisfied, on the basis of such information as it may reasonably require, is registered as active with the London Boroughs of Newham or Tower Hamlets or the Royal Borough of Greenwich.

(6) The conditions referred to in sub-paragraph (6) are that—

- (a) particulars of the vehicle are entered in the register, provided that no more than three vehicles eligible for a discount under this paragraph may appear in the register in relation to any qualifying small business or qualifying charity;
- (b) the vehicle is a specified vehicle for the purposes of article 9 in relation to an Auto Pay account in the name of the relevant qualifying small business or qualifying charity.

(7) In this paragraph—

- (a) "registered charity" means a charity within the meaning of section 1(1) of the Charities Act 2011 that is registered in accordance with section 30 of that Act, and references to a qualifying charity being registered shall be so construed;
- (b) "sole trader" means an individual who is self-employed and registered for self-assessment within the meaning of section 9 of the Taxes Management Act 1970.



## ANNEX 2 TO THE STATEMENT OF CHARGES

### SUMMARY OF ENFORCEMENT PROVISIONS

#### **Legal basis for enforcement**

Article 56 of The Silvertown Tunnel Order 2018 applies a number of regulations in force in respect of Transport for London's road user charging powers under Schedule 23 to the Greater London Authority Act 1999 to charges imposed in respect of use of the tunnels. In particular it provides that the statement of charges is to be treated as a 'charging scheme' for the purposes of those regulations, with the tunnels being treated as the 'charging area'. This is to ensure a relative level of consistency of enforcement powers, so the enforcement powers in force in respect of congestion charging and other road user charging also apply to the user charging at the tunnels. The applied legislation deals with penalty charges, the installation of equipment on roads, offences, the examination of motor vehicles and the removal or immobilisation of motor vehicles, and relevant matters related to those specific provisions are set out in the Statement of Charges.

Article 56 of The Silvertown Tunnel Order 2018 also applies various provisions of the Transport for London Act 2008 dealing with:

- (1) the ability for a charging scheme to create offences (with Secretary of State consent) where a 'specified requirement' of a charging scheme is contravened (but such an offence cannot apply to the failure to pay a charge or penalty charge or where a penalty charge would be payable under certain regulations);
- (2) the ability for a charging scheme to authorise the examination and immobilisation of vehicles and extending the scope of relevant regulations to vehicles in off street parking spaces; and
- (3) where a charging scheme makes provision for reduced charge rates or exemptions in the case of a class of vehicle or description of persons and it also requires the registered keeper to notify any change of circumstances, an offence being committed if such notification is not given.

#### **Summary of enforcement procedures**

The following summary is provided for information only. It is not intended to be a comprehensive guide to the legal processes involved.

If Transport for London records and capture an image of a vehicle anywhere in the tunnels and its records show a customer has not paid the required charge by midnight on the third day after the charging day concerned, a penalty charge notice (PCN) will be issued to the registered keeper of the vehicle.

Within 28 days from the date of service of a PCN the registered keeper concerned must pay the penalty or may challenge the PCN by making a representation online or in writing.

If the registered keeper concerned pays within 14 days of the date of service they will receive a 50% discount, the amount that must be paid being the discounted amount for the contravention date. Under the Interpretation Act 1978 s.7, unless the contrary is proved, service is deemed to have been effected at the time when the PCN would be delivered in the ordinary course of post.

If the registered keeper concerned wishes to make a representation against a PCN they are entitled to do so for the reasons listed below, which are as specified in the relevant regulations. Transport for London will also consider representations made on other grounds:

- Ground one: I was not the keeper at the time of the contravention, e.g. I have never been the keeper, I ceased to be the keeper, I became the keeper after the date of the contravention.
- Ground two: I had paid the charge due for the vehicle used on that date, in the time and manner required by the charging scheme.
- Ground three: no penalty charge is payable under the charging scheme, e.g. I was not within the charging area during charging hours.
- Ground four: the vehicle was used or kept without my consent, e.g. stolen.
- Ground five: the penalty charge exceeds the amount payable in the circumstances of the case, e.g. I have been requested to pay a penalty charge amount above that detailed in the regulations.
- Ground six: we are a vehicle hire firm and the vehicle was hired under an agreement at the time and the person liable signed a statement of liability for any resulting penalty charges.

If a penalty charge is not fully paid within 28 days of the date of service, then the penalty charge increases by 50% of the full penalty charge. A Charge Certificate is then sent to the registered keeper of the vehicle. The registered keeper then has 14 days from the date of service in which to pay this increased amount. Under the Interpretation Act 1978 s.7, unless the contrary is proved, service is deemed to have been effected at the time when the Charge Certificate would be delivered in the ordinary course of post.

Once a Charge Certificate is issued the registered keeper concerned can no longer make a representation. If they did not receive the original PCN, or if they have received no reply to a representation or an appeal, they can make a Statutory Declaration.

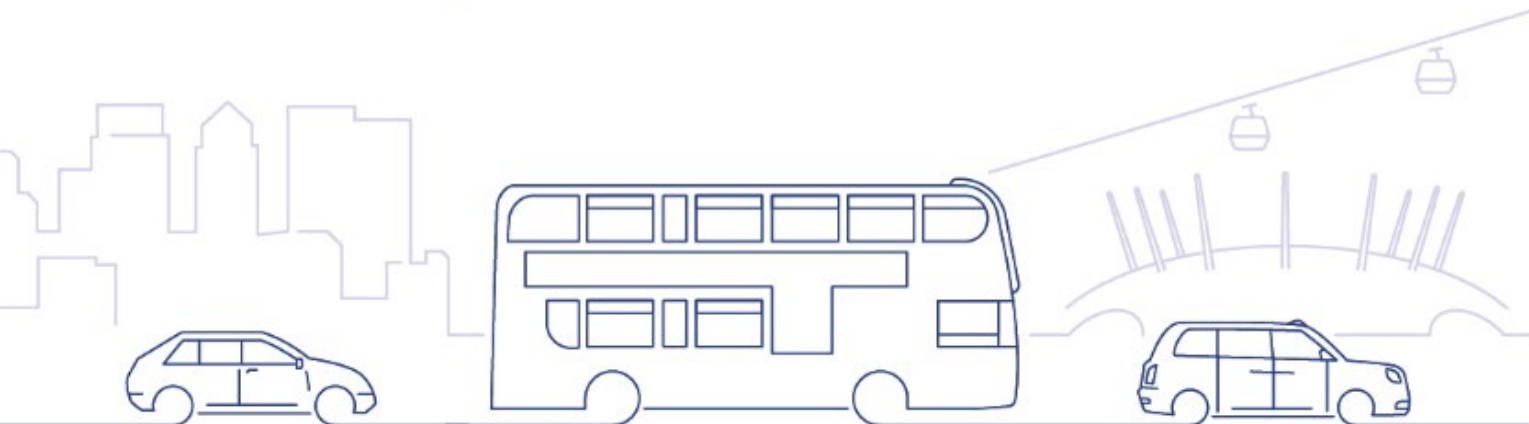
If the penalty charge is not paid within 14 days of a Charge Certificate being served then Transport for London may apply to register it as an unpaid debt at the Traffic Enforcement Centre which incurs a debt registration fee for each PCN.

The registered keeper will then be sent an Order for Recovery. This is not a County Court Judgment and will not affect their credit rating. At this point the penalty charge due increases by the debt registration fee. They have 21 days from the date of service in which to pay this. Under the Interpretation Act 1978 s.7, unless the contrary is proved, service is deemed to have been effected at the time when the Order for Recovery would be delivered in the ordinary course of post.

If the penalty charge has not been paid within 21 days of the Order for Recovery being served, Transport for London will ask for a Warrant of Control which will be passed to an enforcement agent to recover the outstanding debt. The registered keeper concerned will not be sent a copy of the Warrant, however, they may request a copy directly from the enforcement agent or their office.

Once a case has been passed to an enforcement agent, they will start enforcement activity. At this point the registered keeper concerned will receive an Enforcement Notice which details the name and address on the warrant and how much money they owe. If the registered keeper concerned ignores this initial notice, an enforcement agent may visit their property to collect the outstanding debt, plus any enforcement fees.

**Your Silvertown and  
Blackwall tunnels.  
Your river crossings.  
Your say.**



# **Silvertown and Blackwall tunnels user charge consultation**

## **Consultation Report**

**December 2024**

## Table of Contents

Glossary.....	5
(i) Glossary of terms:.....	5
(ii) Project Objectives of the Silvertown Tunnel in detail:.....	5
1. Executive Summary.....	6
1.1 Background.....	6
1.2 Statutory consultation - Silvertown Tunnel Implementation Group.....	6
1.3 Public consultation.....	11
1.4 Next Steps.....	17
2. About the consultation.....	18
2.1 Purpose.....	18
2.2 Consultation history.....	18
2.3 Who we consulted.....	18
2.4 Dates and duration.....	19
2.5 What we asked.....	19
2.6 Methods of responding.....	19
2.7 Consultation materials and publicity.....	19
2.8 Equalities Assessment.....	23
2.9 Analysis of consultation responses.....	23
3. About the respondents.....	25
3.1 Number of respondents.....	25
3.2 How respondents heard about the consultation.....	25
3.3 Methods of responding.....	26
3.4 Who responded.....	26
3.5 Postcodes analysis.....	27
3.6 Motivation to respond.....	28
3.7 Visits to our consultation website.....	29
4. Statutory consultation - Silvertown Tunnel Implementation Group.....	31
4.1 Background.....	31
4.2 STIG code frame and top issues.....	31
4.3 Summary of STIG stakeholder responses.....	36
5. Summary of public responses.....	43
5.1 Usual mode of travel across the River Thames in east London.....	43
5.2 Current usage of the Blackwall Tunnel.....	43
5.3 Future travel intentions when the Silvertown Tunnel opens.....	44
5.4 Intended usage of the Silvertown Tunnel when it opens.....	45

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

5.5	Future intention to use new public transport options when the Silvertown Tunnel opens	46
5.6	Current and intended usage of Auto Pay accounts	47
5.7	Proposed level of user charges	47
5.8	Proposed package of discounts, exemptions and reimbursements	48
5.9	Quality of consultation questions	49
5.10	Stakeholder responses	51
5.11	Petitions and campaigns	54
6.	Appendices	56
	Appendix A: Detailed Analysis of Comments & Our Response to Issues Raised	56
	(i): Code Frame	56
	(ii) Our Response to Issues Raised	74
	General Charges	74
	Charges/charging – general oppose	74
	Charges - should be higher generally	76
	Charges - should be lower generally	80
	Charging period	83
	Charges - other comments	84
	Off-peak Charges	92
	Off-peak charges - general oppose	92
	Off-peak charges - should be higher	92
	Off-peak charges - should be lower	92
	Peak Charges	93
	Peak charges - general oppose	93
	Peak charges - should be higher	93
	Peak charges - should be lower	93
	Auto Pay	94
	Auto Pay	94
	Penalty Charge Notice	95
	Impacts	96
	Impact – general	96
	Impact - traffic	107
	Discounts	113
	Discounts - general comments	113
	Discounts - low-income residents	117
	Discounts - residents	124
	Discounts - £1 business discount on standard off-peak charges	126
	100% discounts	126
	Exemptions	129
	Exemptions - general comments	129
	Exemptions – proposed	129
	Exemptions - other suggestions	130

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Reimbursements.....	135
Other Improvements and Comments .....	136
Proposed green and fair package - supporting measures .....	136
Other suggested improvements.....	137
Consultation .....	144
General comments about consultation .....	144
Survey questions .....	144
Survey design.....	145
Survey accessibility .....	145
Appendix B: Campaigns and petitions .....	148
Appendix C: Consultation survey.....	152
Appendix D: Consultation marketing.....	162
Appendix E: Summary of Stakeholder replies .....	165
Appendix F: List of stakeholders consulted with .....	188

## Glossary

### (i) Glossary of terms:

Abbreviation	Full name	Web link:
CPAP	Charging Policies and Procedure	<a href="#">Link</a>
EqIA	Equalities Impact Assessment	<a href="#">Link</a>
ES	Environmental Statement	<a href="#">Link</a>
DCO	Development Consent Order	<a href="#">Link</a>
MMS	Monitoring and Mitigation Strategy	<a href="#">Link</a>
STIG	Silvertown Tunnel Implementation Group	<a href="#">Link</a>
UCAF	User Charge Assessment Framework	<a href="#">Link</a>
POs	Project Objectives	See below

### (ii) Project Objectives of the Silvertown Tunnel in detail:

The Silvertown Tunnel project is designed to deliver seven Project Objectives:	
PO1	Improve the resilience of the river crossings in the highway network in east and southeast London to cope with planned and unplanned events and incidents
PO2	Improve the road network performance of the Blackwall Tunnel and its approach roads
PO3	Support economic and population growth, particularly in east and southeast London, by providing improved cross-river transport links
PO4	Integrate with local and strategic land use policies
PO5	Minimise any adverse impacts of any proposals on communities, health, safety and the environment
PO6	Ensure where possible that any proposals are acceptable in principle to key stakeholders, including affected boroughs
PO7	Achieve value for money and, through tunnel user charging, to manage congestion

## 1. Executive Summary

### 1.1 Background

The [Silvertown Tunnel](#) will open in spring 2025 and will help reduce congestion and deliver more reliable journeys with improved journey times in east London, including new public transport connections. To deliver the benefits of the tunnel and help to cover the construction costs, user charges will apply on both the Silvertown and Blackwall tunnels. These were first set out as part of a statutory consultation in 2015. The requirement to charge for the tunnels is described in the [Development Consent Order \(DCO\)](#) made by the Secretary of State for Transport in 2018 and the associated [Charging and Policy and Procedure \(CPAP\)](#) document.

Between 10 July and 3 September 2024, we consulted on the proposed charging levels, discounts and exemptions for both tunnels. We asked for feedback on proposals to vary charges by the time of day and day of the week, type of vehicle and payment method. We also wanted feedback on our proposals for a variety of discounts and exemptions to help disabled people, residents and businesses, for example a 50 per cent discount for low-income residents in east London and exemptions for taxis (black cabs), emergency service vehicles and others. This consultation was aimed at members of the public and anyone who might be impacted by our proposals, and functioned as the statutory consultation with the Silvertown Tunnel Implementation Group.

We received 5,361 responses to the consultation: 5,045 from members of the public; 207 from organised campaigns; and 109 from a range of stakeholder groups, such as local authorities, politicians, transport groups, environmental groups, freight organisations, local businesses and statutory consultees.

### 1.2 Statutory consultation - Silvertown Tunnel Implementation Group

The [Silvertown Tunnel Implementation Group](#) (STIG) was set up under the terms of the [DCO](#), and we are required to consult members of STIG on matters defined under the terms of the DCO. This includes setting the initial user charges, discounts and exemptions. There is more information about STIG in [Chapter 4](#) of this report, including a list of members.

We received consultation responses from the London Boroughs of Bexley, Hackney, Lewisham, Newham, Redbridge, Southwark, Tower Hamlets and Waltham Forest, the Royal Borough of Greenwich, City of London Corporation and National Highways.

We analysed the responses from the STIG members and found that there was a concern about increased congestion on surrounding roads following the introduction of the tunnel charges and concern that there were inadequate plans in place for how this would be monitored. Members also raised concerns about public transport provision and that the charges would not deter car use. They also called for the green and fair package of concessions and discounts to be extended beyond the current timescales and made a number of recommendations for further eligibility.

In table 1 we have summarised the top five issues raised by STIG members and our response to these issues. A full summary of all stakeholder responses is in section 4.3



and our response to all issues raised is in [Appendix A](#). Our code frame showing all feedback to the consultation can be found in [Appendix A](#).

**Table 1: Top 5 issues raised by members of the Silvertown Tunnel Implementation Group**

### Silvertown Tunnel Implementation Group: Top five most frequently raised issues

**1. Oppose/concern the proposals will increase levels of traffic and congestion. Question whether this is compatible with the Mayor's Transport Strategy and that the consultation has lacked clarity on how this will be monitored**

Our response:

Our extensive development work has shown that the Silvertown Tunnel scheme will effectively reduce congestion, support sustainable growth, and deliver an overall improvement in air quality. The new modern tunnel will enable more reliable and improved journey times, reduce the impact of traffic congestion on some of London's most polluted roads and provide more opportunities to cross the river by public transport with a network of zero-emission (at the tailpipe) buses offering new routes and better access to more destinations. In addition, it will provide much needed resilience to the network, especially when there are closures at the Blackwall Tunnel, of which there are around 700 per year on average.

The Silvertown Tunnel and associated user charging is directly referenced in the [Mayor's Transport Strategy](#) (MTS). Proposal 93 states, "The Mayor, through TfL, will continue to support the construction and operation of the Silvertown Tunnel, together with the introduction of user charges on the Blackwall and Silvertown tunnels (once the latter is opened), to address the problems of traffic congestion and associated air pollution, frequent closures and consequential delays, and the lack of network resilience and reliability at the Blackwall Crossing."

Setting the level of the user charges is supported by extensive traffic modelling and environmental assessment work. In setting the proposed user charges (including charge levels for different vehicles, charging hours, discounts and exemptions, and other factors), we have considered a range of factors, including the potential impact on the road network, the environment and the impact on different groups through an [Equality Impact Assessment \(EqIA\)](#). We considered a range of user charge levels to determine which would most effectively contribute to achieving the [Project Objectives \(POs\)](#). Overall, the proposed charges performed best in delivering the [POs](#) when assessed through the [User Charge Assessment Framework \(UCAF\)](#). The assessment concluded the initial user charges are not forecast to give rise to materially new or materially different environmental effects to those reported in the Environmental Statement. The proposed charges are forecast to provide optimal performance against the [POs](#) delivering a large reduction in delay and congestion on tunnel approaches, while minimising the impact at nearby crossings.

In relation to the plan for monitoring, the impacts and longer-term evaluation of the new Silvertown Tunnel will be measured through the [Monitoring and Mitigation Strategy \(MMS\)](#) and changes to traffic levels and composition, road network performance, air quality and noise, together with socio-economic impacts will be fully monitored in line with its requirements.

We are required to consult with [STIG](#) on matters around planning and operating the scheme including on air quality and traffic monitoring, the setting of user charges and proposals for the new bus services. STIG members are statutory consultees for the proposed level of charges required to be paid for use of the tunnels and any exemptions and discounts.

We have published all relevant baseline monitoring data as and when it has been available throughout the monitoring period, which began in 2020 and will extend for at least three years after the tunnel opens. The STIG papers are publicly available on the [STIG website and](#) provide a record of matters that have been discussed and decisions made. Quarterly monitoring reports will be shared with STIG and published in the first year of opening and annually thereafter. We are also required to review the user charges once the tunnel has been operational for 12 months, and, if necessary, we must revise the charges to mitigate any significant adverse impacts attributable to the Scheme which were not predicted in the pre-opening assessment.

Our longer-term evaluation of the key impacts of the scheme will be published annually in the form of a dedicated 'Travel in London' Focus report. This will summarise the overall impacts in the context of wider changes affecting London and in terms of contribution to the aims of the MTS. The report will also include our monitoring of the wider transport, environmental and social and economic impacts of the scheme. A baseline report will be published before the tunnel opens (expected spring 2025), with annual publications thereafter.

**2. Suggest proposed charges should be higher for cars (an example comment: the charge level for a car should always be higher than a bus fare)**

A key objective of the user charges is to manage demand and ensure the benefits of the project are achieved as well as manage any impacts on local communities and the environment (PO5).

The user charges also help to fulfil PO2, improving road network performance and PO7, managing congestion, and PO3, supporting economic and population growth by providing improved cross-river links.

In order to help achieve these objectives, it is important that all vehicles which could use the tunnels and contribute to wear and tear, congestion and environmental impacts are in scope for charging. It is recognised that the magnitude of this impact varies by vehicle and the proposed charge levels have been scaled in part to reflect this.

The charge for cars (which make up the highest proportion of cross river trips at the Silvertown and Blackwall tunnels) has been set at a level which reflects these impacts and enables us to effectively manage demand for the tunnel so that all users benefit from the additional capacity it provides.

It is important to set the charges at a level which enables users to benefit from the increased capacity while ensuring the POs are met, in particular in managing the negative impacts of traffic on the surrounding area. A higher user charge for this group could lead to diversions to other crossings, and thereby have negative impacts on the local road network.

For at least the first year, bus travel on any of the new routes for local residents, cross-river DLR travel and the cross-river cycle shuttle-bus, will be free. The user charge level is a balance of many factors; if it is too high there is a risk of increasing traffic using other

neighbouring crossings such as Rotherhithe Tunnel, but if it's too low there is a risk of not meeting the Project Objective of managing traffic demand. The amount paid for any journey depends on the user, vehicle type, concessions available and other factors.

The headline off-peak user charge cost for a car (£1.50) is slightly less than an adult pay as you go bus fare (£1.75). Setting the level of the user charges is supported by extensive traffic modelling and environmental assessment work. However, there are several other factors that make travelling by bus overall a cheaper option than travelling by car.

Several other costs that need to be accounted for when owning a car such as fuel, maintenance and parking etc. And when added together, the overall cost to make a cross-river journey by car will be more than the £1.50 headline user charge cost.

While an adult pay as you go bus fare is £1.75, not everyone will pay this full cost. There are discounts for many that travel by bus such as people on a low-income, apprentices and students and young carers etc. Furthermore, when more than one bus journey is made, this will frequently attract a discount, e.g. through the hopper fare, through daily or weekly price caps, or when travelling on a monthly or annual bus and tram pass. It's also important to note that bus travel through both the Blackwall and Silvertown Tunnels will be free for at least one year from when the tunnel opens, encouraging people to use the new frequent bus services that will be operating through the tunnel from day one.

### **3. Suggest bus service/public transport provision needs improving / increasing links for those affected**

#### Our response:

Ahead of a public consultation in 2023, we consulted with STIG on the proposed opening Silvertown Tunnel bus network following the process outlined in the Silvertown Tunnel Bus [Strategy](#).

The opening of the Silvertown Tunnel allows us to introduce an enhanced cross-river bus service in east London. Today, only the single-deck 108 bus crosses the river east of Tower Bridge via the Blackwall Tunnel. The development of the bus network was carried out in accordance with the processes set out in the [Bus Strategy](#), which involved consultation with STIG members on the outline proposals. The bus network was then subject to a public consultation between November 2022 and January 2023. The opening Silvertown and Blackwall Tunnel bus network has been confirmed as 21 zero-emission buses per hour crossing the river at peak times (07:00 – 19:00).

The initial bus services include the retention of route 108 (Stratford International station to Lewisham station) via the Blackwall Tunnel; the extension of route 129 (currently Lewisham to North Greenwich and will be extended to Great Eastern Quay via City Airport); and a new route Superloop SL4 (Grove Park to Canary Wharf). All services will use zero emission buses and routes using the Silvertown Tunnel will be double-deck buses.

Bus journeys through the Silvertown Tunnel will be further enhanced by the availability of a bus lane through the tunnel in both directions. Buses using the Blackwall Tunnel will have priority access to the tunnel via a bus-only link from Tunnel Avenue for buses to join the A102 Blackwall Tunnel Approach northbound, and a dedicated bus only exit slip to allow access to North Greenwich Bus station for Blackwall Tunnel southbound buses via Millennium Way.

We will monitor demand for bus services once the Silvertown Tunnel is open and respond accordingly. This includes considering additional cross-river routes or enhancing services on the opening bus network routes. Key considerations for changes include new developments coming forward in the adjacent Opportunity Areas as well as increases in demand for cross-river travel by bus. We will continue to engage with STIG to monitor and develop plans for further enhancements to the service, should they be required.

In addition to these bus improvements, we are also progressing work on other sustainable cross-river travel choices, such as the expansion of Surrey Quays station, and pursuing longer term projects such as DLR to Thamesmead.

**4. Concern proposals will not encourage car users to use other forms of transport/reduce car use/is incompatible with the Mayor's Transport Strategy**

Our response:

When the Silvertown Tunnel opens, we will deliver a significant improvement in alternative modes of transport to driving across the river. While some drivers will be prepared to pay the charge for a more reliable car journey with improved journey times, there will also be current drivers who may opt to make fewer journeys, switch to public transport, retime their journeys to avoid the peaks, change origin/destination or use alternative crossings.

To support residents and businesses, and encourage people to use new public transport connections, we propose a package of concessions and discounts to make the scheme as green and fair as possible. These include a 50 per cent discount for low-income households in 13 east London boroughs and a £1 discount on the off-peak charge for small businesses, sole traders and charities in the three host boroughs. Local residents will also benefit from free cross-river bus and DLR travel, as well as from a cross-river cycle shuttle-bus service, both free for at least 12 months after Silvertown Tunnel opens.

There will be more opportunities for residents to cross the river by public transport, with a network of zero-emission buses. At present cross-river bus connectivity in east London is limited, with no crossing for double deck buses between Tower Bridge and the Dartford crossing. Now, in addition to the route 108 (via Blackwall Tunnel), we will be introducing the new Superloop SL4 route and route 129 will be extended, providing 21 cross-river buses per hour in each direction in the busiest times between 07:00 – 19:00 Monday to Friday. These improvements will transform cross-river travel and offer better access to jobs, education, retail and leisure opportunities in places like Canary Wharf and the Royal Docks. Travel on these new and enhanced routes will be free for at least 12 months from tunnel opening.

The Silvertown Tunnel and associated user charging is directly referenced in the Mayor's Transport Strategy. Proposal 93 states, "*The Mayor, through TfL, will continue to support the construction and operation of the Silvertown Tunnel, together with the introduction of user charges on the Blackwall and Silvertown tunnels (once the latter is opened), to address the problems of traffic congestion and associated air pollution, frequent closures and consequential delays, and the lack of network resilience and reliability at the Blackwall Crossing.*"

**5. Suggest bus concession to support local residents using new cross-river bus services and the cross-river cycle shuttle-bus should be made permanent**

Our response:

The proposal is for the cross-river bus routes (21 buses per hour at peak times on routes 108, 129 and Superloop SL4) to be free for at least 12 months to encourage use of these new and improved bus services. Following opening, in the first year of operation, we will review uptake of the services, assess suitability of the timetable and make changes if necessary.

The cross-river cycle shuttle-bus will run for at least three years, with the first year free. Following opening of the service, we will monitor use of the service. As part of this review, we will assess the impacts of making the shuttle free, discounted or fully charged beyond the opening year.

### 1.3 Public consultation

Of the 5,361 responses to the consultation, 5,045 were from members of the public, 207 from organised campaigns, and 109 from a range of stakeholder groups, such as local authorities, politicians, transport groups, environmental groups, freight organisations, local businesses and statutory consultees (including members of STIG).

We received two organised campaign responses. These campaigns are:

- [Friends of the Earth](#) calling for higher charges for more-polluting vehicles, a review of all east London crossings to allocate more space for greener travel options, and showing support for discounts for low-income Londoners (120 responses)
- [We Are Possible](#) opposing the charges, calling for Silvertown Tunnel to be repurposed for public transport and active travel only, and equal tolls across all London bridges and tunnels (31 responses)

The information presented in these campaign emails – along with all other feedback received – has been analysed and the themes responded to in our response to issues raised provided in Appendix A.

In addition to the two organised campaigns, we received an unidentified campaign calling for the introduction of Routemaster buses (56 responses). The comments about Routemaster buses in this campaign were out of scope as this was not part of our consultation proposals<sup>1</sup> All comments in the campaign responses that related to the consultation proposals have been analysed. All consultation responses have been analysed and themes responded to in our response to issues raised report. A summary of how the analysis has been conducted can be found in chapter 2.10.

During the consultation period we received two petitions. The first petition was raised by a member of the public opposing the proposed charge levels and had over 28,000<sup>2</sup>

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<sup>1</sup> Between November 2022 and January 2023 we held a [public consultation](#) on our proposals for a new bus network to serve the Silvertown Tunnel, during which a similar campaign was raised and addressed. Further information is available on the consultation website: <https://haveyoursay.tfl.gov.uk/silvertown-tunnel-bus-network>.

signatures. A second petition was opposed to the user charges and was submitted by Assembly Member Alex Wilson (Reform UK) with 3,775 responses. Further details about the petitions and the campaigns are included in [Chapter 5](#).

We asked for feedback on the proposed levels of the user charges. A large number of consultation respondents objected to the proposed level of charges, as well as charging for the tunnels more generally. We also received comments regarding the lack of charges for crossings in west London, opposing charges for the Blackwall Tunnel specifically and that the proposals unfairly penalise motorists.

In table 2 we have summarised the top five issues raised in response to the question of our proposed level of user charges at the Silvertown and Blackwall tunnels and our response to these issues. Our code frame showing all feedback to the consultation can also be found in [Appendix A](#). Our response to all issues raised is also set out in [Appendix A](#).

**Table 2: Top 5 issues concerning proposed level of user charges**

<b>Proposed level of user charges: Top five most frequently raised issues</b>
<b>1. Oppose/disagree with the proposed charges/charging generally</b>
<p><u>Our response:</u></p> <p>The primary purpose of the user charges is to manage traffic demand for the river crossings. By managing this traffic demand, we can support economic and population growth and minimise any adverse impacts on communities, health, safety and the environment, allowing the Scheme to achieve its <a href="#">Project Objectives (POs)</a>. A secondary reason for the user charges is to provide a means of helping to pay for the design, construction and operation of the new tunnel.</p> <p>To determine the opening year user charges, we assessed a range of user charging scenarios (including zero charge), following the policies and procedures as set out in the CPAP. This entailed using the <a href="#">User Charging Assessment Framework (UCAF)</a> to identify how each scenario would contribute to successfully delivering the <a href="#">POs</a> including effective traffic demand management (and the associated economic and environmental impacts of this demand) as well as ensuring that the initial user charges are 'not likely to give rise to materially new or materially different environmental effects to those reported in the Environmental Statement'. The UCAF assessment shows that the proposed charges are forecast to provide optimal performance against the <a href="#">POs delivering a large reduction in delay and congestion on tunnel approaches, while minimising the impact at nearby crossings</a>. A zero-charge scenario performed badly against the POs with significant delay and congestion remaining on tunnel approaches with worse traffic and environmental impacts when compared with the proposed charges.</p> <p>Operating the Silvertown Tunnel with no user charge performed badly against all project objectives when assessed through the UCAF. Building on the extensive user charge optioneering completed to support the DCO submission, the proposed charges have been developed to optimise performance across all project objectives.</p>

To deliver the benefits of the tunnel and help to cover the construction costs, user charges were first set out as part of a statutory consultation in 2015. The requirement to charge for the tunnels is set out in Part 5 of the [Development Consent Order \(DCO\)](#) made by the Secretary of State for Transport in 2018 and the associated [Charging and Policy and Procedure \(CPAP\)](#) document.

## **2. Oppose/concern that proposals are unfair to those living in/travelling from east/southeast London**

### Our response:

Although the user charges will be a new cost for some drivers, the scheme also represents a significant investment in east and south-east London through addressing the chronic issues at the Blackwall Tunnel and the consequential impacts these have on the economy, environment and communities across east and south-east London.

The new cross-river bus network of 21 buses per hour at peak times, including routes 129 and Superloop SL4 and lower and more reliable journey times on the route 108, will open up new journey opportunities in East/South-East London. These services will enable residents on the Greenwich Peninsula to access over 43,000 more jobs within a 60-minute journey. Similarly, residents of West Silvertown will be able to access over 21,000 more jobs within a 60-minute journey.

Residents will benefit from reductions in vehicle journey time and improvements in journey time reliability through the Blackwall Tunnel, with journeys forecast to be up to 20 minutes quicker in the peak.

## **3. Suggest proposed charges are too expensive/should be lower**

### Our response:

In developing the proposed user charges and the discounts and exemptions, we have considered the policies and procedures set out in [CPAP](#), the achievement of the [POs](#), the equalities impacts and other relevant considerations such as our traffic management duties. We used the Assessed Case as a starting point for the Refreshed Assessment, then tested a range of potential user charges. The proposed user charges put forward as part of this consultation provide optimal performance against these criteria, and represent the best balance of all considerations taken into account.

If the charges are set too high, overall demand for adjacent crossings would increase significantly and the project objective would not be met. If we were to set the user charge too low, it would attract additional traffic to the crossings and would erode the benefits of the project.

The charge levels in the Assessed Case (which formed part of the [DCO](#) application in 2016) were based on 2015 prices. We used the Department for Transport's (DfT) Gross Domestic Product (GDP) deflator tool to calculate how prices have changed between 2015 and 2025 as a result of inflation. When calculating the user charges proposals, this tool shows that the prices in the Assessed Case need to be adjusted by 33.5 per cent to account for inflation when compared to 2015 prices which.

The proposals offer opportunities to pay lower user charges, for example by registering for [Auto Pay](#), which means that customers can benefit from off-peak charges at certain times and offers the additional benefit of removing the risk of incurring a penalty charge notice (PCN). No user charges will apply between 22:00 – 06:00. Some residents of the

13 east London boroughs would qualify for the 50 per cent discount for a period of at least three years and eligible small businesses, sole traders and charities based in the host boroughs would also be able to register for a £1 discount on standard off-peak charges for at least twelve months. In addition, we have proposed a 100 per cent discount for Blue Badge holders, exemptions for vehicles in the disabled tax class and reimbursements for certain NHS patient and staff trips if certain criteria are met.

#### **4. Oppose proposals as it is just a revenue-raising project for TfL/waste of resources**

##### Our response:

Managing traffic demand and the consequent environmental impacts is the main reason for the user charges. A secondary reason for the user charges is to provide a means of helping to pay for the design and construction of the Silvertown Tunnel and the on-going maintenance, management and operation of both tunnels.

Managing demand effectively via user charges means the additional capacity brought about by the new tunnel does not generate induced traffic, and there remains a tangible benefit from it in the long term.

Revenue from user charges is the primary source of funding for the scheme. We expect the revenue from user charges at both the Silvertown and Blackwall tunnels will, over time, cover the cost of the new tunnel. Without this revenue stream, the project would not have been viable and the persistent issues at the Blackwall Tunnel would remain.

An assessment of a zero-charge scenario (as well as other user charging scenarios) was also undertaken prior to submitting the [DCO](#). However, this scenario would not have delivered the [POs](#) and was therefore dismissed at this time.

#### **5. Oppose/disagree with charging to use the Blackwall Tunnel**

##### Our response:

The purpose of introducing tunnel user charges for the Silvertown and Blackwall tunnels is to manage traffic demand effectively. This will allow us to support economic and population growth and the other minimise any adverse impacts on communities, health, safety and the environment, allowing the scheme to achieve its Project Objectives. The user charges will also provide a means of helping to pay for the design and construction of the Silvertown Tunnel, and on-going maintenance, management and operation of both tunnels, as well as investing in transport in south and east London.

While the nearby Blackwall Tunnel is currently free to use, it suffers from chronic issues of congestion and regular traffic incidents, meaning the cross-river road network has poor resilience with no suitable alternative crossings in this part of London. This has a significant negative impact on travel, the economy and the environment across wide areas of east and southeast London. Regular tailbacks lead to miles of queuing traffic and poor air quality. The Silvertown Tunnel has been constructed nearby to solve these problems.

If we introduce user charges on only the Silvertown (or Blackwall) tunnels and not the other, the benefits of the project will not be realised. Drivers will favour the non-charged tunnel, despite its constraints, and will not make best use of the new infrastructure. Given the tunnels' proximity on the south side, if the Blackwall Tunnel were not subject



to a charge, queues would build up as they do today and inhibit access to the Silvertown Tunnel. As well as removing the benefit of reduced congestion and emissions from queueing traffic, other benefits such as the opportunity for enhanced cross-river bus provision would be eroded.

Implementing user charges at both Silvertown and Blackwall tunnels was discussed during the public examination for the project in 2016 and the reasoning set out in the [CPAP](#). It explains why charging at both tunnels is fundamental for traffic demand management and for successfully delivering the [POs](#). Introducing user charges for both tunnels is directly related to achieving the [POs](#) as set out in section 2.1 'Achieving the Project Objectives' in the [CPAP](#).

We also asked for feedback on our proposed package of discounts and exemptions. We found that many respondents thought that the discounts should be extended to all residents living near the tunnels and surrounding areas, or that local residents should be exempt from tunnel charges. Some respondents also felt that motorcycles should be exempt from tunnel charges.

In table 3 below we have summarised the top five issues raised in response to this question and our response to these issues. Our response to all issues raised is in [Appendix A](#). Our code frame showing all feedback to the consultation can be found in [Appendix A](#).

**Table 3: Top 5 issues concerning proposed package of discounts, exemptions and reimbursements**

<b>Proposed discounts, exemptions and reimbursements: Top five most frequently raised issues</b>	
<b>1. Suggest discounts should be for all residents local to tunnels/living in the surrounding area</b>	<b>2. Suggest residents local to tunnels/living in the surrounding area should be exempt</b>
<p><u>Our response:</u></p> <p>We expect the proportion of journeys originating locally for Silvertown and Blackwall tunnels to be around 50 per cent. If all local residents were exempt or received a discount, the scheme would be less successful in delivering its objectives. Congestion at Blackwall tunnel would continue to be a problem, and traffic demand for the crossings would increase with consequent impacts on potential economic growth, local communities and the environment.</p> <p>We have developed a green and fair package of concessions and discounts for local residents on a low-income, businesses, sole traders and charities which includes free travel on any of the new routes for local residents, cross river DLR and the cross-river cycle shuttle-bus, for at least the first year.</p>	
<b>2. Suggest residents local to tunnels/living in the surrounding area should be exempt</b>	

Our response:

We expect the proportion of journeys originating locally for Silvertown and Blackwall tunnels to be around 50 per cent. If all local residents were exempt, the scheme would be less successful in delivering its objectives. Congestion at Blackwall tunnel would continue to be a problem, and traffic demand for the crossings would increase with consequent impacts on potential economic growth, local communities and the environment.

We have developed a green and fair package of concessions and discounts for local residents on a low-income, businesses, sole traders and charities which includes free travel on any of the new routes for local residents, cross river DLR and the cross-river cycle shuttle-bus, for at least the first year.

**3. Suggest motorcycles/mopeds/motor tricycles should be exempt**

Our response:

A key objective of the user charges is to manage demand and thereby lock in the benefits of additional capacity and, importantly, manage the effects of traffic on the environment.

Motorcycles like all other vehicles will benefit from the scheme though journey time savings and more reliable journeys and the increased resilience afforded by the scheme.

Motorcycles also contribute to congestion, noise and air pollution as well as wear and tear of road surfaces and, therefore, will be subject to user charges.

**4. Oppose/disagree with the proposed discounts**

Our response:

In setting the discounts and exemptions for the Scheme, we have considered the achievement of the POs, the policies and procedures set out in CPAP (such as Policy 2, which says that the user charges must be fair, justified and not undermine the POs), the equalities impacts and other relevant considerations such as our traffic management duties and our equalities duties.

In developing these, and in developing other discounts and exemptions under PO2, we have considered how widening the number of, or eligibility for, discounts and exemptions impacts on the [POs](#), including impacts on traffic and congestion, air quality and revenue. We have carefully considered the discounts we are providing and the eligibility for these to ensure they are effective and support those who may need them most. This includes local businesses, local residents, and groups who may need to travel via the tunnels regularly but may find it challenging to do so by public transport.

**5. Oppose/disagree with taxis (black cabs) being exempt**

Our response:

Taxis have a vital role to play in London. All taxis licensed in London are required to be wheelchair accessible and have a range of other accessibility features. Taxis are unable to refuse a hiring within specified distances, which means they would be unable to avoid hirings which require tunnel crossing(s). Furthermore, taxis must make use of the shortest route, meaning they would be unable to avoid user charges by using an

alternative longer route. We have proposed an exemption for taxis due to the important role they play in London in providing transport for those who may not be able to access other modes, the regulatory constraints they are subject to and the need to ensure that the user charges do not impact the level of service provision.

As of April 2024, there were 14,776 taxis licensed in London; this is a small proportion of the overall number of vehicles using London's roads. Taxis also make up a relatively small percentage of the total daily traffic at Blackwall Tunnel, at one per cent in 2025 without Silvertown Tunnel, and it is expected that this would increase to two per cent of total traffic with the new tunnel. For these reasons, an exemption for taxis is fair and justified and would not undermine TfL's achievement of the POs.

#### **1.4 Next Steps**

We have considered all feedback to the consultation. The [TfL Board](#) will use the information in this report alongside other relevant materials to set the charge levels, discounts and exemptions. The Board will be asked to approve for publication the Statement of Charges which will contain all the details relevant to when tunnel user charges are payable as well as a summary of enforcement provisions.

Following the Board decision, we will notify all those who responded to the consultation with the outcome.

## **2. About the consultation**

### **2.1 Purpose**

The objectives of the consultation were to:

- Raise awareness of the introduction of a tunnel user charges at the Silvertown and Blackwall tunnels when the Silvertown Tunnel opens in spring 2025
- Follow through on our commitment in the 2015 preliminary charging report to seek feedback from key stakeholders including the public on the initial user charges closer to tunnel opening
- Give stakeholders and the public the opportunity to give feedback on the proposed charge levels, discounts and exemptions
- Give stakeholders and the public the opportunity to tell us how these proposals might impact them (their journeys, their communities, etc).

### **2.2 Consultation history**

We consulted on proposals to build the Silvertown Tunnel in 2015. This included proposals for user charges outlined in a preliminary charging report published as part of the 2015 statutory consultation. The preliminary charging report stated that in advance of the tunnel opening, we would publish a report on the proposed initial charges with feedback/comments invited from all key stakeholders and the public.

The requirement for the tunnel to operate with user charging in place was confirmed as part of the project's Development Consent Order, which was approved by the Department for Transport in 2018.

Further information relating to the development of the Silvertown Tunnel is available on our dedicated [project webpage](#).

### **2.3 Who we consulted**

The consultation was open to anyone who wanted to have their say and give us their feedback. We also engaged directly with STIG members to make sure they were aware of the proposals with briefings during the consultation period.

We reached out to ward councillors, council officers and Leaders in east and southeast London boroughs, and local residents and businesses close to the tunnels. In addition, we targeted charities, disability groups and other groups representing residents with protected characteristics who may be most affected by our proposals.

We wanted to make sure that people and stakeholders that currently use the Blackwall Tunnel for commuting, business or leisure trips were aware of the consultation on our proposals. We targeted freight and logistics organisations, taxi and private hire trade bodies and emergency service organisations. We also communicated to private vehicle owners through local media and emails.

We consulted with stakeholders and local community groups in east and southeast London boroughs, including local, pan-London and national elected representatives, environmental groups, active travel stakeholders and landowners such as the O2 and London City Airport. We used established networks and communication channels to maximise engagement with the consultation, and asked stakeholders to promote the consultation through their own channels and social media.

A full list of all stakeholders consulted with can be found in Appendix F.

## **2.4 Dates and duration**

The consultation period was eight weeks between 10 July and 3 September 2024.

## **2.5 What we asked**

We asked for comments on our proposed user charge levels, discounts and exemptions.

We also wanted to understand respondents' current travel habits, and how or if they intended to change these when the Silvertown Tunnel opens.

A copy of the consultation survey can be found in Appendix C.

## **2.6 Methods of responding**

We made several channels available through which people could respond to the consultation.

Respondents could complete a consultation survey by visiting our website: <https://tfl.gov.uk/tc-yourview>.

Feedback could also be submitted by email to [TC-yourview@tfl.gov.uk](mailto:TC-yourview@tfl.gov.uk) or in writing to 'Freepost Have Your Say'.

Respondents could complete an Easy Read version of the consultation survey. This survey was also available to download from our web page as a fillable PDF for completion and return by email. It could also be printed, completed, and sent back to us via our Freepost service.

We printed and sent paper versions of all our materials by post on request, and we provided a telephone call-back service for respondents to get in touch with any questions.

## **2.7 Consultation materials and publicity**

We publicised the consultation across a range of media, including via emails to stakeholders and the public, an extensive social media campaign, a press release, local and national news articles, posters at rail stations, leafleting in areas close to the tunnels, and online. This is detailed below:

## **Emails to public/stakeholders**

In order to reach as many people as possible who might be impacted by or interested in our proposals, we emailed 168,390 residents using our database of user information in east and southeast London boroughs, and those that used London Underground, Elizabeth Line and DLR stations in these areas, when the consultation launched. This included 14,682 emails to people who had opted in for driving updates and have recently paid LEZ or ULEZ charges, 7,000 users of the Woolwich Ferry and 14,000 customers of the 108 and 129 bus routes. These recipients also received a further email in the last two weeks of the consultation period.

During the consultation delivery we carried out periodic interim analysis of participation rates amongst different demographics. Our analysis identified women and those from an ethnic minority group were relatively under-represented amongst consultation respondents to date. As a result, we sent targeted newsletters to 49,000 women and people from ethnic minority groups who are registered with our Have Your Say platform<sup>2</sup>. The consultation also featured in our Taxi & Private Hire weekly newsletter to drivers and licensees.

Over 1,100 local, pan-London and national stakeholders received an email notifying them that the consultation had launched and providing social media assets for them to promote the consultation through their own channels. These groups received a further email in the last week of the consultation.

## **Media activity**

We published a press release when the consultation launched. The consultation also featured as articles in the London Standard (formerly Evening Standard), the Metro and City AM, BBC News (online and televised) and ITV London local bulletins (online and televised).

We targeted advertising in the following local newspapers in east and southeast London boroughs.

- Barking & Dagenham Post
- Bromley News Shopper
- Docklands & East London Advertiser
- East London & West Essex Guardian
- Greenwich & Lewisham Weekender
- Ilford & Woodford Recorder Series
- Islington & Hackney Gazette
- Newham Recorder
- Romford Recorder
- Southwark News
- Waltham Forest Echo

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<sup>2</sup> In addition to our own direct messaging to under-represented demographics, we also carried out engagement with representative stakeholder groups to request that the consultation be promoted through their channels.

- Wharf Life

Each title hosted consultation promotional adverts in two editions, towards the beginning and end of the consultation period respectively.

We also advertised in [OnRoute](#), TfL’s magazine for taxi and private hire vehicle drivers.

### On-site advertising

We sent posters and leaflets to libraries and community hubs in the boroughs close to the tunnels, as well as displaying posters at rail, London Underground, Elizabeth line and DLR stations in these areas. We also handed out over 6,000 flyers over 13 sessions in Greenwich, Newham and Tower Hamlets to promote the consultation and talk to members of the public about the proposals. In addition, we handed out flyers to taxi and private hire drivers.

### Digital advertising

We ran an extensive social media campaign through TfL social media channels and paid-for social media. This was across Meta channels (Facebook and Instagram), X (formerly Twitter) and LinkedIn.

TfL social media		Audience reach
	Facebook	18,900
	LinkedIn	15,000
	X (formerly Twitter)	65,000
Paid-for social media		
	Facebook	6,542,645
	Instagram	
<b>Total</b>		<b>6,641,545</b>

### Meetings with stakeholders

We met with a number of different stakeholder groups during the consultation period, and this is outlined in the table. During these meetings we presented the consultation proposals followed by a discussion based on any follow up questions that the stakeholder had. In addition, we spoke about the consultation with freight groups in a pre-existing weekly call.

**Table 4: Summary of stakeholder briefings and engagements**

Briefing date	Stakeholder name
12 July 2024	LB Newham, LB Tower Hamlets and RB Greenwich
15 July 2024	RB Greenwich
15 July 2024	LB Tower Hamlets
16 July 2024	Inclusive Transport Forum (accessibility groups)
16 July 2024	Greenwich Community Liaison Group
17 July 2014	Freight stakeholders (site visit)
18 July 2024	Silvertown Tunnel Implementation Group
19 July 2024	Business LDN, CBI, FSB, Heathrow, City Airport (site visit)
19 July 2024	LoCITY (freight stakeholders)
19 July 2024	Canary Wharf Group
23 July 2024	London Greener NHS Travel and Transport forum
23 July 2024	Newham Community Liaison Group
24 July 2024	TfL Youth Panel
25 July 2024	RB Greenwich, LB Newham, LB Tower Hamlets
31 July 2024	LB Hackney
31 July 2024	TfL Licensing and Regulation Forum (Taxi trade and PHV industry representatives)
31 July 2024	TfL Technology Forum
8 August 2024	Caroline Russell AM (Green party)
8 August 2024	Newham Chamber of Commerce
8 August 2024	RB Greenwich
8 August 2024	London TravelWatch
15 August 2024	Inclusion London – DDPO
16 August 2024	Motorcycle groups (including Motorcycle Action Group)
19 August 2024	Daniel Francis MP
19 August 2024	LB Southwark



## Consultation Report (Silvertown & Blackwall tunnels user charge)

20 August 2024	Kent County Council
20 August 2024	City Bridge Trust
22 August 2024	Greenwich Peninsula stakeholders
28 August 2024	TPH Licencing and Regulation Forum
28 August 2024	TPH Technology Forum
28 August 2024	LB Tower Hamlets
29 August 2024	LB Newham
29 August 2024	We Are Possible (Clean Air Coalition)
30 August 2024	National Highways

### Protected Characteristic groups

To encourage participation in the consultation from protected groups, we targeted groups through local newspapers and flyering in the local areas, as well as through email newsletters via Have Your Say. We also targeted residents with emails, leaflets and through face-to-face engagement in the local areas.

Easy Read versions of the consultation document and questions were also produced and made available for participants.

Copies of all publicity and promotional materials can be found in Appendix D.

### 2.8 Equalities Assessment

An Equality Impact Assessment (EqIA) was undertaken for the proposals and a draft of this was published on the consultation webpage. The EqIA identified and examined potential positive and negative impacts the proposals may have on individuals with protected characteristics or who may be disadvantaged in London, together with our project objectives and how we propose to mitigate any negative impacts.

We have updated our initial EqIA to reflect any relevant information received or additional potential impacts identified as part of the consultation process and have published as an appendix to this report.

### 2.9 Analysis of consultation responses

The consultation was analysed by [AECOM](#), an independent consultancy. Where respondents gave their feedback via email and not through the Have Your Say survey, this information was uploaded onto the survey by the TfL Consultation lead and supplied in the final dataset to AECOM.

All multiple-choice survey questions were reviewed and the results tabulated and reported on; the proportions shown for each question exclude respondents who chose not to respond or said 'prefer not to say' to that question.

AECOM analysed the open questions (free text boxes) by assigning – or coding – the points made by each respondent to one or more codes within a code frame. Each code is a point raised by respondents in their response. This enables the same or very similar points to be raised (and expressed in a variety of ways) by multiple individuals to be categorised within the code frame. From this, it is possible to count how many times the same or very similar points have been mentioned by respondents. Each response was coded to one or multiple codes, depending on the number of points shared by the respondent. Codes were grouped thematically. The full code frame can be found in Appendix A.

Quality assurance checks were carried out throughout the process, both by AECOM and by the TfL Consultation team. These quality checks included AECOM conducting regular random checks, totalling at least 10 per cent of all open text data, in order to identify and rectify any issues and to ensure consistency in approach across all the members of the coding team. A second stage verification process was conducted by AECOM on c. 10 per cent of all responses. The TfL Consultation team also undertook checks on a random sample of c. 5 per cent of AECOM's coding, once work had commenced, to ensure that responses had been coded correctly. The team also fully reviewed the codes applied to all stakeholder responses. No significant errors were found during the quality assurance checks

### 3. About the respondents

#### 3.1 Number of respondents

We received a total of 5,361 responses to the consultation. A breakdown of public, stakeholder and campaign responses in table 5.

**Table 5: Who responded to the consultation**

Respondents	Total	%
Public responses	5,045	94
STIG member	11	< 1
Stakeholder responses	98	2
Friends of the Earth organised response	120	2
Routemaster organised response	56	1
We are Possible organised response	31	1
<b>Total</b>	<b>5,361</b>	<b>100</b>

There were 16 consultation submissions that were rejected as they were in breach of our [abusive and threatening behaviour policy](#). These 16 responses are not included in the overall figure of 5,361 consultation submissions. In addition to table 5, we also received two petitions which are included in [Chapter 5](#) of the report.

#### 3.2 How respondents heard about the consultation

We asked respondents the main way they heard about the consultation.

3,972 people responded to this question and a breakdown of how they heard about the consultation is in table 6.

**Table 6: How respondents heard about the consultation**

How respondents heard	Total	%
Email from TfL	1,688	42
Social media	962	24
Read about it in the press	574	15
Other (this includes through stakeholder group networks and word of mouth)	479	12
Saw it on TfL website	154	4
Letter from TfL	48	1
Leaflet	36	1
Poster	31	1
<b>Total</b>	<b>3,972</b>	<b>100</b>

### 3.3 Methods of responding

We received responses in a number of ways, with the majority of respondents using the online consultation survey on Have Your Say. We also offered a ‘quick reply’ option as an alternative to our consultation survey where people could submit comments without the need to complete a full survey. A breakdown of how people responded is in table 7.

**Table 7: Methods of responding to the consultation**

Methods of responding	Total	%
Consultation survey (online)	4,107	77
‘Quick Reply’ option (online)	578	11
Email response	671	12
Postal response	5	< 1
<b>Total</b>	<b>5,361</b>	<b>100</b>

### 3.4 Who responded

We wanted to understand who was responding to the consultation and why they were responding. Breakdowns of who responded are in table 8.

4,183 respondents told us where they were responding from: 23 per cent of respondents were from Greenwich, 11 per cent were from Tower Hamlets and eight per cent were from Newham. Eight per cent of respondents were from outside of London.

**Table 8: Where people are responding from**

Which borough do you live in	Total	%
Barking & Dagenham	89	2
Barnet	31	1
Bexley	392	9
Brent	16	< 1
Bromley	279	7
Camden	27	1
City of London	10	< 1
Croydon	75	2
Ealing	26	1
Enfield	35	1
Greenwich	968	23
Hackney	112	3

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

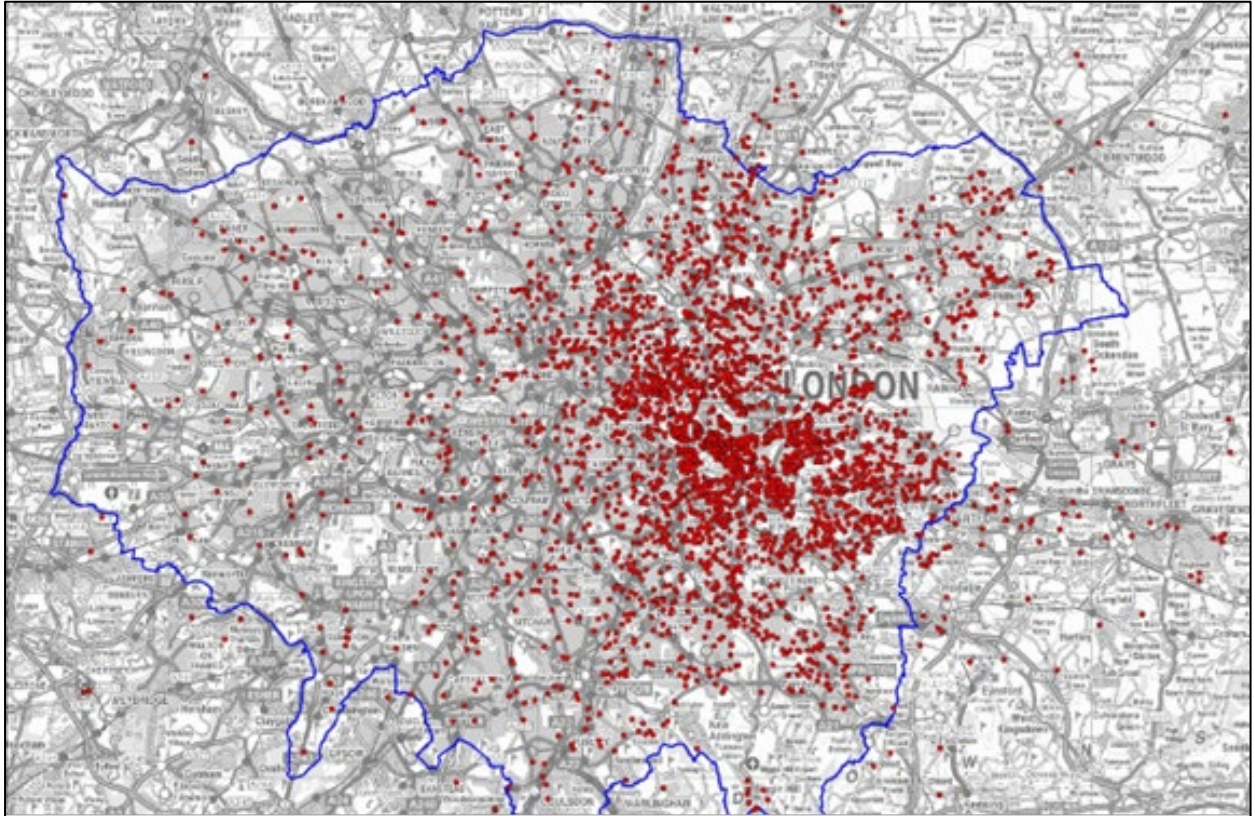
Hammersmith & Fulham	14	< 1
Haringey	28	1
Harrow	14	< 1
Havering	123	3
Hillingdon	12	< 1
Hounslow	11	< 1
Islington	44	1
Kensington & Chelsea	5	< 1
Kingston Upon Thames	12	< 1
Lambeth	42	1
Lewisham	275	7
Merton	23	< 1
Newham	328	8
Redbridge	146	4
Richmond Upon Thames	8	< 1
Southwark	114	3
Sutton	17	< 1
Tower Hamlets	444	11
Waltham Forest	102	2
Wandsworth	27	1
Westminster	21	< 1
I live outside of London	313	8

### **3.5 Postcodes analysis**

Respondents were able to provide postcode data during a registration process (required to take part in the survey) and as part of the survey.

Of the 5,361 total responses received, 5,350 respondents provided a postcode. Figure 1 shows the location of respondents who provided a postcode. Please note that the map focuses on where most respondents were located but excludes some who were located further outside of Greater London.

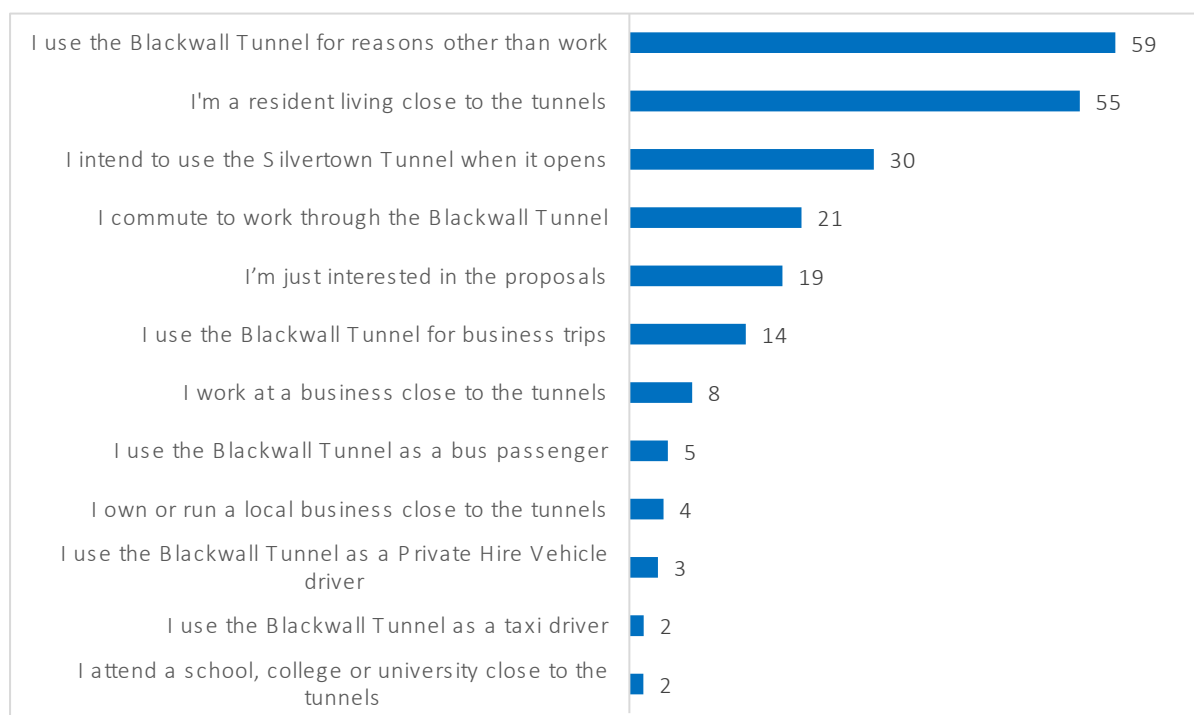
**Figure 1: Map plotting out the postcodes of responders to the consultation**



### **3.6 Motivation to respond**

We asked respondents why they were responding to the consultation. 4,166 gave us a response. The majority use the Blackwall Tunnel for reasons other than work (59 per cent). For this question, respondents were able to select more than one option so some of these respondents may also use the tunnel for commuting or business trips. Figure 2 shows the percentage breakdown for all options.

Figure 2: Why people are responding to the consultation (%)



### 3.7 Visits to our consultation website

Consultation materials were hosted on our online web page at the following address: <https://tfl.gov.uk/tc-yourview>.

We provided the following information in the 'Documents' section:

- A [Supplementary Note](#) setting out more detailed information in support of consultation proposals
- The [User Charge Assessment Framework \(UCAF\)](#) with technical information about our proposals
- A [detailed note on our proposed discounts, exemptions and reimbursements](#)
- The [Charging Policies and Procedures \(CPAP\)](#) document
- A link to the [Development Consent Order \(DCO\)](#) for the Silvertown Tunnel
- A [Statement of Charges](#)
- Easy Read versions of the [consultation information](#) and [survey](#), co-produced with accessibility experts
- [Frequently Asked Questions](#)
- An initial [Equality Impact Assessment \(EqIA\)](#) on the proposals
- A [downloadable version](#) of the standard consultation questions for respondents who may have preferred to respond in writing
- British Sign Language (BSL) video of the [proposals](#) and [survey](#)
- Audio track versions of the [proposals](#) and [survey](#)

We offered a BSL conversation service which would allow the TfL consultation lead to have a two-way BSL translated discussion with the BSL user. To help support London's diverse communities, our [Have Your Say platform](#) is also able to translate our consultation website materials into many different languages.

In addition, we produced a [short video explainer](#) of our proposals that could be viewed on the consultation webpage and the [TfL YouTube channel](#).

We received 69,838 visits to the consultation website during the consultation period and the documents detailed above were downloaded 2,115 times during the eight-week consultation period.



## 4. Statutory consultation - Silvertown Tunnel Implementation Group

### 4.1 Background

The [Silvertown Tunnel Implementation Group](#) (STIG) was set up under the terms of the DCO, and we are required to consult members of STIG on matters defined under these terms.

STIG is made up of the following member organisations:

- City of London Corporation
- Greater London Authority
- London Borough of Barking & Dagenham
- London Borough of Bexley
- London Borough of Bromley
- London Borough of Hackney
- London Borough of Lewisham
- London Borough of Newham
- London Borough of Redbridge
- London Borough of Southwark
- London Borough of Tower Hamlets
- London Borough of Waltham Forest
- National Highways
- Royal Borough of Greenwich
- Transport for London

In addition to the proposed level of the user charge, discounts and exemptions, we are required to consult and / or engage with members of STIG on matters related to updating pre-opening modelling, any highway mitigations that may be required as a result of this, the proposed bus network and the approach to monitoring traffic, environmental and socio-economic effects once the tunnel is open.

We have been meeting with STIG members since September 2020 and have engaged with them throughout the construction of the Silvertown Tunnel. More information, including meeting notes, is on the [Silvertown Tunnel STIG project page](#). These meetings will continue as the Silvertown Tunnel is built and commissioned.

### 4.2 STIG code frame and top issues

We analysed the STIG member consultation responses using the themes and code frame produced based on all consultation feedback.

STIG members raised concerns about the tunnel charges increasing traffic and congestion at other river crossings such as Rotherhithe Tunnel and Tower Bridge. There was a general concern that there were inadequate plans in place for how traffic impacts would be monitored.

Members also raised concerns about public transport, both existing and proposed when the Silvertown Tunnel opens, and some called for the free cross-river cycle shuttle-bus provision to be made permanent. Some members noted that the user

charges in some instances would be cheaper than a bus fare and therefore this would not discourage car use, and therefore would not meet the aims of the Mayor's Transport Strategy. Stakeholders were generally supportive of the green and fair package of concessions and discounts – which includes a bus concession for the first 12 months after the Silvertown Tunnel opens, with only one stakeholder opposing or disagreeing with the proposals. A few other stakeholders asked for the green and fair package of concessions and discounts to be extended beyond the current timescales and made a number of recommendations for further eligibility.

The full code frame for stakeholder responses from STIG members is below in table 9 and a full summary of the STIG responses can be found in [section 4.3](#). Table 10 also show the top six STIG responses with which member commented.

**Table 9: Most frequently raised issues by STIG members by theme**

Theme	STIG responses only
<b>Tunnel user charge levels</b>	
Suggest proposed charges should be higher for cars (an example comment: the charge level for a car should always be higher than a bus fare)	8
Suggest proposed charges should be higher (general comment)	3
Need more information/clarity on charge amounts/timings	3
Oppose/disagree with the proposed charges/charging generally (general comment)	2
Oppose/disagree with proposed charging periods/timings (general comment)	2
Suggest charges should be the same as Dartford Crossing	2
Other reference/comparison to charges for Dartford Crossing	2
Other reference/comparison to charges of Congestion Charge/ULEZ/other charging scheme	2
Other comment/suggestion about the Penalty Charge Notice	2
Support/agree with the proposed charges/support charging (general comment)	1
Oppose/disagree with charge because of the cost-of-living crisis/concern it will add to cost of living	1
Suggest proposed charges should be higher for small vans (general comment)	1
Suggest proposed charges should be higher for heavy goods vehicles (HGVs) (general comment)	1
Suggest proposed charges are too expensive/should be lower for small vans (general comment)	1
Suggest proposed charges are too expensive/should be lower for large vans (general comment)	1

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Suggest proposed charges are too expensive/should be lower for heavy goods vehicles (HGVs) (general comment)	1
Suggest should only charge to use tunnels for a set period of time/until they have been paid for	1
Need more information about why charges are needed/need more justification	1
Other suggestion for how charges should be calculated/applied	1
Suggest charges should apply to all River Thames crossings/shouldn't only charge for east London crossings	1
Suggest charges should be applied to other east London crossings (e.g. Rotherhithe, Tower Bridge)	1
Concern about rising charges for tunnels/suggest keeping at fixed rate for a period of time	1
Suggest reviewing charges for tunnels after a set period of time	1
Other comment/suggestion about Autopay	1
<b>Impacts</b>	
Oppose/concern the proposals will increase levels of traffic and congestion. Question whether this is compatible with the Mayor's Transport Strategy and that the consultation has lacked clarity on how this will be monitored	8
Concern proposals will not encourage car users to use other forms of transport/reduce car use/ is incompatible with Mayor's Transport Strategy	6
Concern the proposals will increase use of Tower Bridge/increase congestion there	3
Concern the proposals will increase use of Rotherhithe Tunnel/increase congestion there	2
Concern the proposals will increase use of Woolwich Ferry/increase congestion there	2
Concern scheme/charging will negatively impact those on lower incomes	1
Concern scheme/charging will negatively impact the economy/London	1
Concern scheme/charging will negatively impact delivery companies/couriers	1
Concern scheme/charging will force people out of employment/cause them to change employment	1
Oppose/concern that proposals/scheme is unfair to those living in/travelling from East/South-East London/will not improve travel for them	1
Concern the proposals/scheme will not make a difference to environmental impact/levels of pollution	1
Concern scheme/charging will negatively impact those who are reliant on using cars/don't have viable alternatives	1

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Concern proposals will encourage/increase car use	1
Support proposals as will reduce/improve levels of traffic/congestion/journey time in the surrounding area/generally	1
Concern the proposals will increase levels of traffic/congestion/journey time for those using the tunnels	1
Concern the proposals will increase use of other crossings/congestion at those (general comments)	1
<b>Discounts and exemptions</b>	
Support/agree with proposed 50% discount for east London low-income residents (general comment)	3
Suggest proposed 50% discount for east London low-income residents should be extended beyond three years/should be applied for a longer period	3
Other suggestion for business discount amount/other comment about business discount on standard off-peak charges	2
Support/agree with proposed 100% discount for Blue Badge holders	2
Support/agree with emergency services vehicles not being charged/being exempt	2
Support/agree with proposed NHS patient reimbursement	2
Support/agree with proposed NHS staff reimbursement	2
Oppose/disagree with the proposed discounts (general comment)	1
Discounts/eligibility is not clear/should be clearer (general comment)	1
Other suggestion for who should receive a discount	1
Queries about what a low-income resident is/eligibility criteria should be clearer	1
Other comment about eligibility/discounts for low-income residents	1
Other comment about discounts for residents	1
Support/agree with proposed £1 business discount on standard off-peak charges (general comment)	1
Suggest the proposed business discount is extended to those outside the host boroughs	1
Suggest proposed business discount should apply to peak as well as off-peak times	1
Other comment about eligibility/proposed 100% discounts	1
Support/agree with the proposed exemptions (general comment)	1
Oppose/disagree with the proposed exemptions (general comment)	1
Support/agree with taxis (black cabs) not being charged/being exempt	1

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Oppose/disagree with taxis (black cabs) not being charged/being exempt	1
Support/agree with NHS vehicles that are exempt from vehicle tax not being charged/being exempt	1
Suggest key workers should not be charged/should be exempt (including NHS staff, care workers, emergency service staff)	1
Other comment about proposed NHS patient reimbursement	1
Oppose/disagree with proposed NHS staff reimbursement	1
<b>About the consultation</b>	
More information needed on proposals/proposals are not clear (general comment)	3
Suggest further consultation/engagement needed	1
<b>Other comments</b>	
Suggest bus service/public transport provision needs improving/increasing links for those affected	7
Suggest free cross-river cycle shuttle-bus provision should be made permanent	5
Suggest bus concession to support local residents using new cross-river bus services should be made permanent	5
Other comment about proposed green and fair package and supporting measures	3
Suggest encouraging more use of active travel/buses using the tunnels/restricting car use and prioritising tunnels for active travel/buses	3
Support/agree with proposed free cross-river cycle shuttle-bus provision for at least 12 months	2
Suggest free DLR journeys between Cutty Sark - Island Gardens and Woolwich Arsenal - King George V should be made permanent	2
Suggest cycling provision needs improving	2
Other (does not fit into codeframe)	2
Support/agree with proposed new zero-emission buses crossing the river at peak times	1
Suggest improvements to DLR	1
Concern about the condition of the Rotherhithe Tunnel/suggest it needs improving	1
Suggest reducing public transport fares/encouraging more people to use public transport	1
Out of scope comment/unrelated to proposals and not captured elsewhere	1
Suggest the Silvertown Tunnel is not needed/feel it should not have been built	1

**Table 10: Top issues raised by STIG and which members commented**

Theme	STIG member	Number of responses
Oppose/concern the proposals will increase levels of traffic and congestion. Question whether this is compatible with the Mayor's Transport Strategy and that the consultation has lacked clarity on how this will be monitored	London Borough of Lewisham, London Borough of Bexley, Royal Borough of Greenwich, London Borough of Waltham Forest, London Borough of Southwark, London Borough of Newham, National Highways, London Borough of Hackney	8
Suggest proposed charges should be higher for cars (an example comment: the charge level for a car should always be higher than a bus fare)	London Borough of Lewisham, Royal Borough of Greenwich, London Borough of Waltham Forest, London Borough of Southwark, London Borough of Redbridge, London Borough of Newham, London Borough of Hackney, City of London Corporation	8
Suggest bus service/public transport provision needs improving/increasing links for those affected	London Borough of Bexley, Royal Borough of Greenwich, London Borough of Waltham Forest, London Borough of Newham, London Borough of Hackney, City of London Corporation, London Borough of Tower Hamlets	7
Concern proposals will not encourage car users to use other forms of transport/reduce car use/is incompatible with Mayor's Transport Strategy	London Borough of Lewisham, London Borough of Bexley, London Borough of Waltham Forest, London Borough of Southwark, London Borough of Newham, London Borough of Hackney	6
Suggest free cross-river cycle shuttle-bus provision should be made permanent	London Borough of Bexley, Royal Borough of Greenwich, London Borough of Hackney, City of London Corporation, London Borough of Redbridge	5
Suggest bus concession to support local residents using new cross-river bus services should be made permanent	London Borough of Bexley, Royal Borough of Greenwich, London Borough of Waltham Forest, London Borough of Hackney, City of London Corporation	5

### 4.3 Summary of STIG stakeholder responses

Responses from STIG members have been summarised below. All stakeholder responses have been read in full and have been used to inform our decision-making process. Where further information has been requested, we will continue to engage with members through STIG and the ongoing meetings scheduled as the Silvertown Tunnel progresses.

### City of London Corporation

The City of London Corporation raised concerns about the impact of the tunnel charges on Tower Bridge, stating that it is important that traffic on the bridge does not increase because of the charges on both Silvertown and Blackwall tunnels. It suggested that TfL work with the Bridge House Estate to develop a mitigation strategy.

The City of London Corporation noted that it uses freight consolidation for new developments and that the location of consolidation centres means that routing will often be via these crossings. Therefore, they suggested the charges for goods vehicles should be reduced in recognition of the essential nature of these modes of transport, and to reduce freight traffic through consolidation. They added that a reduction would also encourage goods vehicles to use the most appropriate crossings, rather than diverting to alternative routes, including Tower Bridge. If additional revenue generation is required to offset reduction in the charge for goods vehicles, the Corporation suggested that this could be met through a modest increase in charges for cars.

The City of London Corporation stated the importance of promoting the use of buses and cycles as an alternative to car travel; while the free cross-river public transport and cycle buses are welcome, the Corporation stated TfL should make a commitment to retain these services and discounts for as long as necessary. Additionally, the Corporation suggests that a simple, smart approach to road user charges is needed for all charges.

### London Borough of Bexley

The London Borough of Bexley stated that Londoners in east London should have parity with west London, noting that west London in general has more affluent areas and has no charges for river crossings. They argued charging east Londoners would create a two-tier city and increase inequalities. The borough stated discounts should be extended beyond the host boroughs to all residents and businesses in adjacent boroughs on the A2 approach to the tunnels from the southeast of London, including Bexley.

The borough stated that the proposed 50 per cent discount for those on low-incomes should be extended beyond three years. The borough also suggested the proposed free public transport offer should be extended to boroughs that neighbour the host boroughs and should be extended beyond a year, to support modal shift.

The borough stated that the consultation documentation did not include detailed information on traffic modelling and asked how TfL has calculated the different charges and exemptions. They also asked for further clarity on monitoring and review plans.

### London Borough of Hackney

The London Borough of Hackney raised concerns that the proposed charges are incompatible with the Mayor's Transport Strategy ambition to reduce traffic by 2030. It stated its concern at the lack of support for sustainable transport within the charging package, citing that taking a bus through the tunnel will be more expensive than an off-peak journey in a private car. The borough stated public transport should always

be the less costly option compared to private car travel. It also suggested the concession package is unbalanced as bus, cross-river cycle shuttle-bus and DLR concessions are scheduled to end after one year, whereas user discounts applying to car travel are not time limited. The borough stated the proposals fail to incentivise public transport and active travel over cars.

The borough suggested the charges could increase traffic levels because of increased capacity through the Silvertown Tunnel. It suggested the project's monitoring and mitigation strategy does not protect Hackney residents sufficiently from the potential negative impacts of increased traffic, and therefore stated it would like to see more commitment to monitoring and mitigation within Hackney.

#### London Borough of Lewisham

The London Borough of Lewisham explained that the Street Environmental Services have two sites in east London, and vehicles currently use the Blackwall Tunnel to access these disposal locations multiple times a week. There would be an increased cost to their operations with the proposed charges, and the borough also noted its intention to increase one of its refuse services, which would mean a greater financial burden. To mitigate against this, they argued that they should be included in the 100 per cent discount for certain operational vehicles used by host boroughs.

The borough stated its concerns around the Silvertown Tunnel conflicting with the Mayor's Transport Strategy and regarding the impact on local traffic patterns, environmental sustainability and efficacy of user charging mechanisms. The Council stated the new tunnel would induce additional driving journeys and suggested the proposed charges may not be sufficient to reduce congestion. They argued the user charges are set too low to effectively discourage driving and are comparable to public transport fares, citing the off-peak user charges being lower than a bus fare. They argued the range of discounts appears to subsidise driving more than sustainable transport modes.

The borough also stated their concerns that user charging would lead to traffic displacement to the Rotherhithe Tunnel, Tower Bridge or Woolwich Ferry, which would undermine the purpose of the Silvertown Tunnel. Regarding the proposal for only one PCN per day, the borough stated this could result in multiple journeys without paying the charge. Concerns were also raised about the decision-making process for future changes to user charge pricing and lack of clarity on the monitoring regime for the proposals.

Also raised was the matter of HGV restrictions at Kidbrooke Park Road, noting TfL's position that monitoring and evaluation of the Silvertown Tunnel will inform the approach to these HGV restrictions. The borough stated its preference for the restrictions to be considered sooner.

#### London Borough of Newham

The London Borough of Newham recognised the proposed user charges for both the Silvertown and Blackwall tunnels would be key to managing traffic demand and stated that it is essential the charge be set at levels that achieve this and adapted when necessary. They requested TfL conduct a review as soon as possible when it has an



initial comprehensive set of data to ensure the charge is set correctly and meeting the commitment of effective traffic management.

The borough noted the off-peak charge for cars is cheaper than the current bus fare and urged no travel by private motor vehicle should be cheaper than a public transport fare. They requested the bus concession and other measures in the green and fair package of concessions and discounts be committed to for at least three years. The borough also commented bus service provision through the tunnels is less than scoped and presented during earlier stages of the project. The borough stated localised mitigations should be developed, suggesting any increase in vehicle capacity should be reallocated to sustainable modes, to prevent inducing further general traffic. They also asked that further funding is allocated to the host boroughs for the development of project mitigations.

#### London Borough of Redbridge

The London Borough of Redbridge noted the off-peak charge for cars is cheaper than a bus fare, stating the pricing of public transport needs to be considered in the future to ensure the Mayor's Transport Strategy ambitions for mode shift to more sustainable modes will be met with the introduction of the tunnel user charging. They also noted no user charging has been installed at west London crossings and suggested charges be removed once the Silvertown Tunnel construction costs have been repaid, or any additional funding reinvested into public transport in east London.

The borough broadly agreed with the eligibility list for the 100 per cent discount, those listed for exemptions and the reimbursement proposals. However, they asked TfL to consider other public sector workers, especially those in neighbouring boroughs. The borough also commented the 50 per cent discount for east London low-income residents should be made permanent and the £1 business discount be extended to small businesses in other east London boroughs. They suggested the free cross-river cycle shuttle-bus should be extended beyond one year.

#### London Borough of Southwark

The London Borough of Southwark raised concerns about the potential displacement of traffic to Rotherhithe Tunnel, Tower Bridge and Southwark roads because of the proposed charges. They questioned the traffic modelling and stated the borough had previously suggested also charging Rotherhithe Tunnel to mitigate potential traffic displacement and asked that this be considered again. They also asked TfL to consider the future of Rotherhithe Tunnel, both for maintenance and repurposing for active travel only, and for TfL to review the modelling data for the impact on Southwark roads (e.g. Lower Road).

The borough stated the proposals would not help TfL or Southwark meet the Mayor's Transport Strategy ambitions in their current form, noting some of the proposed off-peak charges are cheaper than a public transport alternative, which will not encourage mode shift or reduce car dependency. They stated the proposed charging structures are too complex as there are too many discounts proposed, and the suggested discounts for driving are proposed for a longer period compared to the DLR and bus concessions.

The borough stated not enough explanation had been provided on proposed timings and direction for charges and questioned the choice to not charge in the evenings. They suggested only charging one PCN per vehicle per day would weaken the deterrent effect in managing motor traffic. Additional information on the rationale for timings and charge structures was requested. The Borough stated it would prefer simpler charging proposals, similar to the Dartford Crossing, and with more targeted benefits. They suggested the NHS exemptions should be reduced, and only include emergency vehicles which it suggests should be extended to all emergency vehicles. They suggested removing the taxi exemption and added the funding saved by reducing the number of discounts and exemptions encouraging driving would enable TfL to invest more in measures to encourage greater modal shift in the affected local boroughs. They also suggested TfL keep the charges and traffic monitoring in review and adapt the charges if necessary.

#### London Borough of Tower Hamlets

The London Borough of Tower Hamlets raised concern that no justification has been provided for operating the tunnels without charges between 22:00 – 06:00. It argued there would be substantial traffic flows during this period, linked to the night-time economy and events, and suggested income raised during these times could be utilised to offset against the cost of the subsidy package. It also stated concern the transition from free of charge to full peak rate 6am may lead to localised congestion and poor driver behaviour.

They added the overall support package should be extended beyond the proposed time frames and noted concern the current expectation is for all users to pay the charges once those periods have expired, regardless of consultation feedback and monitoring.

The borough supported the proposed business discount, however stated it should also apply during peak-hours, so businesses reliant on the tunnels can efficiently operate. They welcomed the package of 50 per cent discounts on peak and off-peak charges for eligible low-income residents, however argued there needs to be a longer-term mechanism in place, as the tunnel charges will impact the surrounding road network and communities beyond that period. They also suggested a thorough communications strategy, targeting residents and businesses eligible for discounts and stating the importance of applying for Auto Pay.

The borough included comments on the green and fair public transport package and stated they would want to see the subsidy periods extended. They also noted their involvement in the eventual 12-month review but questioned the extent of it and the Silvertown Tunnel Implementation Group's (STIG) ability to influence the review period. Greater assurance regarding the borough's ability to influence STIG and the TfL Board decision was requested.

#### London Borough of Waltham Forest

The London Borough of Waltham Forest noted broad support for the proposed exemptions for Blue Badge holders, NHS patient reimbursement and the discounts for low-income residents in the borough.

Concerns were raised that the proposals conflict with the Mayor's Transport Strategy (MTS) ambition to reduce private vehicle usage and encourage mode shift to more sustainable means. They suggested the proposed charges and timings make driving the more attractive choice over public transport, especially with the public transport concessions limited to a 12-month period and certain groups of people. It was noted the proposed off-peak charge for cars and vans is cheaper than a bus fare, and questioned whether this, in addition to increased capacity, will encourage driving. They requested TfL reconsider the proposed user charging schedule to ensure that it aligns more closely with the MTS goals and further supports sustainable transport options. The borough stated TfL should provide a clear plan for monitoring and reviewing of traffic and user charges over the next few years and should detail how TfL intends to prevent significant increases in traffic. They also commented on bus service provision and the cross-river cycle shuttle-bus service, noting the importance of sufficient provision to encourage mode shift over driving.

### National Highways

National Highways stated interest in whether the proposed charges would affect traffic levels at the Dartford Crossing or the surrounding network. Noting the forecast data in the Draft User Charges Assessment Framework, they asked whether there was any data on variations of traffic through the Dartford Crossing at peak times. Additional clarification was also requested regarding the impact on other strategic routes near the River Thames.

Regarding the Monitoring and Mitigation Strategy, National Highways asked that the monitoring implemented provides suitable data for any impacts on the Dartford Crossing and wider strategic road network to be identified when the Silvertown Tunnel comes into use.

### Royal Borough of Greenwich

The Royal Borough of Greenwich stated concern the proposed charging structure does not align with the Mayor's Transport Strategy, as there is a lack of parity between sustainable transport modes and cars, especially with the public transport concessions being offered for a limited time. They stated the proposed charge for cars should be more than a bus fare and at a rate above £1.50. The borough also suggested HGVs should be charged at least £10, 24 hours per day, or even more during peak hours, adding reducing HGV traffic in Greenwich and promoting modal shift of freight to river and rail must be a key objective.

The borough supported the exemptions and reimbursements for NHS workers, licensed taxis, emergency vehicles and Blue Badge holders. They suggested only residents in the host boroughs on low-incomes should be eligible for exemptions, and these residents must prove that their car use is essential over public transport. The borough added charge exemptions should mirror those of the Dartford Crossing, and residents could apply for a discount if they pay council tax to Newham, Tower Hamlets or Greenwich. They also asked for further data on different discount levels and eligibilities for both residents and businesses and suggested the business discount should only apply to local businesses in the host boroughs with essential travel needs.

The borough asked TfL to monitor the traffic impacts on the Woolwich Ferry. Additional modelled traffic data on other strategic routes and regarding levels of particulate matter were requested. It also questioned how effective the charges would be at meeting the costs of tunnel construction and how long it would take to fully pay off the construction costs.

## 5. Summary of public responses

### 5.1 Usual mode of travel across the River Thames in east London

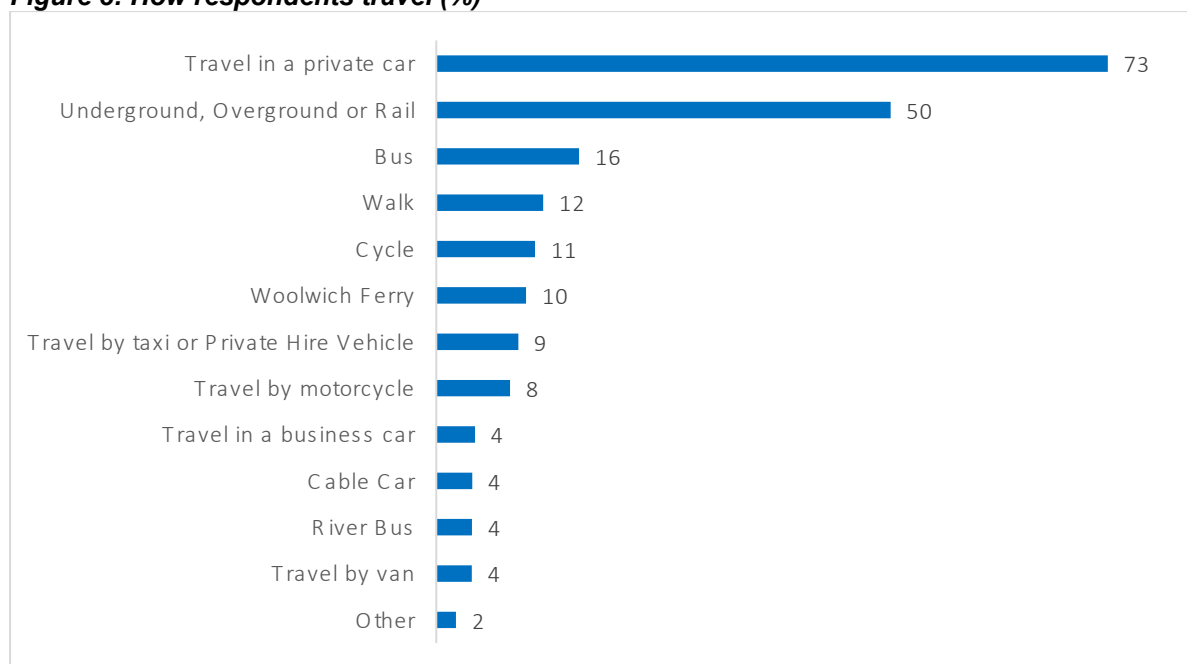
4,090 people responded to this question.

We asked people for their usual mode of travel across the River Thames in east London. Respondents could choose more than one option.

73 per cent of people responded that they travel in private car, with 50 per cent travelling by London Underground, London Overground or Rail.

The figure below shows the percentage breakdown for all options.

**Figure 3: How respondents travel (%)**



We analysed the responses to this question against the demographic data respondents gave us. We found the following statistically significant differences:

- People aged 25 years and under were more likely to use the London Underground, London Overground or Rail (73 per cent) compared to people aged over 25 years (49 per cent)
- Respondents from Black, Asian and Other Ethnic Groups were more likely to use the bus (20 per cent), compared to White respondents (13 per cent)

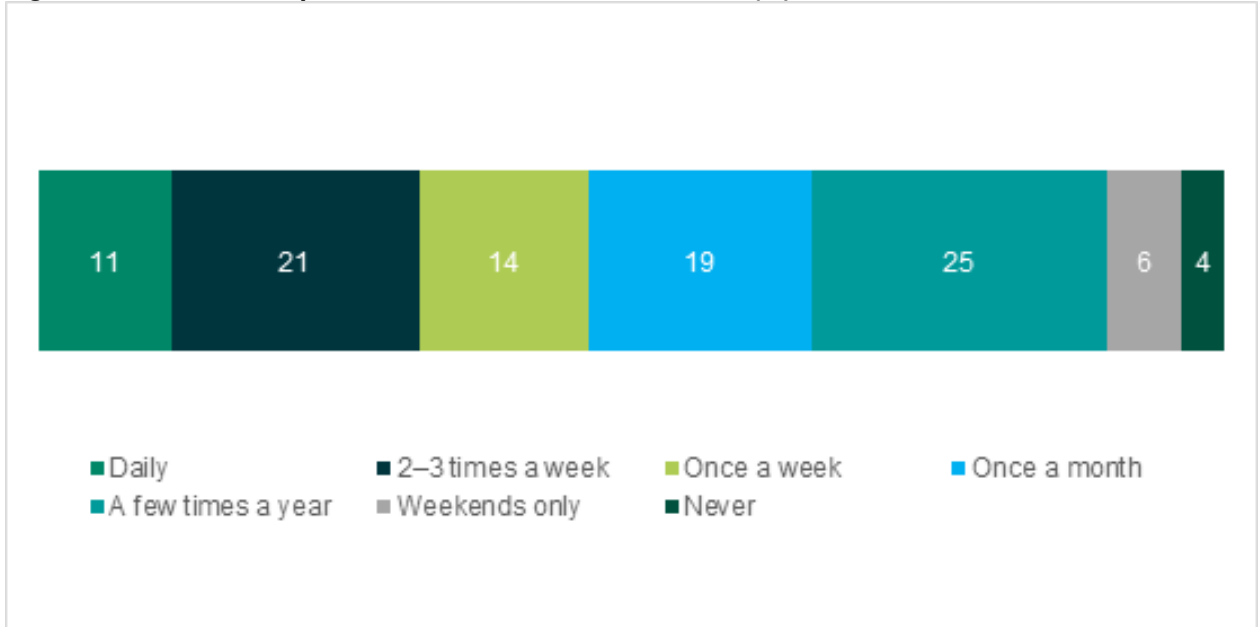
### 5.2 Current usage of the Blackwall Tunnel

4,038 people responded to this question.

We asked respondents how often they currently use the Blackwall Tunnel. 46 per cent of respondents use the tunnel at least once a week, 11 per cent use the tunnel every day and six per cent only use the Blackwall Tunnel at the weekend.

The figure below shows the percentage breakdown for all options.

**Figure 4: How often respondents use the Blackwall Tunnel (%)**



We analysed the responses to this question against the demographic data respondents gave use. We found the following statistically significant differences:

- Respondents aged between 26 and 55 were more likely to use the Blackwall Tunnel at least weekly (56 per cent) than those aged 56 and over (39 per cent)
- Black, Asian and Other Ethnic Group respondents were more likely to use the Tunnel 2-3 times a week or more (38 per cent) than White respondents (24 per cent)

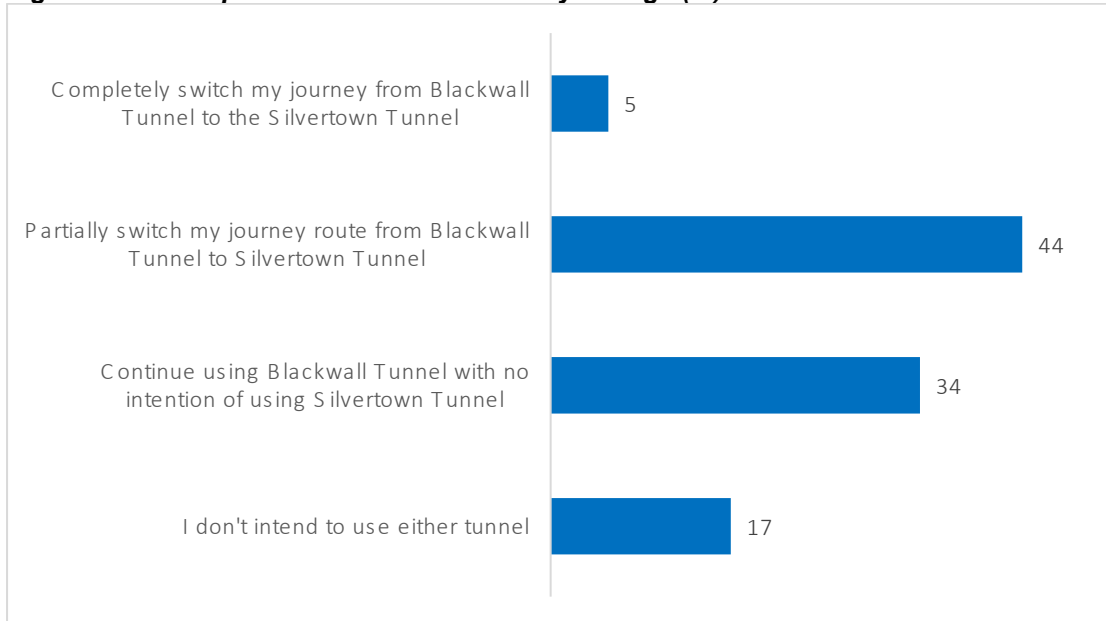
### 5.3 Future travel intentions when the Silvertown Tunnel opens

4,014 people responded to this question.

We asked respondents which statement best met their future travel intentions when the Silvertown Tunnel opens. 44 per cent of respondents' intent to partially switch their journeys from the Blackwall Tunnel to the Silvertown Tunnel and 34 per cent of respondents have no intention of switching their journeys from the Blackwall Tunnel to the Silvertown Tunnel.

The figure below shows the percentage breakdown for all options.

**Figure 5 How respondents' travel habits may change (%)**



We analysed the responses to this question against both the demographic data respondents gave use and their responses to question 6. We found the following statistically significant differences:

- Respondents aged 25 and under were more likely to say that they do not intend to use either tunnel (29 per cent) than those in older age groups (16 per cent)
- Respondents who travel exclusively across the River Thames in east London in a private car were more likely to say that they intend to continue using the Blackwall Tunnel and do not intend to switch to the Silvertown Tunnel (43 per cent) than those who use other transport modes
- Respondents who travel exclusively across the Thames in east London by public transport were more likely to say that they intend to completely switch their journey from the Blackwall Tunnel to the Silvertown Tunnel (11 per cent) than users of other transport modes

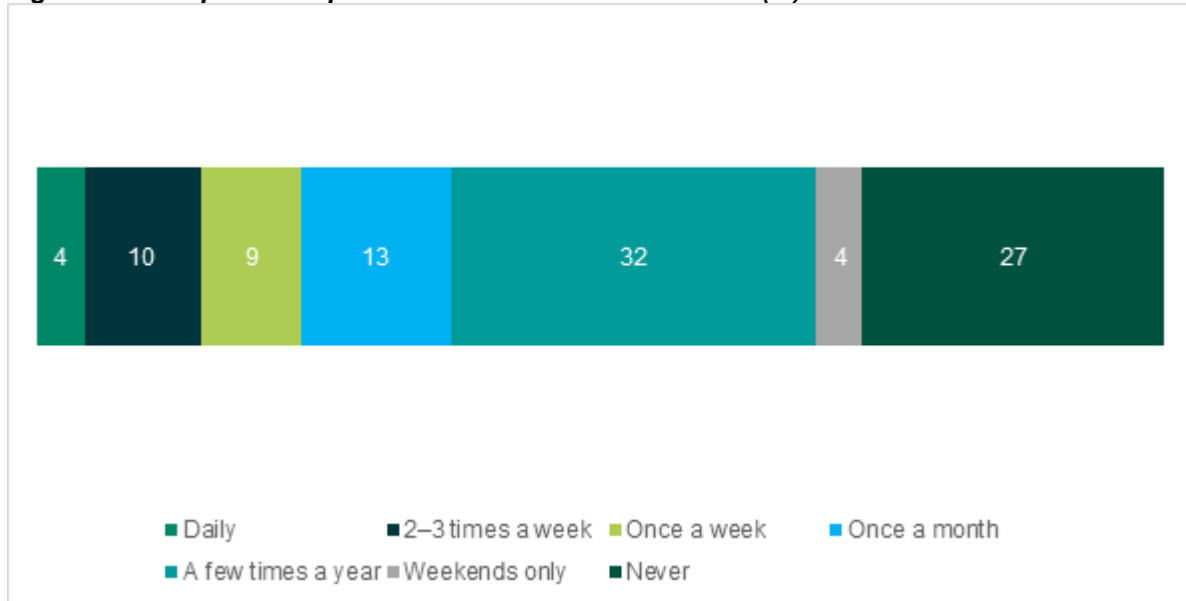
#### **5.4 Intended usage of the Silvertown Tunnel when it opens**

4,038 people responded to this question.

We asked respondents how often they intended to use the new Silvertown Tunnel when it opens. 32 per cent of respondents said they would use the new tunnel a few times a year, with 27 per cent of respondents saying they would never use the new tunnel.

The chart below shows the percentage breakdown for all options.

**Figure 6 Do respondents plan to use the Silvertown Tunnel (%)**



We analysed the responses to this question against the demographic data respondents gave us. We found the following statistically significant differences:

- Black, Asian and Other Ethnic Group respondents have a greater intention to use the Silvertown Tunnel at least once a week or more (31 per cent) than White respondents (17 per cent).

### **5.5 Future intention to use new public transport options when the Silvertown Tunnel opens**

3,620 people responded to this question.

We reminded respondents of the new public transport benefits we are proposing when the Silvertown Tunnel opens. We asked respondents whether they intended to use the new public transport options when they are available.

77 per cent of respondents do not intend to use the new public transport options and 33 per cent of respondents do intend to use them.

We analysed the responses to this question against both the demographic data respondents gave us and their responses to questions 6 and 7. We found the following statistically significant differences:

- Respondents aged under 35 were more likely to say that they intend to use new public transport options (28 per cent) compared to those aged between 46 and over (19 per cent)
- Respondents who use the Blackwall Tunnel at least weekly were more likely to say that they did not intend to use the new public transport options (77 per cent) than those who never use the Blackwell Tunnel or use it a few times a year (55 per cent)
- Respondents who exclusively travel across the River Thames in east London by private vehicle were more likely to say that they did not intend to use the



new public transport options (85 per cent) than those who travel by public transport and active travel.

## **5.6 Current and intended usage of Auto Pay accounts**

4,047 people responded to this question.

We reminded respondents that they would be able to pay the charges for both tunnels using Auto Pay. We asked whether respondents already had an Auto Pay account.

30 per cent of respondents do already have an account, 30 per cent do not but intend to register for a free account, and 40 per cent of respondents do not have an account and do not intend to register for a free Auto Pay account.

We analysed the responses to this question against both the demographic data respondents gave us and their responses to question 7. We found the following statistically significant differences:

- Respondents aged 26 and above were more likely to have an Auto Pay account (32 per cent) than those aged 25 and below (14 per cent)
- Respondents who travel through Blackwall Tunnel at least monthly were more likely to have an Auto Pay account (33 per cent) than those who travel through less frequently (21 per cent)

## **5.7 Proposed level of user charges**

We gave respondents an open text box to give us their feedback on our proposed charge levels, as outlined in the consultation materials and reiterated in the consultation survey.

4,765 people responded to this question.

We found that members of the public were more likely to make statements opposed to the charge (34 per cent, or 1,548 comments) than stakeholders, and 16 per cent (709 comments) responded that the charges are a way to make more revenue for TfL. Members of the public, stakeholders and the 'We are Possible' campaign all raised this disparity between charging for river crossings in east London but not in west London.

Table 11 shows the most frequent comments from the responses, which are the top 10 codes. This is split out into public comments, stakeholder comments and campaign comments.

The full code frame with all comments can be found in Appendix A.

**Table 11: Top 10 issues**

Theme	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
Oppose/disagree with the proposed charges/charging generally	1,531	0	0	0	17	1,548
Oppose/concern that proposals are unfair to those living in/travelling from East/South-East London	855	0	31	0	18	904
Suggest proposed charges are too expensive/should be lower	783	0	0	0	10	793
Oppose proposals as it is just a revenue-raising project for TfL/waste of resources	705	0	0	0	4	709
Oppose/disagree with charging to use the Blackwall Tunnel	679	0	0	0	9	688
Concern proposals/charging will negatively impact commuters/those travelling to/from work	565	0	0	0	19	584
Reference/comparison to the Congestion Charge/ULEZ/other charges	495	0	0	18	22	535
Suggest charges should apply to all River Thames crossings/shouldn't only charge for east London crossings	424	0	31	0	7	462
Oppose/concern that the project unfairly target/penalise motorists	405	0	0	0	8	413
Concern proposals/charging will negatively impact those on lower incomes	394	0	0	0	9	403

## 5.8 Proposed package of discounts, exemptions and reimbursements

We gave respondents an open text box to give us their feedback on our proposed discounts and exemptions, as outlined in the consultation materials and reiterated in the consultation survey.

2,950 responded to this question.

Members of the public and stakeholders stated that the discounts should apply for all residents living close to the tunnels, though there was support generally for the proposed package of exemptions. There were suggestions for motorcycles to be

exempt from the charge, and for zero-emission/less polluting vehicles to be exempt too.

Table 12 shows the most frequent comments from the responses, which are the top 10 codes. This is split out into public comments, stakeholder comments and campaign comments.

The full code frame with all comments can be found in [Appendix A](#).

**Table 12: Top 10 issues**

Theme	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
Suggest discounts should be for all residents local to tunnels/living in the surrounding area	527	0	0	0	6	533
Support/agree with the proposed exemptions	210	120	0	0	4	334
Suggest residents local to tunnels/living in the surrounding area should be exempt	327	0	0	0	4	331
Suggest motorcycles/mopeds/motor tricycles should be exempt	298	0	0	0	4	302
Support/agree with the proposed discounts	217	0	0	0	5	222
Oppose/disagree with the proposed discounts	177	0	0	0	2	179
Oppose/disagree with taxis (black cabs) being exempt	178	0	0	0	1	179
Concern proposals are unfair as only offers discounts to east London residents/should consider south London residents	169	0	0	0	1	170
Support/agree with vehicles in the disabled tax class being exempt	33	120	0	0	2	155
Support/agree with proposed 50% discount for east London low-income residents	25	120	0	0	6	151

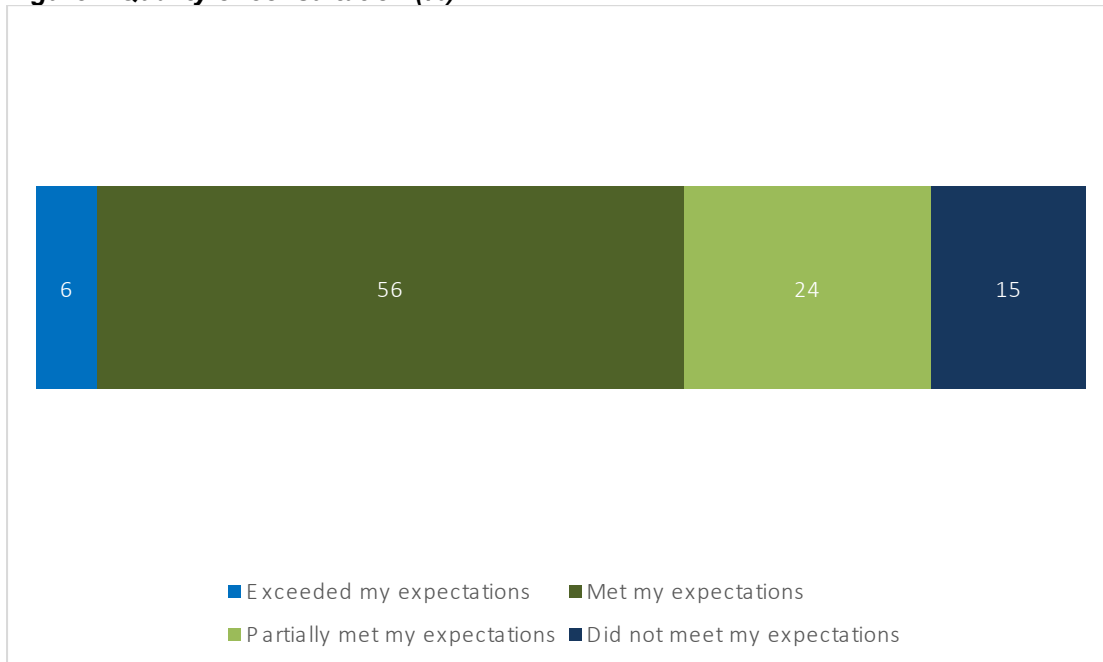
## 5.9 Quality of consultation questions

We asked respondents to choose the statement that best reflected their experience of engaging with our consultation.

4,059 people responded to this question.

62 per cent of respondents felt the consultation met or exceeded their expectations. 15 per cent of respondents felt the consultation did not meet their expectations. The chart below shows the percentage breakdown for all responses.

**Figure 7 Quality of consultation (%)**



We analysed the responses to this question against both the demographic data respondents gave us and their responses to question 7. We found the following statistically significant differences:

- Respondents aged 25 and under were more likely to say that the consultation exceeded their expectations (12 per cent) than those aged over 26 (six per cent)
- Respondents who use the Blackwall Tunnel at least once a week were more likely to say that the consultation did not meet their expectations (17 per cent) than those who use the Blackwall Tunnel less frequently (10 per cent).

We also gave those who responded that the consultation had only partially met or did not meet their expectations the opportunity to give us their views in an open text box.

1,111 people responded to this question.

The top 5 comments from respondents to this question are in table 13:

**Table 13: Top 5 issues**

Code	Frequency of comment
Concern consultation responses will have no/little impact on TfL decisions/just a tickbox exercise	394
Promotion/advertising/awareness of consultation is poor/low/lacking and should be improved	234

Survey was poor quality/design/presentation (general comment)	201
Consultation/questions are biased/leading	186
Criticism of TfL website (general comment)	107

## 5.10 Stakeholder responses

We received responses from the stakeholders listed below. Summaries of STIG stakeholder responses can be found in [Chapter 4](#). Summaries of all other stakeholder responses can be found in Appendix E.

All stakeholder replies have been read and the comments made have been used to inform our decision-making process.

### Silvertown Tunnel Implementation Group

- City of London Corporation
- London Borough of Bexley
- London Borough of Hackney
- London Borough of Lewisham
- London Borough of Newham
- London Borough of Redbridge
- London Borough of Southwark
- London Borough of Tower Hamlets
- London Borough of Waltham Forest
- National Highways
- Royal Borough of Greenwich

### Other local authorities & statutory bodies

- Essex County Council
- Kent County Council
- London Borough of Havering
- Port of London Authority

### Government departments, parliamentary bodies and politicians

- Bexley Labour Group
- Caroline Russell AM
- City Hall Conservatives
- Cllr Ann-Marie Cousins (Royal Borough of Greenwich - Cabinet Member for Equality, Culture and Communities)
- Cllr Rowshan Hannan, East Greenwich ward councillor
- Daniel Francis MP, Bexleyheath and Crayford
- Gareth Bacon MP, Orpington
- Green Group at LB Newham
- Greenwich Conservative Council Group
- Jim Dickson MP, Dartford

- London Assembly Labour Group
- London Assembly Liberal Democrat Group
- Louie French MP, Old Bexley and Sidcup
- Matthew Pennycook MP, Greenwich and Woolwich
- Thomas Turrell AM, Bexley and Bromley

### **Transport and road user groups**

- Association of London Motorists
- British Motorcyclists Federation and the National Motorcyclists Council
- British Vehicle Rental and Leasing Association
- Bromley Cyclists
- Confederation of Passenger Transport UK
- Freedom for Drivers Foundation
- Future Transport London
- London Cycling Campaign
- London TravelWatch
- Motorcycle Action Group
- Newham Cyclists
- Uber Boat by Thames Clippers

### **Air quality and environmental groups**

- Friends of the Earth England, Wales and Northern Ireland

### **Accessibility groups**

- Hackney Living Streets
- Real (Disabled People's Organisation)

### **Freight and logistics groups**

- Association of International Courier & Express Services
- Boleyn Recovery & Fleet Services Ltd
- Brewery Logistics Group
- Destiny Couriers Sameday Ltd
- DHL
- Eddie Stobart Ltd
- Foley & Miles Ltd
- Logistics UK
- London Venue Transfer Ltd
- Momart Ltd
- Road Haulage Association

### **Taxi and private hire groups**

- Excel Executive Ltd
- Licensed Taxi Drivers' Association (LTDA)
- Uber UK

- United Cabbies Group

**Business groups and businesses (local, pan-London and national)**

- Andrew Cross and Co
- Baldwin & Co
- Biggin Hill Floral Studio
- Bluecoat Engineering Ltd
- BusinessLDN
- Bywaters (Leyton) Ltd
- Canary Wharf Group
- Centre Point Food and Wine Ltd
- Cloud and Horse Production Ltd
- Equinox Partners
- Federation of Small Businesses
- Fletcher Wilson Ltd
- Fluid I.T Ltd
- Ickenham Aerials
- John Lewis Partnership
- London Chamber of Commerce and Industry
- London City Airport
- LoveGunn
- Maurice and Doris Ltd
- McCormacks Solicitors
- Midix Ltd
- Newham Chamber of Commerce
- Positive Behaviour Active Support Ltd
- Rapid Office Systems
- Roblett Electrical Contractors
- Royal Docks Medical Practice
- Royal Mail
- Singway 2 Ltd
- South East London Chamber of Commerce (SELCC)
- Surge Cooperative
- The Black Lion
- The Rail & Station Innovation Company
- Unique Venues Consultancy
- Waste-A-Way Recycling Ltd

**Local interest groups, faith groups, schools**

- All Hallows Bow
- Brockley Community Church
- Certain Blacks
- Chobham Academy, Newham
- City Bridge Foundation
- Emmaus Greenwich
- Kingsway International Christian Centre

- Newham Muslim Forum
- Stop the Silvertown Tunnel Coalition
- Woolwich Evangelical Church

## **Others**

- British Security Industry Association
- HMP Belmarsh, Isis and Thameside
- Homecare Association
- RMT

## **5.11 Petitions and campaigns**

### **5.11.1 Petition submitted by Mr Liam Davis on Change.org**

We received a petition from Mr Liam Davis, a member of the public, hosted on Change.org. At the time the consultation closed, the petition had over 28,000 responses (we are aware that the petition remains open).

The petition raised concerns about the proposals, including:

- Geographic inequality
- Risk of traffic displacement
- Economic impact
- Value for money of tolls

It suggested the following alternatives or solutions for 'a more equitable tolling system':

- Uniform tolling across all Thames crossings
- Income-based toll discounts
- Enhanced public transport alternatives

The full 'petition prayer' can be found in Appendix B. Our responses to the issues raised in this petition can be found in Appendix A.

### **5.11.2 Petition submitted by Alex Wilson AM (Reform UK)**

We received a petition from Alex Wilson, Assembly Member for Reform UK. The petition was presented to the Mayor of London, Sadiq Khan, at the London Assembly. It has 3,775 signatures in a combined online and hard copy form.

The petition opposes the proposed 'tunnel tax' on London's drivers and calls on the Mayor and TfL to scrap all proposed charges.

The full 'petition prayer' can be found in Appendix B. Our responses to the issues raised in this petition can be found in Appendix A.

### **5.11.3 Campaign organised by Friends of the Earth**

We received an email campaign organised by Friends of the Earth calling for higher charges for more-polluting vehicles, a review of all east London crossings to allocate



more space for greener travel options, and showing support for discounts for low-income Londoners (120 responses).

For the purpose of the analysis, we have reported this as an organised response campaign. Each response has been read and counted individually in our analysis.

The full verbatim template campaign can be found in Appendix B. Our responses to the issues raised in this campaign can be found in Appendix A.

#### **5.11.4 Campaign organised by We are Possible**

We received an email campaign organised by We are Possible calling for Silvertown Tunnel to be repurposed for public transport and active travel only, and equal tolls across all London bridges and tunnels (31 responses).

For the purpose of the analysis, we have reported this as an organised response campaign. Each response has been read and counted individually in our analysis. Campaigners used a template response but personalised some paragraphs within the response. Any personalised comments were analysed individually.

The template part of the campaign can be found in Appendix B. Our responses to the issues raised in this campaign can be found in Appendix A.

#### **5.11.5 Routemaster buses campaign**

We identified an organised campaign through responses to the online survey on our Have Your Say portal. These called for the addition of Routemaster buses to operate through the tunnels. This was out of scope for this consultation, as we did not consult on bus vehicle types.<sup>3</sup> Other comments made which are in scope of the consultation have been analysed and themes responded to in our response to issues raised.

We classified this as an organised campaign due to the submission pattern and the similarity in their response. While each response was slightly different, they all called for the introduction of Routemaster buses.

For the purpose of the analysis, we have reported this as an organised response campaign. Each individual response has been read and analysed and comments coded accordingly.

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<sup>3</sup> Between November 2022 and January 2023 we held a [public consultation](https://haveyoursay.tfl.gov.uk/silvertown-tunnel-bus-network) on our proposals for a new bus network to serve the Silvertown Tunnel, during which a similar campaign was raised and addressed. Further information is available on the consultation website: <https://haveyoursay.tfl.gov.uk/silvertown-tunnel-bus-network>.

## 6. Appendices

### Appendix A: Detailed Analysis of Comments & Our Response to Issues Raised

#### (i): Code Frame

(Please note that STIG member responses are excluded from and not factored into the counts for stakeholder responses or all responses in this table.)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
<b>Charges/charging - general support</b>						
Support/agree with the proposed charges/support charging (general comment)	257	0	0	1	9	267
<b>Charges/charging - general oppose</b>						
Oppose/disagree with the proposed charges/charging generally (general comment)	1531	0	0	0	17	1548
Oppose/disagree with charging to use the Blackwall Tunnel	679	0	0	0	9	688
Oppose proposals/ as it is just a revenue-raising project for TfL/waste of resources	705	0	0	0	4	709
Oppose/disagree with charge because of the cost-of-living crisis/concern it will add to cost of living	366	0	0	0	7	373
<b>Charges - should be higher generally</b>						
Suggest proposed charges should be higher (general comment)	173	0	0	0	4	177
Suggest proposed charges should be higher for motorcycles/mopeds/motor tricycles (general comment)	4	0	0	0	0	4
Suggest proposed charges should be higher for cars (an example comment: the charge level for a car should always be higher than a bus fare)	28	0	0	0	0	28
Suggest proposed charges should be higher for small vans (general comment)	11	0	0	0	0	11
Suggest proposed charges should be higher for large vans (general comment)	10	0	0	0	0	10
Suggest proposed charges should be higher for heavy goods vehicles (HGVs) (general comment)	39	0	0	0	2	41

Consultation Report (Silvertown & Blackwall tunnels user charge)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
<b>Charges - should be lower generally</b>						
Suggest proposed charges are too expensive/should be lower (general comment)	783	0	0	0	10	793
Suggest proposed charges are too expensive/should be lower for motorcycles/mopeds/motor tricycles (general comment)	44	0	0	0	1	45
Suggest proposed charges are too expensive/should be lower for cars (general comment)	54	0	0	0	0	54
Suggest proposed charges are too expensive/should be lower for small vans (general comment)	23	0	0	0	2	25
Suggest proposed charges are too expensive/should be lower for large vans (general comment)	13	0	0	0	4	17
Suggest proposed charges are too expensive/should be lower for heavy goods vehicles (HGVs) (general comment)	17	0	0	0	5	22
<b>Charging period</b>						
Support/agree with proposed charging periods/timings (general comment)	7	120	0	0	3	130
Oppose/disagree with proposed charging periods/timings (general comment)	44	0	0	0	2	46
Oppose/disagree with having separate peak and off-peak charges/should be the same charges for all	45	0	0	0	1	46
Oppose/disagree with proposed peak charging periods/timings (general comment)	34	0	0	0	2	36
Suggest peak charges should apply at peak times regardless of direction travelling in	55	0	0	0	1	56
Suggest no charges at weekends	54	0	0	0	0	54
<b>Charges - other comments</b>						
Suggest other transport modes should be charged	15	0	0	0	0	15
Suggest should only charge to use tunnels for a set period of time/until they have been paid for	92	0	0	0	4	96
Need more information/clarity on charge amounts/timings	65	0	0	0	5	70

Consultation Report (Silvertown & Blackwall tunnels user charge)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
Need more information/clarity on what vehicles will be affected by charges	23	0	0	0	0	23
Need more information about why charges are needed/need more justification	73	0	0	0	3	76
Suggest charges should be the same as Dartford Crossing	145	0	0	0	9	154
Other reference/comparison to charges for Dartford Crossing	342	0	0	0	12	354
Other reference/comparison to charges of Congestion Charge/ULEZ/other charges	495	0	0	18	22	535
Other suggestion for how charges should be calculated/applied	46	0	0	0	4	50
Other suggestion for charging period/timings	53	0	0	0	3	56
Suggest charges should be higher for petrol/diesel/worst-polluting vehicles/should be lower for less-polluting vehicles	36	120	31	0	3	190
Suggest charges should apply to all River Thames crossings/shouldn't only charge for east London crossings	424	0	31	0	7	462
Suggest introducing annual ticket for crossings (i.e. pay a fee to use the tunnels as much as wanted within year/other set period)	84	0	0	0	1	85
Suggest allowing a number of free/exempt journeys through tunnels within a set period before charging	34	0	0	0	0	34
Suggest charges should be limited to once per day/capped at a daily limit	51	0	0	0	1	52
Suggest charges should be applied to other east London crossings (e.g. Rotherhithe, Tower Bridge)	29	0	0	0	2	31
Concern about rising charges for tunnels/suggest keeping at fixed rate for a period of time	33	0	0	0	2	35
Suggest reviewing charges for tunnels after a set period of time	10	0	0	0	1	11
Suggest only charging for one of the two tunnels (either Silvertown or Blackwall but not both)	8	0	0	0	0	8
Suggest only charging commercial/business vehicles	13	0	0	0	0	13

Consultation Report (Silvertown & Blackwall tunnels user charge)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
Suggest there should be no charge on Sundays and/or bank holidays	9	0	0	0	0	9
Suggest charges are applied for 24/7 (all hours of the day and all days of the year)	5	0	0	0	0	5
Suggest charges should be lower/discounted for return journeys	9	0	0	0	1	10
Suggest charging based on number of miles travelled	6	0	0	0	0	6
Suggest charging all vehicles/users the same amount	8	0	0	0	0	8
Suggest charges should be limited capped per week/month/year	2	0	0	0	0	2
Suggest charges should be higher for those living/travelling from outside of London	10	0	0	0	0	10
Suggest charges should charge be based on the income of the user	3	0	0	0	0	3
<b>Off-peak charges - general support</b>						
Support/agree with the proposed standard off-peak charges (general comments)	19	0	0	0	0	19
<b>Off-peak charges - general oppose</b>						
Oppose/disagree with the proposed off-peak charges/charging during off-peak (general comment)	45	0	0	0	1	46
<b>Off-peak charges - should be higher</b>						
Suggest proposed off-peak charges should be higher (general comment)	30	0	0	0	3	33
<b>Off-peak charges - should be lower</b>						
Suggest proposed off-peak charges are too expensive/should be lower (general comment)	30	0	0	0	1	31
Suggest proposed off-peak charges are too expensive/should be lower for motorcycles/mopeds/motor tricycles (general comm	21	0	0	0	0	21
Suggest proposed off-peak charges are too expensive/should be lower for cars (general comment)	12	0	0	0	0	12

Consultation Report (Silvertown & Blackwall tunnels user charge)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
<b>Peak charges - general support</b>						
Support/agree with the proposed standard peak charges (general comments)	18	0	0	0	1	19
<b>Peak charges - general oppose</b>						
Oppose/disagree with the proposed peak charges/charging during peak (general comment)	42	0	0	0	1	43
<b>Peak charges - should be higher</b>						
Suggest proposed peak charges should be higher (general comment)	18	0	0	0	2	20
<b>Peak charges - should be lower</b>						
Suggest proposed peak charges are too expensive/should be lower (general comment)	241	0	0	0	4	245
Suggest proposed peak charges are too expensive/should be lower for motorcycles/mopeds/motor tricycles (general comment)	10	0	0	0	0	10
Suggest proposed peak charges are too expensive/should be lower for cars (general comment)	57	0	0	0	1	58
Suggest proposed peak charges are too expensive/should be lower for small vans (general comment)	18	0	0	0	3	21
Suggest proposed peak charges are too expensive/should be lower for large vans (general comment)	8	0	0	0	2	10
Suggest proposed peak charges are too expensive/should be lower for heavy goods vehicles (HGVs) (general comment)	5	0	0	0	2	7
<b>Autopay</b>						
Concern that it is unfair/expensive to charge peak charges to those without Autopay/suggest should be the same charge level whether or not paid via Autopay	64	0	0	0	3	67
Suggest charges should be cheaper than proposed for those paying via Autopay	23	0	0	0	0	23
Other comment/suggestion about Autopay	32	0	0	0	3	35

Consultation Report (Silvertown & Blackwall tunnels user charge)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
<b>Penalty Charge Notice (PCN)</b>						
Support/agree with the proposed Penalty Charge Notice/amount (general comment)	4	0	0	0	0	4
Oppose/disagree with the proposed Penalty Charge Notice/amount (general comment)	51	0	0	0	0	51
Suggest a different amount for the Penalty Charge Notice	10	0	0	0	1	11
Concern about people not being aware of charges/Autopay/deadlines	4	0	0	0	1	5
Other comment/suggestion about the Penalty Charge Notice	13	0	0	0	2	15
<b>Impact - general</b>						
Concern proposals/charging will negatively impact those on lower incomes	394	0	0	0	9	403
Concern proposals/charging will negatively impact the economy/London	114	0	0	0	9	123
Concern proposals/charging will negatively impact businesses (general comment)	155	0	0	0	17	172
Concern proposals/charging will negatively impact small businesses/sole traders/tradesmen	162	0	0	0	16	178
Concern proposals/charging will negatively impact delivery companies/couriers	26	0	0	0	6	32
Concern proposals/charging will negatively impact charities/charity workers	9	0	0	0	3	12
Concern proposals/charging will negatively impact healthcare/care workers	25	0	0	0	3	28
Oppose/concern that the project unfairly target/penalise motorists	405	0	0	0	8	413
Concern proposals/charging will negatively impact commuters/those travelling to/from work	565	0	0	0	19	584
Concern proposals/charging will negatively impact shift workers	16	0	0	0	4	20
Concern proposals/charging will force people out of employment/cause them to change employment	87	0	0	0	6	93
Concern proposals/charging will force people to move away from the area/cause them to move away	71	0	0	0	1	72

Consultation Report (Silvertown & Blackwall tunnels user charge)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
Oppose/concern that proposals is unfair to those living in/travelling from East/South-East London/will not improve travel for them	855	0	31	0	18	904
Concern proposals/charging will have a negative impact on social/leisure activities/visiting friends and family	350	0	0	0	7	357
Concern proposals/charging will have a negative impact on health and wellbeing (physical and mental)	51	0	2	0	5	58
Concern proposals/charging will negatively impact those with disabilities/health issues	27	0	0	0	2	29
Concern costs will be passed on to residents/customers through goods/services	115	0	0	0	9	124
Concern proposals/charging will negatively impact those living outside of London	22	0	0	0	0	22
Support proposals/project as it will have a positive environmental impact/reduce pollution	5	0	0	0	1	6
Concern the proposals/project will not make a difference to environmental impact/levels of pollution	55	0	0	0	2	57
Concern the proposals/project will have a negative environmental impact/increase pollution	132	0	31	0	12	175
Concern the proposals/project will have other specified impacts (not captured by codeframe)	32	0	2	0	3	37
Concern proposals/charging will negatively impact those who are reliant on using cars/don't have viable alternatives	215	0	0	0	9	224
Concern about the impact on the elderly/older people	5	0	0	0	0	5
Concern about the impact on minority ethnic groups	8	0	1	0	1	10
Concern about impact on local residents/communities/restriction on their travel	14	0	0	0	4	18
<b>Impact - traffic</b>						
Support proposals/project as it will encourage car users to use other forms of transport/reduce car use	17	0	0	0	2	19



Consultation Report (Silvertown & Blackwall tunnels user charge)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
Concern proposals will not encourage car users to use other forms of transport/reduce car use/is incompatible with the Mayor's Transport Strategy	70	0	0	0	5	75
Concern proposals will encourage/increase car use	26	0	1	0	4	31
Support proposals as will reduce/improve levels of traffic/congestion/journey time in the surrounding area/generally	16	0	0	0	6	22
Concern the proposals will not reduce/improve levels of traffic/congestion/journey time in the surrounding area/generally	111	0	0	0	2	113
Oppose/concern the proposals will increase levels of traffic and congestion. Question whether this is compatible with the Mayor's Transport Strategy and that the consultation has lacked clarity on how this will be monitored	279	0	31	0	19	329
Concern the proposals will not reduce/improve levels of traffic/congestion/journey time for those using the tunnels	79	0	0	0	1	80
Concern the proposals will increase levels of traffic/congestion/journey time for those using the tunnels	65	0	0	0	1	66
Concern the proposals will increase use of other crossings/congestion at those (general comments)	99	0	0	0	7	106
Concern the proposals will increase use of Rotherhithe Tunnel/increase congestion there	288	0	0	0	10	298
Concern the proposals will increase use of Woolwich Ferry/increase congestion there	73	0	0	0	7	80
Concern the proposals will increase use of Tower Bridge/increase congestion there	111	0	0	0	5	116
<b>Discounts - general comments</b>						
Comparisons/references made to discounts/exemptions as part of Congestion Charge/ULEZ/other charging schemes	48	0	0	0	5	53

Consultation Report (Silvertown & Blackwall tunnels user charge)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
Comparisons/references made to discounts/exemptions of other tunnels/crossings	67	0	0	0	2	69
Other suggestion for who should receive a discount/exemption (unclear which referring to)	53	0	0	0	3	56
Support/agree with the proposed discounts (general comment)	217	0	0	0	5	222
Oppose/disagree with the proposed discounts (general comment)	177	0	0	0	2	179
Suggest discounts should be higher (general comment)	44	0	0	0	1	45
Discounts/eligibility is not clear/should be clearer (general comment)	45	0	0	0	3	48
Other suggestion for who should receive a discount	40	0	0	0	7	47
Suggest zero-emission/less-polluting vehicles should receive a discount	54	0	0	0	2	56
Suggest key workers should receive a discount (including NHS staff, care workers, emergency service staff)	34	0	0	0	0	34
Suggest charity workers/vehicles should receive a discount	6	0	0	0	7	13
Suggest TfL employees should receive a discount	5	0	0	0	0	5
Suggest students should receive a discount	3	0	0	0	0	3
Suggest pensioners/retired people should receive a discount	31	0	0	0	1	32
Suggest commuters/workers who regularly use the tunnels should receive a discount	29	0	0	0	1	30
Suggest PHV drivers should receive a discount	17	0	0	0	0	17
Suggest teachers/those working in education should receive a discount	7	0	0	0	1	8
Suggest disabled users should receive a discount (those without a Blue Badge)	3	0	0	0	1	4
Suggest tradesmen/contractors should receive a discount	3	0	0	0	0	3
<b>Discounts - low-income residents</b>						
Support/agree with proposed 50% discount for east London low-income residents (general comment)	25	120	0	0	6	151

Consultation Report (Silvertown & Blackwall tunnels user charge)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
Oppose/disagree with proposed 50% discount for east London low-income residents (general comment)	94	0	0	0	0	94
Suggest the discount should be higher for east London low-income residents/should be exempt	49	0	0	0	2	51
Queries about what a low-income resident is/eligibility criteria should be clearer	73	0	0	0	1	74
Other comment about eligibility/discounts for low-income residents	9	0	0	0	2	11
Queries about whether proposed low-income resident discount is required/feel they are unlikely to use affected vehicles	7	0	0	0	1	8
Suggest proposed 50% discount for east London low-income residents should be extended beyond three years/should be applied for a longer period	0	0	0	0	3	3
Suggest other criteria for who qualifies for the proposed low-income resident discount	15	0	0	0	2	17
<b>Discounts - residents</b>						
Discounts should apply to all London residents (general comment)	67	0	0	0	0	67
Suggest discounts should be for all residents local to tunnels/living in the surrounding area	527	0	0	0	6	533
Suggest all east London residents should receive a discount (regardless of income)	143	0	0	0	1	144
Concern proposals are unfair as only offers discounts to east London residents/suggest should consider south London residents too	169	0	0	0	1	170
Other comment about discounts for residents	26	0	0	0	1	27
<b>Discounts - £1 business discount on standard off-peak charges</b>						
Support/agree with proposed £1 business discount on standard off-peak charges (general comment)	14	0	0	0	3	17
Oppose/disagree with proposed £1 business discount on	40	0	0	0	1	41

Consultation Report (Silvertown & Blackwall tunnels user charge)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
standard off-peak charges (general comment)						
Other suggestion for business discount amount/other comment about business discount on standard off-peak charges	18	0	0	0	2	20
Suggest the proposed business discount should be higher	17	0	0	0	8	25
Suggest the proposed business discount is extended to those outside the host boroughs	5	0	0	0	4	9
Suggest proposed business discount should apply to peak as well as off-peak times	7	0	0	0	3	10
<b>100% discounts</b>						
Support/agree with proposed 100% discount for recovery and breakdown vehicles	4	0	0	0	1	5
Oppose/disagree with proposed 100% discount for recovery and breakdown vehicles/they should be charged	4	0	0	0	1	5
Support/agree with proposed 100% discount for vehicles with 9+ seats	10	0	0	0	4	14
Oppose/disagree with proposed 100% discount for vehicles with 9+ seats/they should be charged	25	0	0	0	0	25
Support/agree with proposed 100% discount for Blue Badge holders	37	0	0	0	9	46
Oppose/disagree with proposed 100% discount for Blue Badge holders/they should be charged	29	0	0	0	0	29
Suggest the discount for Blue Badge holders should be lower	3	0	0	0	0	3
Support/agree with proposed 100% discount for certain operational vehicles used by the host boroughs	3	0	0	0	0	3
Oppose/disagree with proposed 100% discount for certain operational vehicles used by the host boroughs/they should be charged	8	0	0	0	0	8
Support/agree with proposed 100% discount for Zero-Emission Capable private hire vehicles (PHVs)	12	0	0	0	4	16
Oppose/disagree with proposed 100% discount for Zero-Emission Capable private hire vehicles (PHVs)/they should be charged	19	0	0	0	0	19

Consultation Report (Silvertown & Blackwall tunnels user charge)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
Support/agree with proposed 100% discount for wheelchair accessible private hire vehicles	6	0	0	0	4	10
Oppose/disagree with proposed 100% discount for wheelchair accessible private hire vehicles/they should be charged	1	0	0	0	0	1
Queries about eligibility criteria for 100% discounts/should be clearer	22	0	0	0	1	23
Other comment about eligibility/proposed 100% discounts	19	0	0	0	3	22
<b>Exemptions - proposed</b>						
Support/agree with the proposed exemptions (general comment)	210	120	0	0	4	334
Oppose/disagree with the proposed exemptions (general comment)	132	0	0	0	3	135
Support/agree with taxis (black cabs) not being charged/being exempt	58	0	0	0	4	62
Oppose/disagree with taxis (black cabs) not being charged/being exempt	178	0	0	0	1	179
Support/agree with emergency services vehicles not being charged/being exempt	40	0	0	0	2	42
Support/agree with NHS vehicles that are exempt from vehicle tax not being charged/being exempt	32	0	0	0	0	32
Support/agree with vehicles in the disabled tax class not being charged/being exempt	33	120	0	0	2	155
Oppose/disagree with vehicles in the disabled tax class not being charged/being exempt	10	0	0	0	0	10
Support/agree with military vehicles not being charged/being exempt	16	0	0	0	1	17
Oppose/disagree with military vehicles not being charged/being exempt	16	0	0	0	0	16
<b>Exemptions - other suggestions</b>						
Suggest all London residents should be exempt/should not be charged	65	0	0	0	1	66
Suggest zero-emission/less-polluting vehicles should not be charged/should be exempt	100	0	0	0	6	126
Suggest private hire vehicles (PHVs) should not be charged/should be exempt	139	0	0	0	3	142

Consultation Report (Silvertown & Blackwall tunnels user charge)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
Suggest motorcycles/mopeds/motor tricycles should not be charged/should be exempt	298	0	0	0	4	302
Suggest residents local to tunnels/living in the surrounding area should not be charged/should be exempt	327	0	0	0	4	331
Other suggestion for exemption	43	0	0	0	8	51
Queries about eligibility criteria for exemptions/should be clearer	32	0	0	0	0	32
Other comment about eligibility/proposed exemptions	45	0	0	0	5	50
Taxis (black cabs) should only be exempt if they are electric/ZEC/have low emissions	15	0	0	0	0	15
Suggest key workers should not be charged/should be exempt (including NHS staff, care workers, emergency service staff)	43	0	0	0	2	45
Suggest charity workers/vehicles should not be charged/should be exempt	6	0	0	0	1	7
Suggest TfL employees should not be charged/should be exempt	7	0	0	0	1	8
Suggest students should not be charged/should be exempt	2	0	0	0	1	3
Suggest pensioners/retired people should not be charged/should be exempt	18	0	0	0	0	18
Suggest historic vehicles should not be charged/should be exempt	7	0	0	0	1	8
Suggest small/local businesses should not be charged/should be exempt	25	0	0	0	2	27
Suggest commuters/workers who regularly use the tunnels should not be charged/should be exempt	13	0	0	0	1	14
Suggest teachers/those working in education should not be charged/should be exempt	5	0	0	0	0	5
Suggest disabled users should not be charged/should be exempt (those without a Blue Badge)	4	0	0	0	0	4
Suggest businesses/commercial vehicles should not be charged/should be exempt	11	0	0	0	7	18
Suggest private cars should not be charged/should be exempt	10	0	0	0	0	10

Consultation Report (Silvertown & Blackwall tunnels user charge)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
Suggest delivery drivers/couriers should not be charged/should be exempt	5	0	0	0	0	5
Suggest those on lower incomes should be exempt	6	0	0	0	0	6
Suggest those who work in London should not be charged/should be exempt	8	0	0	0	0	8
<b>Reimbursements</b>						
Support/agree with proposed NHS patient reimbursement	8	0	0	0	4	12
Oppose/disagree with proposed NHS patient reimbursement	4	0	0	0	0	4
Other comment about proposed NHS patient reimbursement	10	0	0	0	2	12
Support/agree with proposed NHS staff reimbursement	23	0	0	0	5	28
Oppose/disagree with proposed NHS staff reimbursement	2	0	0	0	0	2
Other comment about proposed NHS staff reimbursement	7	0	0	0	2	9
<b>General comments about consultation</b>						
More information needed on proposals/proposals are not clear (general comment)	81	0	0	0	6	87
Concern consultation responses will have no/little impact on TfL decisions/just a tickbox exercise	388	0	1	0	5	394
Comment/reference to other/previous consultations	61	0	0	0	1	62
<b>Survey questions</b>						
Questions were complicated/unclear/should have been clearer	12	0	0	0	0	12
Questions asked were irrelevant	25	0	0	0	2	27
Consultation/questions are biased/leading	184	0	0	0	2	186
Should ask questions about charging more generally/whether people support or oppose any charge	103	0	0	0	0	103
Should be more questions about other specified aspects/topics	27	0	0	0	1	28
Response options to questions were limited	69	0	0	0	0	69
<b>Survey design</b>						
Survey was poor quality/design/presentation (general comment)	200	0	0	0	1	201
Suggest more and better use of maps/ images	6	0	0	45	0	51

Consultation Report (Silvertown & Blackwall tunnels user charge)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
<b>Survey accessibility</b>						
Promotion/advertising/awareness of consultation is poor/low/lacking and should be improved	232	0	0	0	2	234
Suggest further consultation/engagement needed	53	0	0	1	7	61
Consultation/survey was difficult to find/access (general comment)	99	0	0	0	1	100
Disagree with registering before being able to complete the survey/should be able to give views without registering/sharing personal information	98	0	0	0	0	98
Suggest registration/login process should be simplified	39	0	0	0	0	39
Criticism of TfL website (general comment)	107	0	0	0	0	107
Criticism of survey inclusivity (general comment)	30	0	0	0	0	30
<b>Other consultation comments</b>						
Other comments about consultation/consultation material	54	0	0	0	5	59
<b>Proposed green and fair package - supporting measures</b>						
Support/agree with proposed new zero-emission buses crossing the river at peak times	2	0	0	0	3	5
Support/agree with proposed free cross-river cycle shuttle-bus provision for at least 12 months	9	0	0	0	2	11
Suggest free cross-river cycle shuttle-bus provision should be made permanent	42	120	0	0	9	171
Support/agree with proposed bus concession to support local residents using new cross-river bus services for at least 12 months	0	0	0	0	1	1
Suggest bus concession to support local residents using new cross-river bus services should be made permanent	1	120	0	0	3	124
Support/agree with proposed free DLR journeys for at least 12 months between Cutty Sark - Island Gardens and Woolwich Arsenal - King George V	1	0	0	0	4	5
Suggest free DLR journeys between Cutty Sark - Island	2	0	0	0	3	5



Consultation Report (Silvertown & Blackwall tunnels user charge)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
Gardens and Woolwich Arsenal - King George V should be made permanent						
Other comment about proposed green and fair package and supporting measures	6	0	0	0	3	9
Queries about the green and fair package measures/information should be clearer	7	0	0	0	2	9
Suggest further improvements to cross-river cycle shuttle-bus	4	0	31	0	1	36
Suggest making cross-river cycle shuttle-bus accessible for modified cycles and cargo bikes	3	0	0	0	2	5
Concern the cross-river cycle shuttle-bus will be underused/feel it is not needed	9	0	0	0	1	10
Suggest improvements to DLR	4	0	0	0	3	7
Oppose proposed supporting measures as part of the green and fair package (general comment)	2	0	0	0	0	2
<b>Other suggested improvements</b>						
Suggest bus service/public transport provision needs improving/increasing links for those affected	433	0	1	0	18	452
Suggest improvements to public transport in terms of new vehicle type (e.g. tram-style/double-decker electric/new routemasters/zero-emission buses)	12	0	31	56	0	99
Suggest cycling provision needs improving	69	0	0	0	5	74
Other suggested improvement	31	0	1	0	4	36
Concern about the condition of the Rotherhithe Tunnel/suggest it needs improving	22	0	0	0	3	25
Suggest encouraging more use of active travel (walking/cycling)/buses using the tunnels/restricting car use and prioritising tunnels for active travel (walking/cycling)/buses	76	120	31	0	9	236
Suggest building more tunnels/bridges to improve the movement of people/traffic	18	0	0	0	2	20
Suggest more support for motorcyclists/should encourage more people to use motorcycles	10	0	0	0	2	12

Consultation Report (Silvertown & Blackwall tunnels user charge)

Code label	Public responses only	Friends of the Earth campaign only	We Are Possible campaign only	Routemaster campaign only	Stakeholder responses only	All responses
Suggest other restriction/s for who can use Silvertown/Blackwall Tunnel/s	11	0	0	0	1	12
Suggest reducing public transport fares/encouraging more people to use public transport	14	0	0	0	2	16
Suggest walking infrastructure needs improving	1	0	0	0	2	3
Suggest more restrictions on private car use	3	0	0	0	0	3
Suggest other ways to reduce traffic/congestion	11	0	2	0	2	15
Suggest other ways to reduce pollution/negative environmental impact	6	0	2	0	3	11
Suggest making improvements to other crossing points/facilities	6	0	0	0	1	7
Suggest focusing on addressing other issues/investing resources elsewhere instead of the charging proposal	2	0	0	0	0	2
Concern about the administrative costs involved in the proposed charges/how discounts and exemptions will be managed	7	0	0	0	0	7
Suggest other improvements to road infrastructure	5	0	0	0	2	7
Suggest there should be no charges for the Dartford Crossing	7	0	0	0	0	7
Suggest creating a strategy that considers all crossings/applying a fair and consistent approach across all crossings	1	0	31	0	2	34
<b>Other comments</b>						
Criticism/negative comment about the Mayor/Government/TfL	705	0	1	0	13	719
Unclear comment/unsure what referring to	61	0	0	0	0	61
Comment/comparison to other country/city	42	0	1	1	1	45
Out of scope comment/unrelated to proposals and not captured elsewhere	43	0	0	0	0	43
See previous response/comments	91	0	0	0	0	91
Other (does not fit into codeframe)	50	0	0	0	8	58
Suggest the Silvertown Tunnel is not needed/feel it should not have been built	23	0	1	0	3	27

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

<b>Code label</b>	<b>Public responses only</b>	<b>Friends of the Earth campaign only</b>	<b>We Are Possible campaign only</b>	<b>Routemaster campaign only</b>	<b>Stakeholder responses only</b>	<b>All responses</b>
Concern about the condition of the Blackwall Tunnel/suggest it needs improving	5	0	0	0	0	5
<b>Total respondents who provided a written comment</b>	<b>4877</b>	<b>120</b>	<b>31</b>	<b>56</b>	<b>97</b>	<b>5181</b>

**(ii) Our Response to Issues Raised**

We have summarised the issues raised by respondents to the consultation and have provided our response to these in the following table:

Ref	Issue raised	Draft response
1.	<b>General Charges</b>	
1.1.	<b>Charges/charging – general oppose</b>	
1.1.1.	Oppose/disagree with the proposed charges/charging generally (general comment)	<p>The primary purpose of the user charges is to manage traffic demand for the river crossings. By managing this traffic demand, we can support economic and population growth and minimise any adverse impacts on communities, health, safety and the environment, allowing the Scheme to achieve its <a href="#">Project Objectives (POs)</a>. A secondary reason for the user charges is to provide a means of helping to pay for the design, construction and operation of the new tunnel.</p> <p>To determine the opening year user charges, we assessed a range of user charging scenarios (including zero charge), following the policies and procedures as set out in the CPAP. This entailed using the <a href="#">User Charging Assessment Framework (UCAF)</a> to identify how each scenario would contribute to successfully delivering the <a href="#">POs</a> including effective traffic demand management (and the associated economic and environmental impacts of this demand) as well as ensuring that the initial user charges are 'not likely to give rise to materially new or materially different environmental effects to those reported in the Environmental Statement'. The UCAF assessment shows that the proposed charges are forecast to provide optimal performance against the <a href="#">POs delivering a large reduction in delay and congestion on tunnel approaches, while minimising the impact at nearby crossings</a>. A zero-charge scenario performed badly against the POs with significant delay and congestion remaining on tunnel approaches with worse traffic and environmental impacts when compared with the proposed charges.</p> <p>Operating the Silvertown Tunnel with no user charge performed badly against all project objectives when assessed through the UCAF. Building on the extensive user charge optioneering completed to support the DCO submission, the proposed charges have been developed to optimise performance across all project objectives.</p> <p>To deliver the benefits of the tunnel and help to cover the construction costs, user charges were first set out as part of a statutory consultation in 2015. The requirement to charge for the tunnels is set out in Part 5 of the <a href="#">Development Consent Order (DCO)</a> made by the Secretary of State for Transport in 2018 and the associated <a href="#">Charging and Policy and Procedure (CPAP)</a> document.</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
1.1.2	Oppose/disagree with charging to use the Blackwall Tunnel	<p>The purpose of introducing tunnel user charges for the Silvertown and Blackwall tunnels is to manage traffic demand effectively. This will allow us to support economic and population growth and the other minimise any adverse impacts on communities, health, safety and the environment, allowing the scheme to achieve its Project Objectives. The user charges will also provide a means of helping to pay for the design and construction of the Silvertown Tunnel, and on-going maintenance, management and operation of both tunnels, as well as investing in transport in south and east London.</p> <p>While the nearby Blackwall Tunnel is currently free to use, it suffers from chronic issues of congestion and regular traffic incidents, meaning the cross-river road network has poor resilience with no suitable alternative crossings in this part of London. This has a significant negative impact on travel, the economy and the environment across wide areas of east and southeast London. Regular tailbacks lead to miles of queuing traffic and poor air quality. The Silvertown Tunnel has been constructed nearby to solve these problems.</p> <p>If we introduce user charges on only the Silvertown (or Blackwall) tunnels and not the other, the benefits of the project will not be realised. Drivers will favour the non-charged tunnel, despite its constraints, and will not make best use of the new infrastructure. Given the tunnels' proximity on the south side, if the Blackwall Tunnel were not subject to a charge, queues would build up as they do today and inhibit access to the Silvertown Tunnel. As well as removing the benefit of reduced congestion and emissions from queueing traffic, other benefits such as the opportunity for enhanced cross-river bus provision would be eroded.</p> <p>Implementing user charges at both Silvertown and Blackwall tunnels was discussed during the public examination for the project in 2016 and the reasoning set out in the <a href="#">CPAP</a>. It explains why charging at both tunnels is fundamental for traffic demand management and for successfully delivering the <a href="#">POs</a>. Introducing user charges for both tunnels is directly related to achieving the <a href="#">POs</a> as set out in section 2.1 'Achieving the Project Objectives' in the <a href="#">CPAP</a>.</p>
1.1.3	Oppose proposals as it is just a revenue-raising project for TfL/waste of resources	<p>Managing traffic demand and the consequent environmental impacts is the main reason for the user charges. A secondary reason for the user charges is to provide a means of helping to pay for the design and construction of the Silvertown Tunnel and the on-going maintenance, management and operation of both tunnels.</p> <p>Managing demand effectively via user charges means the additional capacity brought about by the new tunnel does not generate induced traffic, and there remains a tangible benefit from it in the long term.</p> <p>Revenue from user charges is the primary source of funding for the scheme. We expect the revenue from user charges at both the Silvertown and Blackwall tunnels will, over time, cover the cost of the new tunnel. Without this revenue</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>stream, the project would not have been viable and the persistent issues at the Blackwall Tunnel would remain.</p> <p>An assessment of a zero-charge scenario (as well as other user charging scenarios) was also undertaken prior to submitting the <a href="#">DCO</a>. However, this scenario would not have delivered the <a href="#">POs</a> and was therefore dismissed at this time.</p>
1.1.4	Oppose/disagree with charge because of the cost-of-living crisis/concern it will add to cost of living	<p>We have considered the cost-of-living crisis and we will offer a green and fair package of concessions and discounts to certain people or in respect of certain vehicle types and journeys where we consider it is fair and justified to do so.</p> <p>For people who drive through the tunnels, these include discounts for eligible low-income residents in 13 east and southeast London boroughs<sup>4</sup> and time limited discounts for certain small businesses, sole traders and charities in the host boroughs. Discounts will be kept under review. Local residents who use buses to cross the river will also benefit from improved bus services and better journey times.</p> <p>Although not a part of our consultation proposals, a time-limited bus and DLR concession will be offered. Where bus route journeys cross the river through the Silvertown and Blackwall tunnels, these will be offered free of charge for at least one year from the opening of the Silvertown Tunnel. For cross-river DLR journeys (specifically between Island Gardens and Cutty Sark, and King George V and Woolwich Arsenal stations) we will also offer a free of charge service for at least one year from tunnel opening.</p> <p>For more information on discounts, see <a href="#">Section 6</a> of this report; and for exemptions and reimbursements see <a href="#">Section 7</a>.</p>
1.2.	<b>Charges - should be higher generally</b>	
1.2.1	Suggest proposed charges should be higher (general comment)	<p>In developing the proposed user charges and the discounts and exemptions, we have considered the achievement of the <a href="#">POs</a>, the policies and procedures set out in <a href="#">CPAP</a>, the equalities impacts and other relevant considerations. We tested a range of potential user charges to arrive at the user charges proposed in the consultation. Updating the <a href="#">UCAF</a> was a part of this process and was part of the consultation materials.</p> <p>In developing the proposed user charges (including charge levels for different vehicles, charging hours, discounts and exemptions, and other factors), we have considered a range of factors, including the potential impact on the road network, the environment and the impact on different groups through an Equalities Impact Assessment. We considered a range of</p>

<sup>4</sup> The 13 east and southeast London boroughs are Barking & Dagenham, Bexley, Bromley, City of London Corporation, Greenwich, Hackney, Havering, Lewisham, Newham, Redbridge, Southwark, Tower Hamlets or Waltham Forest. To qualify as low-income status, a resident must be in receipt of an eligible benefit which includes Income Support, Income-related Employment & Support Allowance, Income-based Jobseekers Allowance, Universal Credit, Pension Credit, Child Tax Credit, Working Tax Credit, Carer's Allowance and Housing Benefit.

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>user charge levels to determine which would most effectively contribute to achieving the <a href="#">POs</a>.</p> <p>The charge levels in the Assessed Case (which formed part of the <a href="#">DCO</a> application in 2016) were based on 2015 prices. Since 2015 inflation has increased due to a variety of economic factors. We used the Department for Transport's (DfT) Gross Domestic Product (GDP) deflator tool to calculate how prices have changed between 2015 and 2025 as a result of inflation. This tool shows that the prices in the assessed case charges need to be adjusted by 33.5 per cent to account for inflation, and this has been reflected in the proposals.</p> <p>Our Refreshed Assessment also showed that if charges were higher, traffic would be incentivised to use adjacent crossings. This would undermine the achievement of the project's objectives such as <a href="#">PO5</a> (minimising the adverse impacts of the project) and <a href="#">PO6</a> (acceptability to stakeholders).</p>
1.2.2	Suggest proposed charges should be higher for motorcycles / mopeds / motor tricycles (general comment)	<p>Motorcycles like all other vehicles will benefit from the new tunnel through journey time savings, more reliable journeys and increased network resilience and as such should contribute.</p> <p>The charges for motorcycles (P2Ws and P3Ws) have been set at a level which reflects these impacts and enables us to effectively manage demand for the tunnel so that all users benefit from the additional capacity it provides. Higher user charges for this group could lead to diversions to other crossings, and thereby have negative impacts on the local road network.</p> <p>We have set the user charges to a level where we can still meet the <a href="#">POs</a> as set out in the <a href="#">UCAF</a>.</p>
1.2.3	Suggest proposed charges should be higher for cars (an example comment: the charge level for a car should always be higher than a bus fare)	<p>A key objective of the user charges is to manage demand and ensure the benefits of the project are achieved as well as manage any impacts on local communities and the environment (<a href="#">PO5</a>).</p> <p>The user charges also help to fulfil <a href="#">PO2</a>, improving road network performance and <a href="#">PO7</a>, managing congestion, and <a href="#">PO3</a>, supporting economic and population growth by providing improved cross-river links.</p> <p>In order to help achieve these objectives, it is important that all vehicles which could use the tunnels and contribute to wear and tear, congestion and environmental impacts are in scope for charging. It is recognised that the magnitude of this impact varies by vehicle and the proposed charge levels have been scaled in part to reflect this.</p> <p>The charge for cars (which make up the highest proportion of cross river trips at the Silvertown and Blackwall tunnels) has been set at a level which reflects these impacts and enables us to effectively manage demand for the tunnel so that all users benefit from the additional capacity it provides.</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>It is important to set the charges at a level which enables users to benefit from the increased capacity while ensuring the POs are met, in particular in managing the negative impacts of traffic on the surrounding area. A higher user charge for this group could lead to diversions to other crossings, and thereby have negative impacts on the local road network.</p> <p>For at least the first year, bus travel on any of the new routes for local residents, cross-river DLR travel and the cross-river cycle shuttle-bus, will be free. The user charge level is a balance of many factors; if it is too high there is a risk of increasing traffic using other neighbouring crossings such as Rotherhithe Tunnel, but if it's too low there is a risk of not meeting the Project Objective of managing traffic demand. The amount paid for any journey depends on the user, vehicle type, concessions available and other factors.</p> <p>The headline off-peak user charge cost for a car (£1.50) is slightly less than an adult pay as you go bus fare (£1.75). Setting the level of the user charges is supported by extensive traffic modelling and environmental assessment work. However, there are several other factors that make travelling by bus overall a cheaper option than travelling by car.</p> <p>Several other costs that need to be accounted for when owning a car such as fuel, maintenance and parking etc. And when added together, the overall cost to make a cross-river journey by car will be more than the £1.50 headline user charge cost.</p> <p>While an adult pay as you go bus fare is £1.75, not everyone will pay this full cost. There are discounts for many that travel by bus such as people on a low-income, apprentices and students and young carers etc. Furthermore, when more than one bus journey is made, this will frequently attract a discount, e.g. through the hopper fare, through daily or weekly price caps, or when travelling on a monthly or annual bus and tram pass. It's also important to note that bus travel through both the Blackwall and Silvertown Tunnels will be free for at least one year from when the tunnel opens, encouraging people to use the new frequent bus services that will be operating through the tunnel from day one.</p>
1.2.4	Suggest proposed charges should be higher for small vans (general comment)	<p>A key objective of the user charges is to manage demand and ensure the benefits of the project are achieved as well as manage any impacts on local communities and the environment (PO5).</p> <p>The user charges also help to fulfil PO2, improving road network performance and PO7, managing congestion, and PO3, supporting economic and population growth by providing improved cross-river links.</p> <p>In order to fully realise these objectives, it is important that all vehicles which could use the tunnels and contribute to wear and tear, congestion and environmental impacts are in scope for charging. It is recognised that the magnitude of this</p>



Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>impact varies by vehicle and the proposed charge levels have been scaled in part to reflect this.</p> <p>The charge for small vans has been set at a level which reflects these impacts and enables us to effectively manage demand for the tunnel so that all users benefit from the additional capacity it provides. Further to the consultation, we noted small electric vans (because of their heavier weight) were at risk of being charged at the higher rate. We have recommended an amendment to how these vehicles are categorised to ensure this is not the case.</p>
1.2.5	Suggest proposed charges should be higher for large vans (general comment)	<p>A key objective of the user charges is to manage demand and ensure the benefits are achieved as well as manage any impacts on local communities and the environment (PO5).</p> <p>The user charges also help to fulfil PO2 (improving road network performance), PO3 (supporting economic and population growth by providing improved cross-river links) and PO7 (managing congestion and helping to pay for the Silvertown Tunnel and the maintenance of both tunnels).</p> <p>In order to help achieve these objectives, it is important that all vehicles which could use the tunnels and contribute to wear and tear, congestion and environmental impacts are in scope for charging. It is recognised that the magnitude of this impact varies by vehicle and the proposed charge levels have been scaled in part to reflect this. The charge for Heavy Goods Vehicles (HGVs) has been set at a level which reflects these impacts and enables us to effectively manage demand for the tunnel so that all users benefit from the additional capacity it provides.</p> <p>Today, HGVs have the option of crossing the river at the Dartford Crossing and paying a charge or driving through London and crossing the river at Blackwall tunnel for free (subject to above height restrictions). This 'free route' incentive will be completely removed by the user charging (with higher charges for HGVs) and, as a result, it is expected only HGVs that need to travel within London will typically use the route.</p> <p>While the new tunnels are designed to modern standards and so will be able to accommodate those HGVs which are currently too tall for the Blackwall Tunnel (over four metres going northbound and 4.7 metres going southbound), we do not expect any notable increase in HGV traffic as a result of the tunnel because of the user charges.</p> <p>Traffic is particularly low at night and the Silvertown Tunnel will be part of the excluded route network of the London Lorry Control Scheme, providing an opportunity for HGV trips to re-time to outside the busiest periods.</p> <p>The Dartford Crossing is also free between 22:00 – 06:00 so there would be no incentive for drivers to divert away from the M25.</p>
1.2.6	Suggest proposed charges should be higher for heavy goods vehicles (HGVs)	<p>A key objective of the user charges is to manage demand and ensure the benefits are achieved as well as manage any impacts on local communities and the environment (PO5).</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
	(general comment – for example HGVs should be tolled 24 hours a day)	<p>The user charges also help to fulfil PO2 (improving road network performance), PO3 (supporting economic and population growth by providing improved cross-river links) and PO7 (managing congestion and helping to pay for the Silvertown Tunnel and the maintenance of both tunnels).</p> <p>In order to help achieve these objectives, it is important that all vehicles which could use the tunnels and contribute to wear and tear, congestion and environmental impacts are in scope for charging. It is recognised that the magnitude of this impact varies by vehicle and the proposed charge levels have been scaled in part to reflect this. The charge for Heavy Goods Vehicles (HGVs) has been set at a level which reflects these impacts and enables us to effectively manage demand for the tunnel so that all users benefit from the additional capacity it provides.</p> <p>Today, HGVs have the option of crossing the river at the Dartford Crossing and paying a charge or driving through London and crossing the river at Blackwall tunnel for free (subject to above height restrictions). This ‘free route’ incentive will be completely removed by the user charging (with higher charges for HGVs) and, as a result, it is expected only HGVs that need to travel within London will typically use the route.</p> <p>While the new tunnels are designed to modern standards and so will be able to accommodate those HGVs which are currently too tall for the Blackwall Tunnel (over four metres going northbound and 4.7 metres going southbound), we do not expect any notable increase in HGV traffic as a result of the tunnel because of the user charges.</p> <p>Traffic is particularly low at night and the Silvertown Tunnel will be part of the excluded route network of the London Lorry Control Scheme, providing an opportunity for HGV trips to re-time to outside the busiest periods.</p> <p>The Dartford Crossing is also free between 22:00 – 06:00 so there would be no incentive for drivers to divert away from the M25.</p>
<p><b>1.3. Charges - should be lower generally</b></p>		
1.3.1	Suggest proposed charges are too expensive/should be lower (general comment)	<p>In developing the proposed user charges and the discounts and exemptions, we have considered the policies and procedures set out in <a href="#">CPAP</a>, the achievement of the <a href="#">POs</a>, the equalities impacts and other relevant considerations such as our traffic management duties. We used the Assessed Case as a starting point for the Refreshed Assessment, then tested a range of potential user charges. The proposed user charges put forward as part of this consultation provide optimal performance against these criteria, and represent the best balance of all considerations taken into account.</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>If the charges are set too high, overall demand for adjacent crossings would increase significantly and the project objective would not be met. If we were to set the user charge too low, it would attract additional traffic to the crossings and would erode the benefits of the project.</p> <p>The charge levels in the Assessed Case (which formed part of the <a href="#">DCO</a> application in 2016) were based on 2015 prices. We used the Department for Transport's (DfT) Gross Domestic Product (GDP) deflator tool to calculate how prices have changed between 2015 and 2025 as a result of inflation. When calculating the user charges proposals, this tool shows that the prices in the Assessed Case need to be adjusted by 33.5 per cent to account for inflation when compared to 2015 prices which.</p> <p>The proposals offer opportunities to pay lower user charges, for example by registering for <a href="#">Auto Pay</a>, which means that customers can benefit from off-peak charges at certain times and offers the additional benefit of removing the risk of incurring a penalty charge notice (PCN). No user charges will apply between 22:00 – 06:00. Some residents of the 13 east London boroughs would qualify for the 50 per cent discount for a period of at least three years and eligible small businesses, sole traders and charities based in the host boroughs would also be able to register for a £1 discount on standard off-peak charges for at least twelve months. In addition, we have proposed a 100 per cent discount for Blue Badge holders, exemptions for vehicles in the disabled tax class and reimbursements for certain NHS patient and staff trips if certain criteria are met.</p>
1.3.2	Suggest proposed charges are too expensive/should be lower for motorcycles / mopeds / motor tricycles (general comment)	<p>A key objective of the user charges is to manage demand and ensure the benefits of the project are achieved as well as manage any impacts on local communities and the environment (PO5). The user charges also help to fulfil PO2, improving road network performance and PO7, managing congestion, and PO3, supporting economic and population growth by providing improved cross-river links.</p> <p>In order to help achieve these objectives, it is important that all vehicles which could use the tunnels and contribute to wear and tear, congestion and environmental impacts are in scope for charging. It is recognised that the magnitude of this impact varies by vehicle and the proposed charge levels have been scaled in part to reflect this.</p> <p><u>Motorcycles</u> Motorcycles like all other vehicles will benefit from the Project though journey time savings, more reliable journeys and increased network resilience, and they contribute to traffic and emissions.</p> <p>As their impact is deemed to be less than other road users their charges are the lowest possible. In the off-peak, they pay the same as cars.</p> <p>We have sought to minimise user charges to a level where we can still meet the <a href="#">POs</a> as set out in the UCAF and in the</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>off-peak £1.50 is the lowest possible charge for any vehicle type without the risk of eroding the <a href="#">POs</a>.</p> <p><u>Cars</u> The charge for cars (which make up the highest proportion of cross river trips at the Silvertown and Blackwall tunnels) has been set at a level which reflects their impacts and enables us to effectively manage demand for the tunnel so that all users benefit from the additional capacity it provides.</p> <p><u>Small/large vans</u> To allow eligible businesses to make the transition to paying a user charge for crossing the river, there will be a £1 discount on standard off-peak charges for small businesses, sole traders and charities based in the host boroughs.</p> <p><u>Freight</u> The freight sector will benefit from the new modern tunnel that can accommodate the largest freight vehicles. Fewer incidents, closures and delays at the Blackwall Tunnel and more reliable journey planning as well as access to the shared bus / HGV lane will also benefit the sector significantly.</p> <p>The charge for HGVs has been set at a level which reflects these impacts and enables us to effectively manage demand for the tunnel so that all users benefit from the additional capacity it provides.</p> <p>While the new tunnels are designed to modern standards and so will be able to accommodate HGVs which are currently too tall for the Blackwall Tunnel, we do not expect any notable increase in HGV traffic as a result of the project.</p> <p>Today, HGVs have the option of crossing the River Thames at Dartford and paying a charge or driving through London and crossing the Thames at Blackwall for free (subject to above height restrictions). This 'free route' incentive will be completely removed by the user charging (with higher charges for HGVs) and, as a result, it is expected only HGVs that need to travel within London will typically use the route.</p>
1.3.3	Suggest proposed charges are too expensive/should be lower for motorcycles / mopeds / motor tricycles (general comment)	As above – combined response.
1.3.4	Suggest proposed charges are too expensive/should be lower for cars (general comment)	As above – combined response.
1.3.5	Suggest proposed charges are too expensive/should be lower for small vans (general comment)	As above – combined response.
1.3.6	Suggest proposed charges are too expensive/should be lower for large vans (general comment)	As above – combined response.

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
1.3.7	Suggest proposed charges are too expensive/should be lower for heavy goods vehicles (HGVs) (general comment)	As above – combined response.
<b>1.4. Charging period</b>		
1.4.1	Oppose/disagree with proposed charging periods/timings (general comment)	<p>The primary purpose of the user charges is to manage traffic demand for the river crossings. We assessed a range of user charging scenarios (including zero charge), following the policies and procedures as set out in the <a href="#">CPAP</a>. This entailed using the <a href="#">User Charging Assessment Framework (UCAF)</a> to identify how each scenario would contribute to successfully delivering the <a href="#">POs</a>.</p> <p>By having a higher charge in times of greatest demand, the deterrent effect is greater, conversely, when demand is lower, lower user charges are appropriate, and so a lower off-peak charge will be available to customers registered for Auto Pay. Additionally, at the time of least demand (between 22:00 – 06:00) no user charges will apply-</p> <p>Demand remains high enough to warrant user charges at weekends and public holidays.</p> <p>Managing demand also allows the other effects of the project to be managed and the <a href="#">POs</a> met. However, in recognition that there are no public transport alternatives on Christmas Day, no charges would apply on 25 December.</p> <p>Please also see our response below for additional information.</p>
1.4.2	Oppose/disagree with having separate peak and off-peak charges/should be the same charges for all	<p>The inclusion of peak and off-peak charges based on the day, time of day and on directional flow reflects the patterns of demand for the tunnels, and the need to deploy user charges which can effectively manage this and the other effects of the project such that the <a href="#">POs</a> can be achieved.</p> <p>Peak charges are only applicable where demand is at its highest which is on weekdays only, in the northbound direction in the morning peak and southbound direction in the evening peak. This helps to meet the <a href="#">POs</a> (PO2, improving network performance, PO5, manage any impacts on local communities and PO7, managing congestion). By having a higher charge in times of greatest demand, the deterrent effect is greater, and we are better able to meet the <a href="#">POs</a>.</p> <p>Conversely, when demand is lower, lower user charges are appropriate, and so a lower off-peak charge will be available to customers registered for Auto Pay. Additionally, at the time of least demand (between 22:00 – 06:00) no user charges will apply. The user charges, including time of day charges apply, will be kept under review and we will make variations where this is considered necessary for the continued achievement of the <a href="#">POs</a>, with the first review planned for 12-months after the tunnel opens. Peak charges will apply at all times to non-account holders (customers who do not register for Auto Pay).</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
1.4.3	Oppose/disagree with proposed peak charging periods/timings (general comment)	As above – combined response.
1.4.4	Suggest peak charges should apply at peak times regardless of direction travelling in	As above – combined response.
1.4.5	Suggest no charges at weekends	While demand is lower in the off-peak - including weekends - demand still exists and it is necessary to manage it to control the impacts of traffic and to achieve the <a href="#">POs</a> .
<b>1.5. Charges - other comments</b>		
1.5.1	Suggest other transport modes should be charged	<p>After careful consideration, we decided that walking and cycling would not be permitted through the Silvertown Tunnel for safety reasons. However, for cyclists, we will provide a new cycle shuttle-bus service, creating a safe way for cyclists to cross the river using the Silvertown Tunnel. This will be a high frequency service, where cyclists will be able to turn up and go without consulting a timetable in advance and will be free for at least the first 12 months. Following opening, in the first year of operation, we will track uptake of the services, assess suitability of the timetable and make changes if necessary. As part of the review, we will also assess affordability of making the buses free, discounted or fully charged beyond the opening year.</p> <p>In addition to these concessions, we will also provide 21 zero-emission buses per hour crossing the river at peak times for pedestrians to safely use the tunnel. These will be free for at least 12 months as part of the green and fair package of concessions and discounts.</p>
1.5.2	Suggest should only charge to use tunnels for a set period of time/until they have been paid for	<p>The user charges are anticipated to be a long-term measure required to manage traffic demand at the tunnels for the foreseeable future. Without a user charge, the benefits of additional capacity put in place by the new tunnel would be short-lived, as the enhanced attractiveness of the route via the tunnels could attract additional traffic to the point where queues, initially relieved, would return to their former levels. After 12 months' operation of the new tunnel, we will undertake a review of the user charges to check they are performing broadly in accordance with the <a href="#">POs</a>.</p> <p>Charges collected will be used to support both the servicing and repayment of construction finance and ongoing operation and maintenance costs of Silvertown and Blackwall tunnels. Any net revenue will be reinvested back into running and improving London's public transport network.</p>
1.5.3	Need more information/clarity on charge amounts/timings	A comprehensive public information campaign will be launched ahead of the Silvertown Tunnel opening and the commencement of charging for using the Silvertown and Blackwall tunnels. A multi-channel campaign will raise awareness and inform local residents, businesses and drivers and other potential tunnel users about how the tunnels will operate, hours of operation, user charges and how to pay them, including information on how to register for Auto Pay, as well as for discounts and exemptions if

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>required. The public information campaign will also promote the public transport offer in the green and fair package of concessions and discounts.</p> <p>Our vehicle checker will be available on the TfL website to check the charges for your vehicle type.</p>
1.5.4	Need more information/clarity on what vehicles will be affected by charges	<p>We will encourage customers to sign up to Auto Pay which is free to register. The correct charge which is applicable to a vehicle will be automatically calculated for customers who are registered for Auto Pay so they can be assured that the correct charge for their vehicle type (and for the time of their trip) has been applied. By registering for Auto Pay, customers can also benefit from lower off-peak charges at certain times and offers the additional benefit of removing the risk of incurring a PCN.</p> <p>Please also see our response to item 1.5.2 above.</p>
1.5.5	Need more information about why charges are needed/need more justification	<p>In <a href="#">Section 1.1. 'Charges/charging – general oppose'</a> we set out why user charges are necessary. The rationale for user charges is further set out in the <a href="#">consultation materials</a> and other documentation which supported approval of the <a href="#">Silvertown Tunnel Order 2018 (DCO)</a>. The DCO authorises us to construct, operate and maintain the Silvertown Tunnel also requires us to levy charges in respect of motor vehicles using either the Silvertown or Blackwall tunnels.</p> <p>The primary purpose of the user charges is to manage traffic demand for the river crossings. By managing this traffic demand, we can support economic and population growth and minimise any adverse impacts on communities, health, safety and the environment, allowing the Scheme to achieve its <a href="#">Project Objectives (POs)</a>. A secondary reason for the user charges is to provide a means of helping to pay for the design, construction and operation of the new tunnel.</p>
1.5.6	Suggest charges should be the same as Dartford Crossing	<p>The Dartford Crossing is a potential alternative crossing for some journeys and is therefore considered in our UCAF. However, it would not be appropriate to set Silvertown and Blackwall Tunnel charges relative to this factor alone. The approach to user charging at the Silvertown and Blackwall tunnels has been guided by the extent to which they are necessary or expedient to achieve the <a href="#">POs</a> (Policy 1 of the <a href="#">CPAP</a>), the other policies and procedures set out in <a href="#">CPAP</a>, the equalities impacts and other relevant considerations such as our - modelling of impacts on traffic levels on the local network.</p> <p>The Dartford Crossing is managed by National Highways. We have no role in setting or collecting charges from this crossing.</p> <p>In addition, there is a specific requirement in Policy 10 that the initial user charges are 'not likely to give rise to materially new or materially different environmental effects to those reported in the Environmental Statement (ES)'.</p> <p>Revenue from user charges is the primary source of funding for the scheme. Without this revenue stream, the project would not have been viable and the persistent issues at the Blackwall Tunnel would remain.</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		We have however been in regular discussion with National Highways, who is also a member of our statutory consultative group, <a href="#">STIG</a> , to share information about the traffic impacts on the wider area associated with opening of the Silvertown Tunnel and introduction of the user charge at the crossings.
1.5.7	Other reference/comparison to charges for Dartford Crossing	As above – combined response.
1.5.8	Other reference/comparison to charges of Congestion Charge/ULEZ/other charges	<p>The objectives of the Silvertown Tunnel project, and the legislative context in which it will operate, differ from those of the Congestion Charge and the ULEZ. The seven <a href="#">POs</a> for the Silvertown Tunnel are set out in the <a href="#">CPAP</a> and the power to build the project and apply user charges is conferred by means of a <a href="#">DCO</a>.</p> <p>By contrast, the primary objective of the ULEZ is to reduce emissions and improve air quality and the primary objective of the Congestion Charge is to manage traffic and congestion in central London. Both of these projects are implemented under the Mayor's powers under Schedule 23 of the GLA Act.</p> <p>These projects are to be kept under review to ensure they prove effective in furthering or delivering their project objectives.</p>
1.5.9	Other suggestion for how charges should be calculated/applied	In developing the user charges, discounts and exemptions which have been consulted on, we have followed specific requirements, in the <a href="#">CPAP</a> as described in the <a href="#">Supplementary Information</a> . The <a href="#">CPAP</a> also sets out how future variations to the user charges will be made.
1.5.10	Other suggestion for charging period/timings	<p>Setting the level of the user charges is supported by extensive traffic modelling and environmental assessment work. In setting the proposed user charges (including charge levels for different vehicles, charging hours, discounts and exemptions, and other factors), we have considered a range of factors, including the potential impact on the road network, the environment and the impact on different groups through an EqlA. We considered a range of user charge levels to determine which would most effectively contribute to achieving the <a href="#">POs</a>.</p> <p>The inclusion of peak and off-peak charges based on the day, time of day and on directional flow reflects the patterns of demand for the tunnels. To effectively manage the demand for the tunnels, user charges are required. Demand is at its highest northbound in the morning peak of weekdays and southbound in the evening peak and so it is necessary to impose a higher charge at this time compared to in the off-peak and at weekends in order to effectively manage demand at the crossings and meet the <a href="#">POs</a>.</p>
1.5.11	Suggest charges should be higher for petrol/diesel/worst-polluting vehicles/should be lower for less-polluting vehicles	<p>A discount for low emission vehicles was assumed in the <a href="#">DCO</a> proposals we previously consulted on. When the <a href="#">DCO</a> was being drafted in 2014, the number of electric vehicles in London was relatively low. Since then, there has been significant growth in these vehicles as a proportion and absolute number across London.</p> <p>If a higher number of these vehicles are discounted, the</p>



Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>project benefits would be lower and could be eroded over time and achievement of the <a href="#">POs</a> would be compromised. Moreover, Policy 10 of the <a href="#">CPAP</a> requires us to ensure that the initial user charges are 'not likely to give rise to materially new or materially different environmental effects to those reported in the Environmental Statement'.</p> <p>Improving air quality for Londoners by encouraging a switch to cleaner vehicles remains a key priority for TfL and the Mayor. We expanded the ULEZ across all London boroughs in August 2023, alongside a series of measures to support Londoners including a £210m scrappage fund which included an additional recent option to donate vehicles to Ukraine.</p> <p>The London-wide ULEZ Six Month Report (July 2024) shows the vehicle compliance rate is now 96 per cent, and within the outer London ULEZ area, NOx emissions from cars and vans are estimated to be 13 per cent and seven per cent lower than a scenario without the expansion. This is equivalent to removing 200,000 cars from the road for one year. PM2.5 exhaust emissions from cars in outer London are estimated to be 22 per cent lower than without the expansion (six per cent more than expected). Overall, NO2 concentrations in outer London are estimated to be 21 per cent lower than without the ULEZ and its expansions.</p>
1.5.12	Suggest charges should apply to all River Thames crossings/shouldn't only charge for east London crossings	<p>There is no proposal to apply user charges at other crossings of the River Thames.</p> <p>Charging at the Silvertown and Blackwall tunnels is proposed to manage demand, achieve the <a href="#">POs</a> and pay for the construction of the new tunnel and the operation and maintenance of both tunnels. Motorists who will benefit from the congestion reduction and journey time improvements will be charged to use the tunnels (unless they qualify for a 100% discount or exemption).</p> <p>While the nearby Blackwall Tunnel is currently free to use, it suffers from chronic issues of congestion and regular traffic incidents, meaning the cross-river road network has poor resilience with no suitable alternative crossings in this part of London. This has a significant negative impact on travel, the economy and the environment across wide areas of east and southeast London. Regular tailbacks lead to miles of queuing traffic and poor air quality.</p> <p>Given the Silvertown and Blackwall tunnels' proximity on the south side, if the Blackwall Tunnel were not subject to a charge, queues would build up as they do today and inhibit access to the Silvertown Tunnel. As well as removing the benefit of reduced congestion, other benefits such as the opportunity for enhanced cross-river bus provision would be eroded.</p> <p>User charges already apply to other river crossings. There are five river crossings in London that are within the Congestion Charging Zone (Southwark Bridge, Blackfriars Bridge, Waterloo Bridge, Westminster Bridge and Lambeth Bridge), and all river crossings are within ULEZ.</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>TfL is not responsible and does not hold relevant powers in respect of other crossings outside of London. For example, National Highways is responsible for the Dartford Bridge and the Dart charge. As with TfL's other road user charging schemes, discounts and exemptions have been developed to take into account the impacts of the charge, the composition of traffic and the purpose that the user charge serves.</p> <p>We have put in place a number of measures to support east and southeast Londoners including the low-income residents' discount, free cross river buses, free DLR crossings (refunded) between stations either side of the river and a free cross-river cycle shuttle-bus (the latter three all for at least 12 months). As part of the green and fair package of concessions and discounts, we are also proposing a £1 discount on the standard off-peak charge for small businesses, sole traders and charities registered in the host boroughs for at least one year.</p>
1.5.13	Suggest introducing annual ticket for crossings (i.e. pay a fee to use the tunnels as much as wanted within year/other set period)	<p>The objectives of the Silvertown Tunnel project include improving the resilience of the river crossings, improving road network performance of the Blackwall Tunnel, supporting economic growth, and managing congestion. The user charge helps to achieve these objectives by managing traffic demand and the consequent environmental effects.</p> <p>Introducing a season ticket, which would mean the overall cost of crossings was less than paying for separate journeys could encourage additional journeys to be made by car, undermining the project objectives. The user charges encourage drivers to consider whether to travel by vehicle or to use public transport, and if they choose to travel by vehicle, whether they can re-time their journey to the off-peak period and pay a lower charge (if registered for Auto Pay).</p>
1.5.14	Suggest allowing a number of free/exempt journeys through tunnels within a set period before charging	<p>Managing traffic demand and the consequent environmental impacts are the main reasons for the user charge. A secondary reason for the user charge is to provide a means of helping to pay for the design and construction of the Silvertown Tunnel and the on-going maintenance and operation of the Silvertown and Blackwall tunnels. Policy 2 of the CPAP provides that TfL must ensure that the user charges are fair, justified and do not undermine the <a href="#">POs</a>. A user charge which only applies after a certain number of trips is likely to induce traffic and would undermine our ability to effectively achieve the <a href="#">POs</a>. The impact from single time or rare users of the tunnels would not be addressed even though they would be contributing to congestion, noise and emissions.</p>
1.5.15	Suggest charges should be limited to once per day/capped at a daily limit	<p>Managing traffic demand and the consequent environmental impacts are the main reasons for the user charge. If charges were capped or limited to once per day, there would be no incentive for users to consider the costs of their journey and re-time for the off-peak or switch to public transport once they had made one trip that day. As a consequence of this additional demand, we would not meet the <a href="#">POs</a> and congestion would continue.</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		Limiting charges to once per day or capped would not reflect the impacts of the journey in terms of congestion, noise, emissions and wear and tear.
1.5.16	Suggest charges should be applied to other east London crossings (e.g. Rotherhithe, Tower Bridge)	There are no proposals to charge at other river crossings and the Rotherhithe Tunnel, Woolwich Ferry and Tower Bridge will remain free to use.  See also our response to issue 1.5.12 above.
1.5.17	Concern about rising charges for tunnels/suggest keeping at fixed rate for a period of time	This consultation concerned the initial user charges, discounts and exemptions for the Blackwall Tunnel and Silvertown Tunnel, to apply once the latter opens in spring 2025. As set out in the <a href="#">CPAP</a> (Policy 11), TfL must keep the user charges under review and will make variations where this is considered necessary for the continued achievement of the <a href="#">POs</a> . In addition, as described in Procedure 5, there will be a 12-month review of the user charges which may result in changes to the user charges being proposed. The <a href="#">CPAP</a> also provides that the charge may be varied from time to time to account for inflation.  The procedure described in 4.3 of the <a href="#">CPAP</a> must be followed which includes that members of STIG will be consulted on any proposed changes.
1.5.18	Suggest reviewing charges for tunnels after a set period of time	As above – combined response.
1.5.19	Suggest only charging for one of the two tunnels (either Silvertown or Blackwall but not both)	The purpose of introducing tunnel user charges for the Silvertown and Blackwall tunnels is to manage traffic effectively, mitigate any environmental impacts and deliver the expected transport economic benefits. The user charges will also provide a means of helping to pay for the design and construction of the Silvertown Tunnel and the on-going maintenance and operation of the Silvertown and Blackwall tunnels.  While the nearby Blackwall Tunnel is currently free to use, it suffers from chronic issues of congestion and regular traffic incidents, meaning the cross-river road network has poor resilience with no suitable alternative crossings in this part of London. This has a significant negative impact on travel, the economy and the environment across wide areas of east and southeast London. Regular tailbacks lead to miles of queuing traffic and poor air quality.  If we introduce a user charge on only one of these neighbouring tunnels and not the other, the benefits of the project will not be realised. Drivers will favour the non-charged tunnel, despite its constraints, and will not make best use of the new infrastructure. Given the tunnels' proximity on the south side, if the Blackwall Tunnel were not subject to a charge, queues would build up as they do today and inhibit access to the Silvertown Tunnel. As well as removing the benefit of reduced congestion, other benefits such as the opportunity for enhanced cross-river bus provision would be eroded.  Implementing user charges at both tunnels was discussed during the public examination for the project in 2016 and reasoning set out in the <a href="#">CPAP</a> . It includes why it is

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		fundamental for traffic demand management and to successfully deliver all the <a href="#">POs</a> that the Blackwall Tunnel be charged along with the Silvertown Tunnel.
1.5.20	Suggest only charging commercial/business vehicles	The approach to setting the user charges has been described in detail in the <a href="#">Supplementary Information</a> made available as part of the consultation. Charging only commercial vehicles would not enable us to manage demand effectively and meet the <a href="#">POs</a> and so is not considered appropriate. If only a relatively small proportion of vehicles were charged, the demand management effects would be diminished and the benefits of the additional capacity would quickly disappear as more uncharged vehicles used the tunnels. The impact of a high proportion of uncharged vehicles would be a return to congestion and delay, and the commercial and business vehicles which were subject to user charges would not see journey time savings benefits. In addition this would not meet the criteria of being fair and justified, since all vehicle users will benefit from the new crossing and will also have impacts in terms of wear and tear and local impacts on air quality.
1.5.21	Suggest there should be no charge on Sundays and/or bank holidays	<p>It is proposed that different charges would apply in the peak (certain times on weekdays) and at off-peak times (weekdays outside of peak period and all of the weekend) for customers registered for Auto Pay. For customers not registered for Auto Pay, peak charges apply during charging hours.</p> <p>This approach reflects the demand for the crossings - we have a higher charge in times (and directions of travel) where there is greater demand and when demand is lower we have lower charges, or no charges (as is the case between 22:00 – 06:00). With regard to weekends and public or bank holidays, demand is lower but is not zero, and there are still impacts from traffic, so it is appropriate to have lower off-peak user charges for customers registered for Auto Pay.</p> <p>See our response to issue 1.5.10 above for more commentary on the setting of charging hours.</p>
1.5.22	Suggest there should be no charge on Sundays	As above – combined response.
1.5.23	Suggest charges are applied for 24/7 (all hours of the day and all days of the year)	<p>It is proposed that different charges would apply in the peak (certain times on weekdays) and at off-peak times (weekdays outside of peak period and all of the weekend) for customers registered for Auto Pay. For customers not registered for Auto Pay, peak charges apply during charging hours.</p> <p>This reflects the demand for the crossings - we have a higher charge in times (and directions of travel) where there is greater demand and when demand is lower we have lower charges, or no charges (as is the case between 22:00 – 06:00). It is not considered necessary or expedient to charge 24/7 to achieve the <a href="#">POs</a> at this time. In addition, Policy 2 of the <a href="#">CPAP</a> states that TfL must ensure that user charges are fair, justified and will not undermine the <a href="#">POs</a>.</p>
1.5.24	Suggest charges should be lower/discounted for return journeys	Please see our response to issue 1.5.14 above which addresses this issue.

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		Given that the user charges vary by time of day and direction of travel, it would be expected that some return journeys will incur lower charges than the outbound trip (and vice versa).
1.5.25	Suggest charging based on number of miles travelled	The tunnels user charges consulted on relate only to user charges for trips through the Blackwall and Silvertown Tunnels. As this is a clearly defined charging area, a distance-based approach would not be appropriate. There are no plans to introduce pay-per-mile road user charging in London.
1.5.26	Suggest charging all vehicles/users the same amount	The proposed initial user charges vary by type of vehicle in recognition of the different magnitude of impact - including for example environmental, wear and tear on the road, congestion - caused by these different vehicle types. The charges have been set at levels which reflect these impacts and enables us to effectively manage demand for the tunnels so that all users benefit from the additional capacity it provides.
1.5.27	Suggest charges should be limited capped per week/month/year	<p>The purpose of introducing tunnel user charges for the Silvertown and Blackwall tunnels is to manage traffic demand effectively. This will allow us to support economic and population growth and the other minimise any adverse impacts on communities, health, safety and the environment, allowing the scheme to achieve its <a href="#">POs</a>.</p> <p>Introducing a season ticket or carnet, which would mean the cost of crossings was less than paying for separate charges could encourage additional journeys to be made by car due to potential sunk costs and thereby undermining the <a href="#">POs</a>. Managing traffic demand and the consequent environmental impacts are the main reasons for the user charges. A secondary reason for the user charge is to provide a means of helping to pay for the design, construction and on-going maintenance and operation.</p> <p>See our response to issue 1.5.13 above for more commentary on the suggestion of creating an annual ticket.</p>
1.5.28	Suggest charges should be higher for those living/travelling from outside of London	As described in the consultation information, the user charges are based on a number of variables (for example, time of day and type of vehicle). There is no proposal to charge drivers from outside London differently as we would be unable to achieve the <a href="#">POs</a> and would also be very challenging to implement. We are proposing a 50 per cent discount for eligible local low-income residents for at least the first three years following the opening of the Silvertown Tunnel.
1.5.29	Suggest charges should be based on the income of the user	We have proposed a 50 per cent discount for eligible residents of east and southeast London boroughs on certain low-income benefits which would apply for at least the first three years following the opening of the Silvertown Tunnel. However, it is not practical or appropriate to align all of the user charges to an individual's income: collecting and verifying this type of data would be highly intrusive for customers and create risks around verification for TfL (other types of TfL concession, for example the Student Oyster or the Jobcentre Plus travel discount) are based on existing criteria rather than TfL defining and collecting income-related data at an individual level.

Ref	Issue raised	Draft response
<b>2.</b>	<b>Off-peak Charges</b>	
<b>2.1.</b>	<b>Off-peak charges - general oppose</b>	
2.1.1	Oppose/disagree with the proposed off-peak charges/charging during off-peak (general comment)	<p>Setting the level of the user charges is supported by extensive traffic modelling and environmental assessment work. In setting the proposed user charges (including charge levels for different vehicles, charging hours, discounts and exemptions, and other factors), we have considered a range of factors, including the potential impact on the road network, the environment and the impact on different groups identified through an <a href="#">EqIA</a>. We considered a range of user charge levels to determine which would most effectively contribute to achieving the <a href="#">POs</a>.</p> <p>The inclusion of peak and off-peak charges based on the day, time of day and on directional flow reflects the patterns of demand for the tunnels, and the need to deploy user charges which can effectively manage this.</p> <p>Not charging or charging less during the off peak would attract too much demand to the Silvertown and Blackwall tunnels and would not allow us to meet the <a href="#">POs</a> as set out in the <a href="#">UCAF</a>.</p> <p>We have sought to minimise user charges to a level where we can still meet the <a href="#">POs</a> as set out in the <a href="#">UCAF</a>. For customers using Auto Pay, standard off-peak charges would apply most of the time</p>
<b>2.2.</b>	<b>Off-peak charges - should be higher</b>	
2.2.1	Suggest proposed off-peak charges should be higher (general comment)	As above – combined response.
<b>2.3.</b>	<b>Off-peak charges - should be lower</b>	
2.3.1	Suggest proposed off-peak charges are too expensive/should be lower (general comment)	As above – combined response.
2.3.2	Suggest proposed off-peak charges are too expensive/should be lower for motorcycles/mopeds/motor tricycles (general comment)	<p>Motorcycles like all other vehicles will benefit from the new tunnel through journey time savings, more reliable journeys and increased network resilience.</p> <p>As their impact is deemed to be less than other road users their charges are the lowest possible. In the off-peak, they pay the same as cars.</p> <p>We have sought to minimise user charges to a level where we can still meet the <a href="#">POs</a> as set out in the <a href="#">UCAF</a> and in the off-peak £1.50 is the lowest possible charge for any vehicle type without the risk of eroding the <a href="#">POs</a>.</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
2.3.3	Suggest proposed off-peak charges are too expensive/should be lower for cars (general comment)	We have sought to minimise user charges to a level where we can still meet the <a href="#">POs</a> (as per <a href="#">UCAF</a> ). Cars have the lowest user charges (alongside motorcycles) in the off-peak (£1.50).
<b>3. Peak Charges</b>		
<b>3.1. Peak charges - general oppose</b>		
3.1.1	Oppose/disagree with the proposed peak charges/charging during peak (general comment)	<p>Setting the level of the user charges is supported by extensive traffic modelling and environmental assessment work. In setting the proposed user charges (including charge levels for different vehicles, charging hours, discounts and exemptions, and other factors), we have considered a range of factors, including the potential impact on the road network, the environment and the impact on different groups through an Equalities Impact Assessment. We considered a range of user charge levels to determine which would most effectively contribute to achieving the .</p> <p>The inclusion of peak and off-peak charges based on the day, time of day and on directional flow reflects the patterns of demand for the tunnels. To effectively manage demand for the tunnels, user charges are required.</p> <p>Demand is at its highest northbound in the morning peak of weekdays and southbound in the evening peak and so it is necessary to impose a higher charge at this time compared to in the off-peak and at weekends in order to effectively manage demand at the crossings and meet the <a href="#">POs</a>.</p>
<b>3.2. Peak charges - should be higher</b>		
3.2.1	Suggest proposed peak charges should be higher (general comment)	As above – combined response.
<b>3.3. Peak charges - should be lower</b>		
3.3.1	Suggest proposed peak charges are too expensive/should be lower (general comment)	<p>Peak charges are only applicable where demand is at its highest which is on weekdays only, in the northbound direction in the morning peak and southbound direction in the evening peak. This helps to meet the <a href="#">POs</a> (PO2, improving network performance, PO5, manage any impacts on local communities and PO7, managing congestion). By having a higher charge in times of greatest demand, the deterrent effect is greater, and we are better able to meet the <a href="#">POs</a>.</p> <p>The user charges have been set at a level where can still meet the <a href="#">POs</a> (as per <a href="#">UCAF</a>), balancing being fair and justified in the price set whilst achieving Policy 2.</p> <p>Please refer to <a href="#">Section 1 'General Charges'</a> for additional information on our approach to charging:</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<ul style="list-style-type: none"> <li>• For charges being too expensive/should be lower generally, see response to issue 1.3.1 in Section 1 to this table.</li> <li>• For charges being too expensive/should be lower for motorcycles/mopeds/motor tricycles, see response to issue 1.3.2 in Section 1 to this table.</li> <li>• For charges being too expensive/should be lower cars, see response to issue 1.3.2 in Section 1 to this table.</li> <li>• For charges being too expensive/should be lower small vans, see response to issue 1.3.2 in Section 1 to this table.</li> <li>• For charges being too expensive/should be lower large vans, see response to issue 1.3.2 in Section 1 to this table.</li> <li>• For charges being too expensive/should be lower for HGVs, see response to issue 1.3.2 in Section 1 to this table.</li> </ul>
3.3.2	Suggest proposed peak charges are too expensive/should be lower for motorcycles/mopeds/motor tricycles (general comment)	As above – combined response.
3.3.3	Suggest proposed peak charges are too expensive/should be lower for cars (general comment)	As above – combined response.
3.3.4	Suggest proposed peak charges are too expensive/should be lower for small vans (general comment)	As above – combined response.
3.3.5	Suggest proposed peak charges are too expensive/should be lower for large vans (general comment)	As above – combined response.
3.3.6	Suggest proposed peak charges are too expensive/should be lower for heavy goods vehicles (HGVs) (general comment)	As above – combined response.
<b>4. Auto Pay</b>		
<b>4.1. Auto Pay</b>		
4.1.1	Concern that it is unfair/expensive to charge peak charges to those without Auto Pay/suggest should be the same charge level whether or not paid via Auto Pay	<p>In the Assessed Case that formed part of the <a href="#">DCO</a> application, it was proposed that non-account (Auto Pay) holders would be liable to pay a 'headline charge' during all charging hours. The headline charge was as per Auto Pay peak charge plus £1. It was considered appropriate to charge customers registered for Auto Pay less to incentivise registration for Auto Pay given the customer benefits and reduced administration costs (and at the time, a £1 discount on the Congestion Charge) was also available to customers using Auto Pay, although a £10 annual registration fee applied).</p> <p>Circumstances have changed since the time of the DCO application and there is now no longer a £1 discount on the Congestion Charge or a charge to set up an Auto Pay account, meaning that the 'headline charge' approach is no</p>



Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>longer appropriate. The removal of the headline charge provides an incentive for customers to move to Auto Pay by simplifying the schedule of charges and reduces the overall cost. It was proposed that non-account holders would pay the equivalent of the account holder's peak charge during all charging hours.</p> <p>Customers paying via Auto Pay are able to benefit as they are able to pay standard off-peak charges at certain times of day and will not incur PCNs for forgetting to pay tunnel charges (as long as their account is active).</p> <p>For ULEZ and the Congestion Charge an average of 76 per cent of valid charges are paid for via Auto Pay meaning most customers for existing road user charging schemes are already using this method of payment. Customers who are already registered for AutoPay for Congestion Charge or ULEZ charges will not need to register again and will automatically benefit from the standard off-peak charges.</p>
4.1.2	Suggest charges should be cheaper than proposed for those paying via Auto Pay	As above – combined response.
4.1.3	Other comment/suggestion about Auto Pay	As above – combined response.
<p><b>4.2. Penalty Charge Notice</b></p>		
4.2.1	Oppose/disagree with the proposed Penalty Charge Notice/amount (general comment)	<p>User charges must be paid for every trip made through the tunnels (unless discounts or exemptions apply). For customers not registered for Auto Pay, charges can be paid any time from 65 working days (equivalent to 90 calendar days) in advance to midnight three days after travel. Failure to pay the correct user charge by the required deadline with result in a Penalty Charge Notice (PCN) being issued.</p> <p>Only one PCN would be issued per day for any individual vehicle irrespective of the number of unpaid trips made in the vehicle on that day. For example, if four trips are made in either tunnel on the same day and user charges are not paid in respect of some or all of the trips, only one PCN would be issued. The value of the PCN far exceeds four trips made (by any vehicle type).</p> <p>This approach and the amount of the PCN is considered sufficient to achieve the aim of deterring non-payment of the user charges.</p>
4.2.2	Suggest a different amount for the Penalty Charge Notice	As above – combined response.
4.2.3	Concern about people not being aware of charges/Auto Pay/deadlines	<p>Auto Pay is already the most popular means of paying for the Congestion Charge and (where applicable) ULEZ charges in London and is used by the majority of our customers.</p> <p>A comprehensive multi-channel public information campaign will be launched ahead of the Silvertown Tunnel opening and the commencement of charging for using the Silvertown and Blackwall tunnels to raise awareness and inform local residents, businesses and drivers and other potential tunnel users about how the tunnels will operate, hours of operation, user charges and how to pay them, including information on</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>how to register for Auto Pay, as well as for discounts and exemptions if required. This is consistent in setting Policy 2 for setting and varying the user charges (including the charge levels, the hours charged, the vehicles charges, discounts and exemptions and other factors related to user charging), we must ensure that we are fair, justified and will not undermine the Project Objectives.</p> <p>User charge signs and enhanced message signs will be placed on radial routes towards the tunnels and on the immediate approaches to remind drivers of the charge.</p> <p>A website checker tool will be available on the TfL website to check the charges for different vehicle types.</p>
<p><b>5. Impacts</b></p>		
<p><b>5.1. Impact – general</b></p>		
<p>5.1.1</p>	<p>Concern proposals/charging will negatively impact those on lower incomes</p>	<p>We recognise that the tunnels in areas where there are high levels of income deprivation, and we have assessed the potential impact of the user charges on people on lower incomes as part of our EqlA. Although the user charge will be a new cost for residents, the overall value of time savings to tunnel users is forecast to outweigh the charges, resulting in a net benefit.</p> <p>To support people on low-incomes we have proposed a 50 per cent discount on the user charges for people in receipt of certain income related benefits living within east and southeast London. This is in addition to 100 per cent discounts for people with vehicles in the disabled tax class and blue badge holders.</p> <p>Support is also provided in the form of travel concessions as part of the green and fair package of concessions and discounts, including free cross-river travel by bus and DLR for at least one year, and free travel by the proposed cross-river cycle shuttle-bus for at least one year.</p> <p>21 buses per hour at peak times on new cross-river bus routes 129 and Superloop SL4 as well as the existing 108 will enable residents on the Greenwich Peninsula to access over 43,000 more jobs within a 60-minute journey. Similarly, residents of West Silvertown will be able to access over 21,000 more jobs within a 60-minute journey. Of all the households within 400m of a bus stop on this new cross-river bus network, 60 per cent are in low-income areas and nearly 60 per cent do not have access to a car.</p> <p>Our <a href="#">EqlA</a> provides further detailed assessment of the potential impact of our proposals on people on low-incomes. The <a href="#">EqlA</a> also enables us to identify measures to mitigate impacts on local communities and the environment (PO5) and Policy 2.</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
5.1.2	Concern proposals/charging will negatively impact the economy/London	<p>We recognise that the tunnels are in areas with high levels of income deprivation, and we have assessed the potential impact of the user charges on people on lower incomes as part of our <a href="#">EqIA</a>. Although the user charge will be a new cost for residents, the overall value of time savings to tunnel users is forecast to outweigh the charges, resulting in a net benefit, such as businesses being able to serve more customers in a working day.</p> <p>To support people on low-incomes we have proposed a 50 per cent discount on the user charges for people in receipt of certain income related benefits living within east and southeast London. This is in addition to 100 per cent discounts for people with vehicles in the disabled tax class and blue badge holders.</p> <p>Support is also provided in the form of travel concessions as part of the green and fair package of concessions and discounts, including free cross-river travel by bus and DLR for at least one year, and free travel by the proposed cross-river cycle shuttle-bus for at least one year.</p> <p>21 buses per hour at peak times on new cross-river bus routes (129 &amp; Superloop SL4) as well as the existing 108 will enable residents on the Greenwich Peninsula to access over 43,000 more jobs within a 60-minute journey. Similarly, residents of West Silvertown will be able to access over 21,000 more jobs within a 60-minute journey. Of all the households within 400m of a bus stop on this new cross-river bus network, 60 per cent are in low-income areas and nearly 60 per cent do not have access to a car.</p> <p>Our <a href="#">EqIA</a> provides further detailed assessment of the potential impact of our proposals on people on low-incomes.</p> <p>When the Silvertown Tunnel opens, it is expected to increase access to jobs and homes in east and southeast London. Through monitoring, we'll measure changes in travel patterns and assess the impacts on businesses. Where possible, this monitoring will also seek to determine what changes are related to the new Silvertown Tunnel. This monitoring will continue for at least three years after the opening in spring 2025.</p>
5.1.3	Concern proposals/charging will negatively impact businesses (general comment)	<p>The forecast reduction in vehicle journey time and improvement in journey time reliability through the Blackwall Tunnel will deliver significant economic benefits for businesses. In the opening year, people travelling on business (including Light Goods Vehicles and Heavy Goods Vehicles drivers) are forecast to save 5,800 vehicle-hours per day due to the Project.</p> <p>To ensure discounts and exemptions are directed at those most in need and to help Londoners and businesses prepare, we are proposing to introduce a wide-ranging, green and fair package of bus and other public transport concessions in addition to the discounts and exemptions. Included is a £1 business discount on standard off-peak charges for small business, sole traders and charities</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>registered in the host boroughs for at least the first 12 months.</p> <p>Freight users will benefit from the new modern tunnel that can accommodate the largest freight vehicles. Fewer incidents, closures and delays at the Blackwall Tunnel and more reliable journey planning as well as the shared bus / HGV lane will also benefit the sector significantly. Larger vehicles are charged more because of their larger contribution to congestion, noise and emissions as well as wear and tear of the tunnels over time.</p> <p>The new cross-river bus network of 21 buses per hour at peak times on routes 129 and Superloop SL4 and lower journey times on the route 108 will enable residents on the Greenwich Peninsula to access over 43,000 more jobs within a 60-minute journey. Similarly, residents of West Silvertown will be able to access over 21,000 more jobs within a 60-minute journey.</p>
5.1.4	Concern proposals/charging will negatively impact small businesses/sole traders/tradespeople	As above – combined response.
5.1.5	Concern proposals/charging will negatively impact delivery companies/couriers	As above – combined response.
5.1.6	Concern proposals/charging will negatively impact charities/charity workers	<p>We recognise that some charity workers help to provide care, services and support to people who may be vulnerable in society, including multiple protected characteristic groups. Charity workers on low-incomes living in the area surrounding the tunnels may be eligible for the 50 per cent low-income residents' discount.</p> <p>As part of the green and fair package of concessions and discounts, we are also proposing a £1 discount on the standard off-peak charge for charities registered in the host boroughs for at least one year. Charities can register up to three vehicles to receive this discount. Furthermore, Community transport vehicles (9+ seats) are exempt.</p> <p>Two new cross-river bus routes (129 and Superloop SL4) will be provided through the Silvertown Tunnel, and there will be improvements to existing route 108. The bus service will increase from six buses per hour to 21 buses per hour at peak times. Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following the Silvertown Tunnel opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free cross-river bus journeys and free DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents. These will benefit charity workers in the area surrounding the tunnels who travel cross-river to access work or as part of their job who may be able to switch modes.</p> <p>Those who are unable to switch modes, re-route their journey or choose to continue to drive via the tunnels will</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		benefit from improvements in journey times and reliability, with forecast reduction in journey time of up to 20 minutes in the peak.
5.1.7	Concern proposals/charging will negatively impact healthcare/care workers	<p>We recognise the important role healthcare and care workers play in providing vital care and support to London's population, including some of London's more vulnerable groups. We also recognise that care workers and some healthcare workers may be on lower incomes.</p> <p>Those on lower incomes living in eligible east and southeast London boroughs may be eligible for income related benefits, which means they may be eligible for the low-income residents' discount which provides a 50 per cent discount on the user charges.</p> <p>Two new cross-river bus routes (129 and Superloop SL4) through the Silvertown Tunnel will be provided, and there will be improvements to existing route 108. The bus service will increase from six buses per hour to 21 buses per hour at peak times. We are proposing to offer travel concessions as part of the green and fair package of concessions and discounts, including free cross-river travel by bus and DLR for at least one year, and free travel by the proposed cross-river cycle shuttle-bus for at least one year.</p> <p>Care workers or people providing care who transport a person with a Blue Badge can register their vehicle to the care recipient's Road User Charging account prior to travel in order to receive a 100 per cent discount. Furthermore, when transporting an eligible person in receipt of care to an NHS appointment, they can claim the NHS patient reimbursement for their travel. NHS staff members are eligible for reimbursement if any of the following criteria is met:</p> <ol style="list-style-type: none"> <li>1. Those using their vehicles to carry any of the following: <ul style="list-style-type: none"> <li>• Bulky, heavy or fragile equipment/supplies</li> <li>• Patients' notes or other confidential material</li> <li>• Controlled drugs</li> <li>• Clinical waste, contaminated sharps, radioactive materials or non-medicinal poisons</li> <li>• Prescription-only medicines or waste medicinal products</li> <li>• Clinical specimens, body fluids, tissues or organs</li> </ul> </li> <li>OR</li> <li>2. Those responding to an emergency when on call.</li> </ol>
5.1.8	Oppose/concern that the proposals unfairly target/penalise motorists	<p>The <a href="#">DCO</a> for the Silvertown Tunnel which was made by the Secretary of State for Transport and is known as the Silvertown Tunnel Order 2018 provided for TfL to charge, with Policy 1 of the Charging Policies and Procedures stating that TfL must impose user charges at the Silvertown and Blackwall tunnels to the extent that it is necessary or expedient to achieve the <a href="#">POs</a>.</p> <p>User charges at both tunnels must be applied to effectively manage traffic demand and ensure the economic benefits of the project are delivered, as well as mitigate the environmental impacts. When setting the charges, we must</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>ensure that they are fair, justified and will not undermine the <a href="#">POs</a>.</p> <p>Residents will benefit from reductions in vehicle journey time and improvements in journey time reliability through the Blackwall Tunnel, with journeys forecast to be up to 20 minutes quicker in the peak. In the opening year, car commuters are forecast to save 1,500 vehicle-hours per day with public transport commuters saving 900 passenger-hours per day (07:00 – 19:00). If charges are not levied, traffic using both tunnels would increase, and drivers would continue to experience major delays. Delays and congestion contribute to poorer air quality levels.</p>
5.1.9	Concern proposals/charging will negatively impact commuters/those travelling to/from work	<p>Those using the tunnels (for travel to/from work) will benefit from reductions in vehicle journey time and improvements in journey time reliability through the Blackwall Tunnel, with journeys forecast to be up to 20 minutes quicker in the peak. In the opening year, car commuters are forecast to save 1,500 vehicle-hours per day with public transport commuters saving 900 passenger-hours per day (07:00 – 19:00).</p> <p>The new tunnel is forecast to reduce vehicle journey time through the Blackwall Tunnel (including bus route 108) and improve journey time reliability by reducing congestion and queuing on the tunnel approaches through capacity enhancements and demand management through user charges. It will also provide two new cross-river bus routes (129 &amp; SL4) through the Silvertown Tunnel, and the service will increase from six buses per hour to 21 buses per hour at peak times.</p> <p>In the Business Case for the tunnel, which has been developed in line with Government guidance, the value of these time savings to tunnel users is forecast to outweigh the cost of the user charge, resulting in a net benefit. Some residents from low-income households will also qualify for a 50 per cent discount to reduce the cost of the user charge, and small businesses and sole traders will benefit from £1 off the off-peak user charges for at least one year (subject to eligibility).</p>
5.1.10	Concern proposals/charging will negatively impact shift workers	<p>Charges will not apply at the tunnels from 22:00-06:00, and shift workers travelling between 19:00-22:00 will pay off-peak charges if paying via Auto Pay. Some shift workers from low-income households may also qualify for the low-income residents' discount if in receipt of certain benefits. For at least the first year, bus travel on any of the new routes for local residents, cross river DLR travel and the cross-river cycle shuttle-bus, will be free.</p> <p>Currently, the Blackwall tunnel is regularly closed in evenings due to planned and unplanned events, which can impact shift workers looking to commute via this route due to congestion and the need to reroute. The Silvertown Tunnel will help to minimise risk of closures at the Blackwall Tunnel impacting river crossings, and the user charge helps to ensure that demand is managed during the busiest periods.</p>
5.1.11	Concern proposals/charging will force people out of	The current congestion at peak times at the Blackwall Tunnel places significant constraints on the local economy.

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
	employment/cause them to change employment	<p>Unreliable journeys impact productivity, and the river can be a barrier to access to employment for local residents. The project seeks to address this, and the charge is a critical component alongside the green and fair package of concessions and discounts that will support those on low-incomes.</p> <p>21 buses per hour at peak times on new cross-river bus network including routes 129 and Superloop SL4 and lower journey times on the Route 108 will open up new journey opportunities in east and southeast London free for at least 12 months for local residents to support those living in the local area. These services will enable residents on the Greenwich Peninsula to access over 43,000 more jobs within a 60-minute journey. Similarly, residents of West Silvertown will be able to access over 21,000 more jobs within a 60-minute journey.</p> <p>We are monitoring the impact of the tunnel on population and employment and if we observe any negative effects, we will bring in mitigation measures.</p>
5.1.12	Concern proposals/charging will cause people to move away from the area	As above – combined response.
5.1.13	Oppose/concern that proposals are unfair to those living in/travelling from east/southeast London/will not improve travel for them	<p>Although the user charges will be a new cost for some drivers, the scheme also represents a significant investment in east and south-east London through addressing the chronic issues at the Blackwall Tunnel and the consequential impacts these have on the economy, environment and communities across east and south-east London.</p> <p>The new cross-river bus network of 21 buses per hour at peak times, including routes 129 and Superloop SL4 and lower and more reliable journey times on the route 108, will open up new journey opportunities in East/South-East London. These services will enable residents on the Greenwich Peninsula to access over 43,000 more jobs within a 60-minute journey. Similarly, residents of West Silvertown will be able to access over 21,000 more jobs within a 60-minute journey.</p> <p>Residents will benefit from reductions in vehicle journey time and improvements in journey time reliability through the Blackwall Tunnel, with journeys forecast to be up to 20 minutes quicker in the peak.</p>
5.1.14	Concern proposals/charging will have a negative impact on social/leisure activities/visiting friends and family	<p>The new tunnel is forecast to reduce vehicle journey time through the Blackwall Tunnel (including bus route 108) and improve journey time reliability by reducing congestion and queuing on the tunnel approaches through capacity enhancements and demand management through user charges.</p> <p>Those travelling cross-river will benefit from reductions in vehicle journey time and improvements in journey time reliability through the Blackwall Tunnel, with journeys forecast to be up to 20 minutes quicker in the peak.</p> <p>There are also improvements and increases from six buses per hour to 21 buses per hour at peak times to cross-river bus routes, including routes 129 and Superloop SL4 and</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>improvements to existing route 108 free for at least 12 months to support local residents.</p> <p>In the Business Case for the Scheme, which has been developed in line with Government guidance, the value of these time savings to tunnel users is forecast to outweigh the cost of the user charge, resulting in a net benefit. Low-income residents in east and southeast London boroughs will also qualify for a discount to reduce the cost of the user charge.</p>
5.1.15	Concern proposals/charging will have a negative impact on health and wellbeing (physical and mental)	<p>The new tunnel will enable faster and more reliable journey times, reduce the impact of traffic congestion on some of London's most polluted roads and provide more opportunities to cross the river by public transport with a network of zero-emission (at the tailpipe) buses offering new routes and better access to more destinations. These improvements in journey times and reliability and congestion will provide benefits to drivers and those travelling by bus which may help reduce physical and mental stresses associated with travelling cross-river at present through reduced congestion and an increase in the number of buses from six to 21 per hour at peak times.</p>
5.1.16	Concern proposals/charging will negatively impact those with disabilities/health issues	<p>The improvements to journey times and reliability is likely to improve accessibility for people with disabilities or health issues when travelling by private vehicle. However, we are also providing a number of concessions which may support people with disabilities. This includes a 100 per cent discount for people with a Blue Badge (as a driver or passenger), and an exemption for vehicles in the disabled tax class. People with disabilities living in the eligible east and southeast London boroughs who are in receipt of certain income-related benefits or living/travelling with a person in receipt of such benefits in these boroughs may be eligible for the low-income residents' discount, providing a 50 per cent discount on the user charges.</p> <p>Taxis and wheelchair accessible private hire vehicles will not pay the user charge, to ensure the project does not impact on the availability of these vehicles (all taxis are wheelchair accessible and currently around 400 PHVs are wheelchair accessible). Furthermore, PHVs which are zero emission capable will not pay the user charges (ZEC PHVs currently make up around 40 per cent of the fleet). Community transport vehicles (9+ seats) are also exempt. In this way we have provided some mitigation for people who may need to travel by private vehicle.</p> <p>People with disabilities or people with health issues who require travel to medical appointments as a driver or passenger may be eligible for reimbursement.</p> <p>We will also provide 21 buses per hour at peak times on two new cross-river bus routes (129 and Superloop SL4) through the Silvertown Tunnel, and to existing route 108. All of these routes will benefit from zero emission buses which are wheelchair accessible, and travel by wheelchair or mobility scooter is free on buses. We offer a free Travel Mentoring Project to help people using public transport in and around</p>



Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>London to become more confident and independent travellers.</p> <p>Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Project opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free cross-river bus journeys and free DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents. The entire DLR network is step-free.</p> <p>Our EqIA provides further detailed assessment of the potential impact of our proposals on people with disabilities.</p>
5.1.17	Concern costs will be passed on to residents/customers through goods/services	<p>The forecast reduction in vehicle journey time and improvement in journey time reliability through the Blackwall Tunnel will deliver a significant economic benefit for businesses. In the opening year, people travelling on business (including Light Goods Vehicles and Heavy Goods Vehicles drivers) are forecast to save 5,800 vehicle-hours per day due to the Project.</p> <p>Freight users will benefit from the new modern tunnel that can accommodate the largest freight vehicles. Fewer incidents, closures and delays at the Blackwall Tunnel and more reliable journey planning as well as the shared bus / HGV lane will also benefit the sector significantly. Larger vehicles are charged more because of their contribution to congestion, noise and emissions as well as wear and tear of the roads over time. Additionally, as part of the green and fair package of concessions and discounts, we are providing a £1 discount on the standard off-peak charge for small businesses registered in the host boroughs for at least one year.</p> <p>The user charges may provide businesses a more reliable journey and more fuel-efficient options when compared to taking an alternative route. However, it would be a decision for businesses to make against the cost benefits of travelling via this route whether they may pass on some or all of the cost of charges to customers.</p>
5.1.18	Concern proposals/charging will negatively impact those living outside of London	<p>Those living outside of London using the tunnels (for travel to/from work) will benefit from reductions in vehicle journey time and improvements in journey time reliability through the Blackwall Tunnel, with journeys forecasted to be up to 20 minutes quicker in the peak. In the opening year, car commuters are forecast to save 1,500 vehicle-hours per day with public transport commuters saving 900 passenger-hours per day (07:00 – 19:00).</p> <p>Some people living outside of London may also benefit from some of the discounts and exemptions including a 100 per cent discount for people with a Blue Badge (as a driver or passenger), and an exemption for vehicles in the disabled tax class.</p> <p>Those travelling from outside of London who do not wish to pay the user charge can also plan their journeys to use</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>alternative crossings in east London, including Rotherhithe Tunnel, Tower Bridge and Woolwich Ferry – all of which are free.</p> <p>To ensure that people living outside of London are aware of the charges before they come in effect in spring 2025, a comprehensive multi-channel public information campaign will be launched ahead of the Silvertown Tunnel opening and the commencement of charging for using the Silvertown and Blackwall tunnels. A multi-channel campaign will raise awareness and inform local residents, businesses and drivers and other potential tunnel users about how the tunnels will operate, hours of operation, user charges and how to pay them, including information on how to register for Auto Pay, as well as for discounts and exemptions if required.</p> <p>A vehicle checker tool will be available on the main TfL website to check the charges for your vehicle type.</p>
5.1.19	Concern the proposals will not make a difference to environmental impact/levels of pollution	<p>Our extensive modelling and assessments have shown that the Silvertown Tunnel project will help manage traffic congestion and emissions and support sustainable growth. The new modern tunnel will enable faster and more reliable journey times, reduce the impact of traffic congestion on some of London's most polluted roads and provide more opportunities to cross the river by public transport with a network of zero-emission (at the tailpipe) buses offering better access to more destinations.</p> <p>We are required through the DCO to ensure the benefits of the Silvertown Tunnel project are delivered, and that for the, environmental impacts are not materially worse than those forecast in the DCO. We have comprehensive plans in place for monitoring and, if necessary, further mitigation.</p> <p>Ahead of the Silvertown Tunnel opening, we have installed numerous traffic and air quality monitors and have also undertaken baseline socio-economic reporting to determine the impact of the tunnel on local communities and the economy.</p> <p>Monitoring of traffic and air quality has been undertaken since 2020 as it is important that we collect pre-opening baseline data. This data and updated modelling work, has been used to help set the right level for the user charge, plan the new bus network and inform pre-opening highway changes where required. All this work has been shared with the STIG.</p> <p>Once the tunnel opens, as well as continuing to monitor traffic and air quality levels, we have also committed to specific checks through the production of annual monitoring reports. This includes verification by independent air quality experts.</p>
5.1.20	Concern the proposals will have a negative environmental impact/increase pollution	As above – combined response.

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
5.1.21	Proposals will have another specified impact/concern the proposals will have other specified impacts (not captured by codeframe)	We have reviewed and taken into account all feedback from the user charge consultation as detailed by our other responses and have made amendments to the proposals where this has been considered appropriate whilst ensuring we achieve our <a href="#">POs</a> .
5.1.22	Concern proposals/charging will negatively impact those who are reliant on using cars/don't have viable alternatives	<p>Those from outside London using the tunnels (for travel to/from work) will benefit from reductions in vehicle journey time and improvements in journey time reliability through the Blackwall Tunnel, with journeys forecasted to be up to 20 minutes quicker in the peak. In the opening year, car commuters are forecast to save 1,500 vehicle-hours per day with public transport commuters saving 900 passenger-hours per day (07:00 - 19:00).</p> <p>To support people on low-incomes in east and southeast London we have proposed a 50 per cent discount on the user charges for people in receipt of certain income related benefits living within east and southeast London. This is in addition to 100 per cent discounts for people with a Blue Badge and with vehicles in the disabled tax class. People who require travel to medical appointments as a driver or passenger may be eligible for the NHS patient reimbursement scheme.</p> <p>Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Project opening to help support people switching to public transport for cross-river journeys in south-east London. This includes free cross-river bus journeys and free DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents. In addition to these concessions, we will also provide 21 zero-emission buses per hour crossing the river at peak times.</p>
5.1.23	Concern about the impact on the elderly/older people	<p>Our extensive modelling and assessments have shown that those travelling cross-river will benefit from reductions in vehicle journey time and improvements in journey time reliability through the Blackwall Tunnel, with journeys forecasted to be up to 20 minutes quicker in the peak.</p> <p>We are also providing a number of concessions which may support older people. This includes a 100 per cent discount for people with a Blue Badge (as a driver or passenger), and an exemption for vehicles in the disabled tax class. Older people living in the eligible boroughs who are in receipt of certain income-related benefits may be eligible for the low-income resident discount, providing a 50 per cent discount on the user charges.</p> <p>Taxis and wheelchair accessible private hire vehicles will not pay the user charge, to ensure the project does not impact on the availability of these vehicles. Furthermore, private hire vehicles which are zero emission capable will not pay the user charges. These make up a large proportion of the fleet and the proportion is increasing over time to meet licensing requirements. Community transport vehicles (9+ seats) are also exempt.</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>Older people who require travel to medical appointments as a driver or passenger may be eligible for the NHS patient reimbursement scheme.</p> <p>We will also provide 21 buses per hour at peak times on two new cross-river bus routes (129 and Superloop SL4) through the Silvertown Tunnel, and existing route 108. All of these routes will benefit from zero emission buses which are wheelchair accessible, and travel by wheelchair or mobility scooter is free on buses. Older people in London are eligible for travel concessions, including the 60+ Oyster Card and Freedom Pass, and we offer a free Travel Mentoring Project to help people using public transport in and around London to become more confident and independent travellers.</p> <p>Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Project opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free cross-river bus journeys and free DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents. The entire DLR network is step-free.</p> <p>Our EqIA provides further detailed assessment of the potential impact of our proposals on older people.</p>
5.1.24	Concern about the impact on minority ethnic groups	<p>We recognise that the tunnels are in an area of high ethnic diversity and our EqIA has assessed the potential impact on people from ethnic minority groups.</p> <p>Although the user charge will be a new cost for residents, the overall value of time savings to tunnel users is forecast to outweigh the cost, resulting in a net benefit. To support people on low-incomes in east and southeast London we have proposed a 50 per cent discount on the user charges for people in receipt of certain income related benefits living within east and south-east London. This is in addition to 100 per cent discounts for people with Blue Badges and with vehicles in the disabled tax class.</p> <p>21 buses per hour at peak times on new cross-river bus network including routes 129 and Superloop SL4 and lower journey times on the route 108 will enable residents on the Greenwich Peninsula to access over 43,000 more jobs within a 60-minute journey. Similarly, residents of West Silvertown will be able to access over 21,000 more jobs within a 60-minute journey. Of all the households within 400m of a bus stop on this new cross-river bus network, 60 per cent are in low-income areas and nearly 60 per cent do not have access to a car.</p> <p>To further support local residents, we have provided travel concessions as part of the green and fair package of concessions and discounts, including free cross-river travel by bus and DLR for at least one year, and free travel by the proposed cross-river cycle shuttle-bus for at least one year.</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>Our <a href="#">EglA</a> provides further detailed assessment of the potential impact of our proposals on people from minority ethnic groups.</p>
5.1.25	<p>Concern about impact on local residents/communities/restriction on their travel</p>	<p>It is considered that people are likely to continue to make cross-river journeys to access social links and networks, despite the user charge. Shifts in travel patterns and behaviour may occur, for example during off-peak periods or shifting to the bus network, which is enhanced through new and improved routes benefitting from reduced journey times and service reliability, with a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including SL4 Superloop route.</p> <p>Although the user charge will be a new cost for residents, the overall value of time savings to tunnel users is forecast to outweigh the cost, resulting in a net benefit. To support people on low-incomes in east and southeast London we have proposed a 50 per cent discount on the user charges for people in receipt of certain income related benefits. This is in addition to a 100 per cent discounts for people with a Blue Badge and exemption for vehicles in the disabled tax class.</p> <p>21 buses per hour at peak times on the new cross-river bus network including routes 129 &amp; Superloop SL4 and lower journey times on the Route 108 will enable residents on the Greenwich Peninsula to access over 43,000 more jobs within a 60-minute journey. Similarly, residents of West Silvertown will be able to access over 21,000 more jobs within a 60-minute journey. Of all the households within 400m of a bus stop on this new cross-river bus network, 60 per cent are in low-income areas and nearly 60 per cent do not have access to a car.</p> <p>To further support residents, we have provided travel concessions as part of the green and fair package of concessions and discounts, including free cross-river travel by bus and DLR for at least one year, and free travel by the proposed cross-river cycle shuttle-bus for at least one year.</p>
<p><b>5.2. Impact - traffic</b></p>		
5.2.1	<p>Proposals will not encourage car users to use other forms of transport/reduce car use/is incompatible with the Mayor's Transport Strategy</p>	<p>When the Silvertown Tunnel opens, we will deliver a significant improvement in alternative modes of transport to driving across the river. While some drivers will be prepared to pay the charge for a more reliable car journey with improved journey times, there will also be current drivers who may opt to make fewer journeys, switch to public transport, retime their journeys to avoid the peaks, change origin/destination or use alternative crossings.</p> <p>To support residents and businesses, and encourage people to use new public transport connections, we propose a package of concessions and discounts to make the scheme as green and fair as possible. These include a 50 per cent discount for low-income households in 13 east London boroughs and a £1 discount on the off-peak charge for small businesses, sole traders and charities in the three host boroughs. Local residents will also benefit from free cross-</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>river bus and DLR travel, as well as from a cross-river cycle shuttle-bus service, both free for at least 12 months after Silvertown Tunnel opens.</p> <p>There will be more opportunities for residents to cross the river by public transport, with a network of zero-emission buses. At present cross-river bus connectivity in east London is limited, with no crossing for double deck buses between Tower Bridge and the Dartford crossing. Now, in addition to the route 108 (via Blackwall Tunnel), we will be introducing the new Superloop SL4 route and route 129 will be extended, providing 21 cross-river buses per hour in each direction in the busiest times between 07:00 to 19:00 Monday to Friday. These improvements will transform cross-river travel and offer better access to jobs, education, retail and leisure opportunities in places like Canary Wharf and the Royal Docks. Travel on these new and enhanced routes will be free for at least 12 months from tunnel opening.</p> <p>The Silvertown Tunnel and associated user charging is directly referenced in the Mayor's Transport Strategy. Proposal 93 states, "<i>The Mayor, through TfL, will continue to support the construction and operation of the Silvertown Tunnel, together with the introduction of user charges on the Blackwall and Silvertown tunnels (once the latter is opened), to address the problems of traffic congestion and associated air pollution, frequent closures and consequential delays, and the lack of network resilience and reliability at the Blackwall Crossing.</i>"</p>
5.2.2	Proposals will encourage/increase car use	<p>Improving the resilience of the highway network at the river crossings in east and southeast London and improving the road network performance of the Blackwall Tunnel are key objectives for the Silvertown Tunnel project. The introduction of user charges at Silvertown and Blackwall tunnels is fundamental in achieving this and not encouraging or increasing car use.</p> <p>With new road projects, savings in journey time can often result in an increase in traffic on these routes as more drivers seek to benefit from the reduction in delay and congestion. The introduction of a user charge will help to manage vehicle demand using the tunnels, offsetting this effect. The user charges have been set using extensive traffic modelling and environmental assessment work which forecasts demand for different modes of transport and accounts a range of factors, including the potential impact on the road network, the environment and the impact on different groups.</p> <p>While some users will be prepared to pay the charge for the improved journey, there will also be current users who may opt to take fewer journeys, switch to public transport, travel at different times, change origin/destination or may use alternative crossings.</p> <p>To ensure the user charge remains responsive to changing conditions, we have secured the ability to vary the charge in the future should it be required. This will enable traffic demand to be managed to reduce congestion and the associated environmental impacts.</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
5.2.3	Concern the proposals will not reduce/improve levels of traffic/congestion/journey time in the surrounding area/generally	<p>The Blackwall Tunnel has approximately 700 closures a year on average, with around one million hours wasted each year as a result. If the tunnel is closed for only six minutes, the queue quickly extends to three miles. More significant closures result in traffic chaos across east and southeast London, as there are no suitable alternative river crossings available.</p> <p>There is a lack of highway river-crossings in east London compared to west, with only three crossings of the Thames east of Tower Bridge. This further impacts the opportunity for cross-river trips to be made by bus.</p> <p>Our extensive modelling and assessment work has shown that the Silvertown Tunnel project will effectively reduce congestion, support sustainable growth, and deliver an overall improvement in air quality. The new modern tunnel will enable faster and more reliable journey times, reduce the impact of traffic congestion on some of London's most polluted roads and provide more opportunities to cross the river by public transport with a network of zero-emission (at the tailpipe) buses offering new routes and better access to more destinations.</p> <p>The new tunnel will provide more opportunities for residents to cross the river by public transport, with a network of zero-emission buses. At present cross-river bus connectivity in east London is limited, with no crossing for double deck buses between Tower Bridge and the Dartford crossing. Now, in addition to the route 108 (via Blackwall Tunnel), there will be a new Superloop SL4 route and route 129 will be extended, providing 21 cross-river buses per hour- in each direction in the busiest times between 07:00 – 19:00 Monday to Friday, transforming cross-river travel and offering better access to places like Canary Wharf and the Royal Docks.</p>
5.2.4	Oppose/concern the proposals will increase levels of traffic and congestion. Question whether this is compatible with the Mayor's Transport Strategy and that the consultation has lacked clarity on how this will be monitored	<p>Our extensive development work has shown that the Silvertown Tunnel scheme will effectively reduce congestion, support sustainable growth, and deliver an overall improvement in air quality. The new modern tunnel will enable more reliable and improved journey times, reduce the impact of traffic congestion on some of London's most polluted roads and provide more opportunities to cross the river by public transport with a network of zero-emission (at the tailpipe) buses offering new routes and better access to more destinations. In addition, it will provide much needed resilience to the network, especially when there are closures at the Blackwall Tunnel, of which there are around 700 per year on average.</p> <p>The Silvertown Tunnel and associated user charging is directly referenced in the <a href="#">Mayor's Transport Strategy</a> (MTS). Proposal 93 states, <i>"The Mayor, through TfL, will continue to support the construction and operation of the Silvertown Tunnel, together with the introduction of user charges on the Blackwall and Silvertown tunnels (once the latter is opened), to address the problems of traffic congestion and associated air pollution, frequent closures and consequential delays,</i></p>

Ref	Issue raised	Draft response
		<p><i>and the lack of network resilience and reliability at the Blackwall Crossing.”</i></p> <p>Setting the level of the user charges is supported by extensive traffic modelling and environmental assessment work. In setting the proposed user charges (including charge levels for different vehicles, charging hours, discounts and exemptions, and other factors), we have considered a range of factors, including the potential impact on the road network, the environment and the impact on different groups through an <a href="#">Equality Impact Assessment (EqIA)</a>. We considered a range of user charge levels to determine which would most effectively contribute to achieving the <a href="#">Project Objectives (POs)</a>. Overall, the proposed charges performed best in delivering the <a href="#">POs when assessed through the User Charge Assessment Framework (UCAF)</a>. The assessment concluded the initial user charges are not forecast to give rise to materially new or materially different environmental effects to those reported in the Environmental Statement. The proposed charges are forecast to provide optimal performance against the POs delivering a large reduction in delay and congestion on tunnel approaches, while minimising the impact at nearby crossings.</p> <p>In relation to the plan for monitoring, the impacts and longer-term evaluation of the new Silvertown Tunnel will be measured through the <a href="#">Monitoring and Mitigation Strategy (MMS)</a> and changes to traffic levels and composition, road network performance, air quality and noise, together with socio-economic impacts will be fully monitored in line with its requirements.</p> <p>We are required to consult with <a href="#">STIG</a> on matters around planning and operating the scheme including on air quality and traffic monitoring, the setting of user charges and proposals for the new bus services. STIG members are statutory consultees for the proposed level of charges required to be paid for use of the tunnels and any exemptions and discounts.</p> <p>We have published all relevant baseline monitoring data as and when it has been available throughout the monitoring period, which began in 2020 and will extend for at least three years after the tunnel opens. The STIG papers are publicly available on the <a href="#">STIG website and</a> provide a record of matters that have been discussed and decisions made. Quarterly monitoring reports will be shared with STIG and published in the first year of opening and annually thereafter. We are also required to review the user charges once the tunnel has been operational for 12 months, and, if necessary, we must revise the charges to mitigate any significant adverse impacts attributable to the Scheme which were not predicted in the pre-opening assessment.</p> <p>Our longer-term evaluation of the key impacts of the scheme will be published annually in the form of a dedicated ‘Travel in London’ Focus report. This will summarise the overall impacts in the context of wider changes affecting London and in terms of contribution to the aims of the MTS. The report</p>



Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		will also include our monitoring of the wider transport, environmental and social and economic impacts of the scheme. A baseline report will be published before the tunnel opens (expected spring 2025), with annual publications thereafter.
5.2.5	Concern the proposals will not reduce/improve levels of traffic/congestion/journey time for those using the tunnels	<p>The purpose of introducing tunnel user charges for the Silvertown and Blackwall tunnels is to manage traffic demand effectively and reduce congestion. This will allow us to support economic and population growth and the other minimise any adverse impacts on communities, health, safety and the environment, allowing the scheme to achieve its <a href="#">POs</a>.</p> <p>Within Policy 11 of the <a href="#">CPAP</a> we must keep the user charges under review, and will make variations to charges where this is considered necessary to ensure the continued achievement of the Project Objectives.</p> <p>In addition, as per Policy 15 in the <a href="#">CPAP</a>, we must complete a review of the user charges 12 months after the tunnel opens for public use and, if necessary, must revise the charges to mitigate any significant adverse impacts attributable to the project which were not predicted in the pre-opening assessment.</p>
5.2.6	Concern the proposals will increase levels of traffic/congestion/journey time for those using the tunnels	When it opens in spring 2025, the Silvertown Tunnel will help reduce delays and queues at the Blackwall Tunnel, with journey times up to 20 minutes faster at peak times. It will also help reduce the environmental impact of traffic congestion on some of London's most polluted roads and provide more opportunities to cross the river by public transport with a network of zero-emission (at the tailpipe) buses offering new routes and better access to more destinations.
5.2.7	Concern the proposals will increase use of other crossings/congestion at those (general comments)	<p>We are not expecting a significant number of drivers to divert to other crossings, such as Rotherhithe Tunnel, Tower Bridge, Woolwich Ferry and Dartford Crossing, to avoid the charges at the Silvertown (and Blackwall) tunnels and we expect negligible traffic impacts at these crossings as a result of the Silvertown Tunnel project.</p> <p>Our modelling indicates overall demand for the adjacent crossings is not expected to change significantly. Drivers that decide to divert to crossings such as Woolwich Ferry or Rotherhithe Tunnel are expected to be offset by people who currently choose to use those crossings but will instead start using the Silvertown and Blackwall tunnels due to the reduced congestion and shorter, more reliable journey times when the project tunnel opens.</p> <p>While our modelling does not indicate any material increases in traffic at other crossings because of the project, even with the charges at Blackwall, we are aware of the risk, and have a comprehensive monitoring plan in place which will continue once the project is operational. We will review and publish this monitoring data and will take action to mitigate any unexpected impacts including increased congestion or worse air quality.</p>
5.2.8	Concern the proposals will increase use of Rotherhithe	We are not expecting a significant number of drivers to divert to Rotherhithe to avoid the charges at the Silvertown (and

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
	Tunnel/increase congestion there	<p>Blackwall) tunnels and we expect negligible traffic impacts at the Rotherhithe Tunnel as a result of the Silvertown Tunnel project.</p> <p>Our modelling indicates overall demand for the adjacent crossings is not expected to change significantly. Users that decide to divert to crossings such as Woolwich Ferry or Rotherhithe Tunnel are expected to be offset by people who currently choose to use those crossings but will instead start using the Silvertown and Blackwall tunnels due to the reduced congestion and shorter, more reliable journey times when the project opens.</p> <p>While our modelling does not indicate any material increases in traffic at the Rotherhithe Tunnel because of the project, even with the charges at Blackwall, we are aware of the risk, and have installed comprehensive monitoring on the approaches to the Rotherhithe Tunnel which will continue once the project is operational. We will review and publish monitoring data and will take action to mitigate any unexpected impacts including increased congestion or worse air quality.</p>
5.2.9	Concern the proposals will increase use of Woolwich Ferry/increase congestion there	<p>We are not expecting a significant number of drivers to divert to the Woolwich Ferry to avoid the charges at the Silvertown (and Blackwall) tunnels and we expect negligible traffic impacts here as a result of the Silvertown Tunnel project.</p> <p>Our modelling indicates overall demand for the adjacent crossings is not expected to change significantly. Users that decide to divert to crossings such as Woolwich Ferry or Rotherhithe Tunnel are expected to be offset by people who currently choose to use those crossings but will instead start using the Silvertown and Blackwall tunnels due to the reduced congestion and shorter, more reliable journey times when the project opens.</p> <p>While our modelling does not indicate any material increases in traffic at the Woolwich Ferry because of the project, even with the charges at Blackwall, we are aware of the risk, and have installed comprehensive monitoring on the approaches to the Woolwich Ferry which will continue once the project is operational. We will review and publish that monitoring data and will take action to mitigate any unexpected impacts including increased congestion or worse air quality.</p>
5.2.10	Concern the proposals will increase use of Tower Bridge/increase congestion there	<p>We are not expecting a significant number of drivers to divert to other crossings, such as Tower Bridge to avoid the charges at the Silvertown (and Blackwall) tunnels and we expect negligible traffic impacts at these crossings as a result of the Silvertown Tunnel project.</p> <p>Our modelling indicates overall demand for the adjacent crossings is not expected to change significantly. Users that decide to divert to crossings such as Tower Bridge or Rotherhithe Tunnel are expected to be offset by people who currently choose to use those crossings but will instead start using the Silvertown and Blackwall tunnels due to the reduced congestion and shorter, more reliable journey times when the project opens.</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		While our modelling does not indicate any material increases in traffic at other crossings because of the project, even with the charges at Blackwall, we are aware of the risk, and have a comprehensive monitoring plan in place which will continue once the project is operational. We will review and publish this monitoring data and will take action to mitigate any unexpected impacts including increased congestion or worse air quality.
<b>6. Discounts</b>		
<b>6.1. Discounts - general comments</b>		
6.1.1	Comparisons/references made to discounts/exemptions as part of Congestion Charge/ULEZ/other charges	<p>In setting the discounts and exemptions for the scheme, we have considered the achievement of the <a href="#">POs</a>, the policies and procedures set out in the <a href="#">CPAP</a>, the equalities impacts and other relevant considerations such as our traffic management duties and our equalities duties.</p> <p>Within this context, we have in some instances aligned our discounts and exemptions with those provided as part of other road user charging schemes, which may aid customer understanding. However, due to the different objectives of each road user charging scheme and the different geographical areas in which they operate, discounts and exemptions for tunnel user charges have been developed in response to the particular circumstances of this scheme.</p> <p>This includes for example the requirements of Policy 5 and Policy 6, which specify that we must provide discounts to local businesses and residents (see <a href="#">CPAP</a> for full details). In developing these, and in developing other discounts and exemptions, we have taken into consideration how each would impact on local residents, businesses and people who may need to regularly drive through the tunnels. We must also take into consideration the impact the discounts and exemptions would have on the <a href="#">POs</a>, including impacts on traffic and congestion, air quality and the revenue impacts.</p>
6.1.2	Comparisons/references made to discounts/exemptions of other tunnels/crossings	<p>See our response to issue 560 above for information as to how the discounts and exemptions were developed.</p> <p>Charges for other tunnels / crossings charging schemes have been designed to support the objectives of the scheme in question. This includes their discounts and exemptions which will be scheme specific.</p> <p>The discounts and exemptions for this scheme have been developed to take into account the impacts of the charge, the composition of traffic and the purpose that the user charge serves.</p>
6.1.3	Other suggestion for who should receive a discount/exemption (unclear which referring to)	We have carefully considered the scope of discounts and exemptions in terms of the requirements of the <a href="#">DCO</a> and the <a href="#">CPAP</a> , in particular, Policy 2 and the need for the charges including the discounts and exemptions to be fair, justified and not undermine the <a href="#">POs</a> .

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>In developing our proposed discounts and exemptions we have sought to ensure they are effective and support those who may need them most; in considering any further discounts and exemptions (or widening the eligibility criteria), we must consider how this could impact the <a href="#">POs</a>, including impacts on traffic, air quality and revenue. With this in mind, it is not considered appropriate to make further changes at this time. The user charges are necessary to manage demand and ensure the benefits of the new capacity are long-lasting and not undermined by induced demand; they also help to pay for the design, construction and operation of the new tunnel. Providing further discounts and exemptions would undermine the achievement of these objectives.</p> <p>The green and fair package of concessions and discounts helps to ensure that as many people as possible can benefit from the improvements to cross-river travel the new tunnel will provide. All users of the tunnels will benefit from the improvements to journey times and reliability brought about by the additional capacity of the new tunnel, which is locked in by the user charges.</p> <p>In accordance with the <a href="#">CPAP</a> and Proposal 20 of the MTS, we will keep the user charge including discounts and exemptions under review and propose changes if they are considered necessary to ensure the continued achievement of the <a href="#">POs</a>.</p>
6.1.4	Oppose/disagree with the proposed discounts (general comment)	<p>In setting the discounts and exemptions for the Scheme, we have considered the achievement of the POs, the policies and procedures set out in CPAP (such as Policy 2, which says that the user charges must be fair, justified and not undermine the POs), the equalities impacts and other relevant considerations such as our traffic management duties and our equalities duties.</p> <p>In developing these, and in developing other discounts and exemptions under PO2, we have considered how widening the number of, or eligibility for, discounts and exemptions impacts on the <a href="#">POs</a>, including impacts on traffic and congestion, air quality and revenue. We have carefully considered the discounts we are providing and the eligibility for these to ensure they are effective and support those who may need them most. This includes local businesses, local residents, and groups who may need to travel via the tunnels regularly but may find it challenging to do so by public transport.</p>
6.1.5	Suggest discounts should be higher (general comment)	<p>Most of the discounts are set at 100 per cent of the user charge; the low-income residents' discount is set at 50 per cent.</p> <p>With regard to the residents' discount, the discount we have proposed will apply to more people than is required by Policy 6 of <a href="#">CPAP</a>: residents of 13 east and southeast London boroughs would be eligible rather than the three host boroughs originally specified.</p> <p>The business discount is set at £1 discount on off-peak user charges for at least 12 months. A 100 per cent discount is proposed for recovery and accredited breakdown vehicles,</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>vehicles with 9+ seats, Blue Badge holders, certain operational vehicles, taxis licensed in London and ZEC and WAV PHVs. The rationale for each 100 per cent discount is set out in the <a href="#">Supplementary Information</a> in the consultation material.</p> <p>Increasing the level of this discount could lead to more people choosing to drive rather than make the cross-river journey via alternative modes. In turn this would increase the number of vehicles using the tunnels, which may lead to increases in congestion and negative impacts on air quality. This diminishes the role of the user charge as an effective demand management tool, undermines the benefits of the additional capacity from the new tunnel, and risks our ability to achieve the <a href="#">POs</a>.</p> <p>We will keep the discounts and exemptions under review and will propose changes if they are needed to ensure the continued achievement of the <a href="#">POs</a>. The process for any future changes is set out in the <a href="#">CPAP</a>.</p>
6.1.6	Suggest discounts should be lower (general comment)	As above – combined response.
6.1.7	Discounts/eligibility is not clear/should be clearer (general comment)	Following the TfL Board’s decision, a comprehensive public information campaign will be launched ahead of the Silvertown Tunnel opening and the Silvertown and Blackwall tunnels charges having effect. A multi-channel campaign will raise awareness and inform local residents, businesses and drivers and other potential tunnel users about how the tunnels will operate, hours of operation, user charges and how to pay them, including information on how to register for Auto Pay, as well as for discounts and exemptions if required.
6.1.8	Suggest zero-emission/less-polluting vehicles should receive a discount	<p>A discount for low emission vehicles was assumed in the DCO proposals we previously consulted on almost a decade ago (October – November 2015). At that time the number of electric vehicles in London was relatively low and this was reflected in other road user charging schemes, specifically a 100 per cent discount for ultra-low emission vehicles for the Congestion Charge. Since then, there has been significant growth in these vehicles as a proportion and absolute number across London.</p> <p>If there are higher numbers of discounted vehicles, the scheme benefits would be lower and could be eroded over time and achievement of the <a href="#">POs</a> would be compromised. Moreover, Policy 10 of the <a href="#">CPAP</a> requires us to ensure that the initial user charges are ‘not likely to give rise to materially new or materially different environmental effects to those reported in the Environmental Statement’.</p> <p>This means that a discount for these vehicles would undermine the achievement of the <a href="#">POs</a> in terms of managing traffic demand and the wider impacts such as wear and tear on the tunnels.</p>
6.1.9	Other suggestion for who should receive a discount	<p>See our response to issue 6.1.1 above for information as to how the discounts and exemptions were developed.</p> <p>It is important to weigh the impacts of additional discounts against the need to manage demand for the tunnels. The</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>user charges are the principal means to do this and thereby manage the environmental and social impacts. Further discounts (and exemptions) run the risk of undermining the benefits of the tunnel.</p> <p>Not everyone will cross the river in a private vehicle. The support we are providing through the Project including the improvements to public transport and travel concessions provided as part of a green and fair package of concessions and discounts help to ensure that as many people as possible can benefit from the improvements to cross-river travel the Project will provide. Additionally, all tunnel users will benefit from the improvements to journey times and reliability when travelling cross-river.</p> <p>We will keep the discounts and exemptions under review and will propose changes if they are needed to ensure the continued achievement of the <a href="#">POs</a>. The process for any future changes is set out in the <a href="#">CPAP</a>.</p>
6.1.10	Suggest key workers should receive a discount (including NHS staff, care workers, emergency service staff)	<p>Key workers make up a large proportion of the workforce in London. Whilst we recognise the important role these workers play, offering discounts to all key workers would likely impact our ability to meet the POs. In addition, it would be very difficult to define and verify acceptable criteria for being a key worker.</p> <p>Key workers on low-incomes living in the area surrounding the tunnels may be eligible for a 50 per discount on the user charges through the low-income residents' discount. Others, such as carers providing domiciliary care may also be able to utilise the 100 per cent discount for Blue Badge holders when transporting a person with a Blue Badge (if the vehicle has been registered to the holder's account prior to travel). People who transport a passenger to medical appointments as part of their job may also be eligible for the NHS patient reimbursement scheme. As part of the green and fair package of concessions and discounts, we are also providing a £1 discount on the standard off-peak charge for small businesses, sole traders and charities registered in the host boroughs for at least one year, which may benefit some community and home care workers. Small businesses, sole traders and charities can register up to three vehicles to receive this discount. Our updated EqIA has assessed the potential impact of our proposed user charges on care workers and the provision of care.</p> <p>Some NHS Staff may be eligible for a reimbursement when carrying out certain functions as part of their job.</p> <p>We will also provide two new cross-river bus routes (129 and Superloop SL4) through the Silvertown Tunnel, and improvements to existing route 108. The bus service will be increased from six buses per hour to 21 buses per hour at peak times. Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following tunnel opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free cross-river bus journeys and free DLR</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents. These will benefit key workers living in the area surrounding the tunnels who travel cross-river to access work or as part of their job.</p> <p>It is recognised that some people will be working shifts at times where public transport is limited, such as late night or early morning. It should be noted that user charges do not apply at the tunnels from 22:00 – 06:00.</p> <p>We will keep the discounts and exemptions under review and will propose changes if they are needed to ensure the continued achievement of the <a href="#">POs</a>. The process for any future changes is set out in the <a href="#">CPAP</a>.</p>
6.1.11	Suggest TfL employees should receive a discount	As above – combined response.
6.1.12	Suggest charity workers/vehicles should receive a discount	<p>We recognise that some charity workers help to provide care, services and support to people who may be vulnerable in society, including multiple protected characteristic groups. Charity workers on low-incomes living in the area surrounding the tunnels may be eligible for a 50 per discount on the user charges through the low-income residents' discount.</p> <p>As part of the green and fair package of concessions and discounts, we are providing a £1 discount on the standard off-peak charge for charities registered in the host boroughs for at least one year. Small businesses and charities can register up to three vehicles to receive this discount. Community transport vehicles (9+ seats) are also exempt.</p> <p>We will also provide two new cross-river bus routes (129 and Superloop SL4) through the Silvertown Tunnel, and improvements to existing route 108. The bus service will be increased from six buses per hour to 21 buses per hour at peak times. Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following tunnel opening to help support local residents switching to public transport for cross-river journeys in southeast London. This includes free cross-river bus journeys and free DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents. These will benefit charity workers living in the area surrounding the tunnels who travel cross-river to access work or as part of their job who may be able to switch modes.</p>
<p><b>6.2. Discounts - low-income residents</b></p>		
6.2.1	Oppose/disagree with proposed 50% discount for low-income residents (general comment)	<p>We assessed a range of user charging scenarios, following the policies and procedures as set out in the Charging Policies and Procedures <a href="#">CPAP</a>. This entailed using the <a href="#">User Charging Assessment Framework (UCAF)</a> to identify how each scenario would contribute to successfully delivering the <a href="#">POs</a> including effective traffic demand management (and the associated economic and environmental impacts of this</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>demand) as well as ensuring that the initial user charges are 'not likely to give rise to materially new or materially different environmental effects to those reported in the Environmental Statement'. Overall, the proposed charges performed best in delivering the <a href="#">POs</a> whereas a zero-charge scenario performed badly.</p> <p>Policy 6 of the <a href="#">CPAP</a> document states that for the duration of the monitoring period (minimum of three years from opening) we will offer a minimum discount of 50 per cent to eligible residents of the host boroughs. We have gone beyond this requirement in proposing that this discount is offered to eligible residents of 13 east and southeast London boroughs, allowing additional people to benefit while continuing to manage the traffic demand and associated impacts as set out in PO2 and PO5.</p>
6.2.2	Suggest the discount should be higher for low-income residents/should be exempt	<p>In developing the low-income residents' discount, we have assessed a range of potential options, including different types of eligibility criteria, the level of discount and its geographical extent. It is proposed that the residents' discount is a 50 per cent discount available to eligible residents in receipt of certain low-income benefits in east and southeast London boroughs (meaning it is available to more people than set out in Policy 6).</p> <p>Further increasing the level of the discount could impact on the number of people who choose to drive cross-river who may be able to make the journey via alternative modes. This has a negative impact on the number of vehicles crossing via the tunnels, which may lead to increases in congestion and negative impacts on air quality. This diminishes the role of the user charge as an effective demand management tool and undermines our ability to achieve the <a href="#">POs</a>.</p> <p>We will keep the discounts and exemptions under review and will propose changes if they are needed to ensure the continued achievement of the <a href="#">POs</a>. The process for any future changes is set out in the <a href="#">CPAP</a>.</p>
6.2.3	Queries about what a low-income resident is/eligibility criterion should be clearer	<p>In determining the eligibility for low-income residents, we looked at previous projects which have an established track record and delivery mechanism such as the ULEZ scrappage scheme and the TfL bus / tram concession. As there is no universal definition of low-income, we have established a set of criteria that can be evidenced. Low-income has been defined as those who are in receipt of one of the following means-tested income benefits:</p> <ul style="list-style-type: none"> <li>• Income Support</li> <li>• Income-related Employment &amp; Support Allowance</li> <li>• Income-based Jobseekers Allowance</li> <li>• Universal Credit</li> <li>• Pension Credit</li> <li>• Child Tax Credit</li> <li>• Housing Benefit</li> <li>• Working Tax Credit</li> <li>• Carer's Allowance</li> </ul> <p>Further information on how to apply for this discount will be made available closer to the Silvertown Tunnel opening.</p>



Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
6.2.4	Other comment about eligibility/discounts for low-income residents - for example it should be limited to host Boroughs only or the ability to demonstrate car use as essential	<p>We will keep the discounts and exemptions under review and will propose changes if they are needed to ensure the continued achievement of the <a href="#">POs</a>. The process for any future changes is set out in the <a href="#">CPAP</a>.</p> <p>During our engagement with <a href="#">STIG</a> it was noted that in some neighbouring boroughs, low-income drivers living closer to the tunnels than those in the host boroughs would not qualify for a discount. During the Refreshed Assessment, we reviewed the impact of extending the discount beyond the three host boroughs and found that due to low car ownership, we could extend the offer while continuing to meet the Project Objectives.</p> <p>Low-income drivers in east and southeast London will need to confirm their primary residence is in one of the following boroughs: Barking &amp; Dagenham, Bexley, Bromley, City of London, Greenwich, Hackney, Havering, Lewisham, Newham, Redbridge, Southwark, Tower Hamlets and Waltham Forest and also provide evidence for proof of income. We do not have a method of assessing whether car use is essential and the concessions offered as part of the green and fair package of concessions and discounts will add as an additional incentive for journeys, where possible, to be shifted to public transport.</p>
6.2.5	Suggest students should receive a discount	<p>Students who commute to their place of study as a passenger or driver may be eligible for other discounts or exemptions, such as the 50 per discount on the user charges through the low-income residents' discount. Those who are unable to switch modes or choose to continue to drive via the tunnels will benefit from improvements in journey times and reliability, with forecast reduction in journey time of up to 20 minutes in the peak.</p> <p>We will also provide two new cross-river bus routes (129 and SL4) through the Silvertown Tunnel, and improvements to existing route 108. The bus service will be increased from six buses per hour to 21 buses per hour at peak times. Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following tunnel opening to help support local people switching to public transport for cross-river journeys in southeast London. This includes free cross-river bus journeys and free DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents.</p> <p>Outside of the travel concessions provided through the green and fair package, students in London are also potentially eligible for free and/or discounted travel by public transport with certain Oyster photocard. This includes the 18+ Student Oyster photocard, 16+ Zip Oyster photocard, and 11-15 Zip Oyster photocard.</p>
6.2.6	Suggest pensioners/retired people should receive a discount	<p>Our current support options will help to support many older people who may be on lower incomes and choose to travel by private vehicle. If we were to provide a discount or exemption to all older people, it would have a potential impact on traffic at the tunnels, which could impact on</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>achieving the <a href="#">POs</a>.</p> <p>We recognise that for some older people, the car may offer a more convenient and accessible mode of travel, and those who are unable to switch modes or choose to continue to drive via the tunnels will benefit from improvements in journey times and reliability, with forecast reduction in journey time of up to 20 minutes in the peak. Some older people who are eligible for a Blue Badge will receive a 100 per cent discount. People aged 60+ are more likely to be Blue Badge holders than any other age group. This discount can also be applied to a nominated vehicle they are travelling in prior to travel (up to two vehicles can be applied to the Blue Badge holder's RUC account at a time). Furthermore, those with a vehicle in the disabled tax class will receive an automatic exemption, and some may be eligible for the NHS patient reimbursement for trips to medical appointments as either a driver or passenger.</p> <p>Older people in London are more likely to travel by bus than any other mode. We will provide two new cross-river bus routes (129 and Superloop SL4) through the Silvertown Tunnel, and improvements to existing route 108. The bus service will be increased from six buses per hour to 21 buses per hour at peak times. Older people in London are able to travel for free by public transport in London if eligible for a Freedom Pass or 60+ London Oyster photocard. Older people may be more likely to be on lower incomes and therefore may be eligible for a 50 per discount on the user charges through the low-income residents' discount. Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following tunnel opening to help support people switching to public transport for cross-river journeys in south-east London. This includes free cross-river bus journeys and free DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents.</p> <p>We have assessed the potential impact of our proposals on older people as part of our EqIA.</p>
6.2.7	Suggest commuters/workers who regularly use the tunnels should receive a discount	<p>People commuting for work make up a large proportion of traffic at the tunnels, particularly in the peak period. If we were to exempt all commuters, it would negatively impact on the effectiveness of the user charges in managing demand and lead to continued congestion and delay, which would impact us achieving our <a href="#">POs</a>.</p> <p>Some people commuting to work or for work purposes may be eligible for a 50 per discount on the user charges through the low-income residents' discount. Those who are unable to switch modes or choose to continue to drive via the tunnels will benefit from improvements in journey times and reliability, with forecast reduction in journey time of up to 20 minutes in the peak.</p> <p>We will also provide two new cross-river bus routes (129 and Superloop SL4) through the Silvertown Tunnel, and</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>improvements to existing route 108. We are also increasing the bus service from six buses per hour to 21 buses per hour at peak times. Additionally, as part the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following tunnel opening to help support people switching to public transport for cross-river journeys in south-east London. This includes free cross-river bus journeys and free DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents.</p>
6.2.8	Suggest PHV drivers should receive a discount	<p>We have proposed a 100 per cent discount for private hire vehicles (PHVs) which are wheelchair-accessible and zero emission capable. Offering a 100 per cent discount to ZEC and/or WAV PHVs provides some mitigation for those groups more reliant on PHVs for travel without undermining the <a href="#">POs</a>. Furthermore, private hire drivers on lower incomes may be eligible for a 50 per discount on the user charges through the low-income residents' discount.</p> <p>We have considered whether it is appropriate to offer a 100 per cent discount to PHVs. There are some differences between the way that PHVs operate compared to taxis, such as PHV drivers and operators have the right to refuse bookings (taxis do not) and – unlike taxis – are not compelled to use the shortest available route to complete a booking.</p> <p>Another important difference is that PHV operators are free to set their own rates, while for taxis these are set annually by TfL. This means that PHV drivers and operators are able to choose not to accept cross-tunnel bookings and may choose to use routes avoiding the tunnel or adjust business models so only certain vehicles cross the tunnels. They are also able to adjust fares to reflect the user charges where they do choose to use the tunnels and there are examples of costs being passed on in their entirety, such as airport drop off charges.</p> <p>A further consideration is the relatively high number of PHVs in London: there are over 94,000 PHVs registered in London in October 2024<sup>5</sup> (increase from the over 92,000 reported in the consultation materials in April 2024). It is not proposed to offer a discount to all PHVs licensed in London because this would risk undermining our <a href="#">POs</a>.</p>
6.2.9	Suggest teachers/those working in education should receive a discount	<p>See our response to issue 6.1.10 above where we address this.</p>
6.2.10	Suggest disabled users should receive a discount (those without a Blue Badge)	<p>People with disabilities may be more reliant on a private vehicle for travel, either as a driver or a passenger, and we have assessed the potential impact of our proposals on people with disabilities in our <a href="#">EqIA</a>.</p> <p>To support people with disabilities, we have proposed a 100 per cent discount for Blue Badge holders (they can register up to two vehicles), and an exemption for vehicles in the disabled tax class.</p>

<sup>5</sup> [Licensing information - Transport for London \(tfl.gov.uk\)](https://tfl.gov.uk)

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>Many people with disabilities are also on lower incomes and may therefore be eligible for a 50 per discount on the user charges through the low-income residents' discount.</p> <p>Some people with disabilities who are able to do so may choose to switch modes, and to help support this switch, we are providing two new cross-river bus routes (129 and Superloop SL4) through the Silvertown Tunnel, and improvements to existing route 108. We are also increasing the bus service from six buses per hour to 21 buses per hour at peak times. Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following tunnel opening to help support local residents using public transport for cross-river journeys in south-east London. This includes free cross-river bus journeys and free DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents. Some people with disabilities may also be eligible for a Freedom Pass, and those with a wheelchair or mobility scooter can travel for free. All of our buses have level access. Those who require additional support in switching to public transport use can also access our free Travel Mentor project.</p> <p>Some people with disabilities may need to travel cross-river for regular medical appointments and may be eligible for the NHS patient reimbursement for these trips as either a driver or passenger.</p> <p>Those who are unable to switch modes or choose to continue to drive via the tunnels and are not eligible for our proposed discounts, exemptions and reimbursements will benefit from improvements in journey times and reliability, with forecast reduction in journey time of up to 20 minutes in the peak.</p>
6.2.11	Suggest tradesmen/contractors should receive a discount	<p>Our extensive modelling and assessments have shown that those travelling cross-river will benefit from reductions in vehicle journey time and improvements in journey time reliability through the Blackwall Tunnel, with journeys forecasted to be up to 20 minutes quicker in the peak. In the opening year, car commuters are forecast to save 1,500 vehicle-hours per day with public transport commuters saving 900 passenger-hours per day (07:00 – 19:00).</p> <p>Paragraph 21 of Schedule 2 to the <a href="#">DCO</a> creates a requirement for TfL to provide local business transitional support. In developing the eligibility criteria for the business discount, we have taken into consideration a number of factors: the need to comply with the policies and procedures of the <a href="#">CPAP</a> which make achievement of the <a href="#">POs</a> TfL's primary consideration when setting the user charges and the need to develop criteria which is robust and understandable.</p> <p>With this in mind we developed the following criteria: the standard off-peak £1 discount is proposed to apply to small businesses (under 50 employees), micro businesses (ten or fewer employees), sole traders (owned and operated within Greenwich, Newham or Tower Hamlets) and charities</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>registered with the Charities Commission as active within Greenwich, Newham or Tower Hamlets. Similar criteria were used for the recent ULEZ scrappage project and so we know it can work.</p> <p>Up to three vehicles per business or charity can be registered to receive the £1 standard off-peak discount.</p>
6.2.12	<p>Queries about whether proposed low-income residents' discount is required</p>	<p>Policy 6 of the <a href="#">CPAP</a> states that for the duration of the monitoring period (minimum of three years from opening) we will offer a minimum discount of 50 per cent to eligible residents of the host boroughs. We have assessed a range of potential options, including different types of eligibility criteria, the level of discount and its geographical extent. It is proposed that the resident discount is a 50 per cent discount available to eligible residents in receipt of certain low-income benefits in east and southeast London boroughs (meaning it is available to more people than set out in Policy 6).</p> <p>Not all people on lower incomes drive, and the most common mode of travel for people on lower incomes is by bus. However, some may still require use of a private vehicle for cross-river travel. Therefore, whilst we have provided enhancements to the cross-river bus network and provided travel concessions as part of the green and fair package of concessions and discounts, we believe it is still necessary to help support people on lower incomes to use the tunnels to undertake journeys where public transport may not be a viable option.</p> <p>The extended geographical extent of this discount will help to ensure that the potential impact of the user charges on people on lower incomes who live in areas where use of the tunnel may be required are able to benefit from the improvements provided by the new tunnel whilst reducing the potential financial impact the charges may have on them.</p>
6.2.13	<p>Suggest proposed 50% discount for low-income residents should be extended beyond three years/should be applied for a longer period</p>	<p>The low-income residents' discount is being provided for a minimum of three years. At this point, we will consider whether we will continue or amend this discount based on its effectiveness in supporting local residents on lower incomes, and its impact on meeting the <a href="#">POs</a>.</p>
6.2.14	<p>Suggest other criteria for who qualifies for the proposed low-income resident discount</p>	<p>In determining the eligibility for low-income residents, we looked at previous projects which have an established track record and delivery mechanism such as the ULEZ scrappage project and the TfL bus / tram concession. As there is no universal definition of low-income, we have established a set of criteria that re-uses existing criteria and can be relatively easily verified. Low-income has been defined as those who are in receipt of one of the following means-tested income benefits:</p> <ul style="list-style-type: none"> <li>• Income Support</li> <li>• Income-related Employment &amp; Support Allowance</li> <li>• Income-based Jobseekers Allowance</li> <li>• Universal Credit</li> <li>• Pension Credit</li> <li>• Child Tax Credit</li> <li>• Housing Benefit</li> <li>• Working Tax Credit</li> <li>• Carer's Allowance</li> </ul>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>We will keep our discounts and exemptions under review, and if considered necessary may extend or amend the eligibility criteria to ensure it remains effective.</p>
<p><b>6.3. Discounts - residents</b></p>		
6.3.1	<p>Discounts should apply to all London residents (general comment)</p>	<p>If a discount was applied to all London residents the <a href="#">POs</a> would not be met as demand for the crossings would increase as over 80 per cent of daily crossing trips originate in London.</p> <p>To help residents and businesses, and to support people to use new public transport connections, we have developed a package of discounts and concessions to make the scheme as green and fair as possible.</p>
6.3.2	<p>Suggest discounts should be for all residents local to tunnels/living in the surrounding area</p>	<p>We expect the proportion of journeys originating locally for Silvertown and Blackwall tunnels to be around 50 per cent. If all local residents were exempt or received a discount, the scheme would be less successful in delivering its objectives. Congestion at Blackwall tunnel would continue to be a problem, and traffic demand for the crossings would increase with consequent impacts on potential economic growth, local communities and the environment.</p> <p>We have developed a green and fair package of concessions and discounts for local residents on a low-income, businesses, sole traders and charities which includes free travel on any of the new routes for local residents, cross river DLR and the cross-river cycle shuttle-bus, for at least the first year.</p>
6.3.3	<p>Suggest all east London residents should receive a discount (regardless of income)</p>	<p>Following the Mayor's review of the scheme in 2016 additional support for local residents on low-incomes was proposed. Policy 6 set out that this discount would be available to eligible residents of the host boroughs of Greenwich, Newham and Tower Hamlets.</p> <p>Following our refreshed assessment of the impacts of the scheme, and in the interests of fairness following engagement with STIG we have now extended the geographical scope of the low-income discount to 13 boroughs in east and southeast London, meaning that more people will benefit from it. The discount will be available for a minimum of three years.</p> <p>It is not appropriate, however, to remove the income-based aspect of the discount, because the discount is specifically intended to mitigate the potential negative impacts of the user charge which people with a low-income are more likely to experience. This approach is used for other concessions, for example the bus and tram discount.</p> <p>Increasing the number of people in receipt of a discount may increase the number of people who choose to drive cross-river who might otherwise make the journey via alternative modes, or at less busy times of day. This has a negative impact on the number of vehicles crossing via the tunnels, which may lead to increases in congestion and negative impacts on air quality. This diminishes the role of the user charge as an effective demand management tool and risks</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
6.3.4	<p>Concern proposals are unfair as only offers discounts to east London residents/suggest should consider south London residents too</p>	<p>us failing to achieve the <a href="#">POs</a>, which we must consider in setting the user charges, discounts and exemptions.</p> <p>Some residents in southeast London boroughs may receive a 50 per cent discount if eligible for the low-income residents' discount. The list of boroughs in which the discount is available to eligible residents includes RB Greenwich; LB Bexley, LB Bromley, LB Lewisham, LB Southwark – all in south London. Policy 6 of the Charging Policies and Procedures document states that for the duration of the monitoring period (minimum of three years from opening) we will offer a minimum discount of 50 per cent to eligible residents of the host boroughs. We have assessed a range of potential options, including different types of eligibility criteria, the level of discount and its geographical extent. It is proposed that the resident discount is a 50 per cent discount available to eligible residents in receipt of certain low-income benefits in east and southeast London boroughs (meaning it is available to more people than set out in Policy 6).</p> <p>Increasing the number of people in receipt of a discount can impact on the number of people who choose to drive cross-river who may be able to make the journey via alternative modes. This has a negative impact on the number of vehicles crossing via the tunnels, which may lead to increases in congestion and negative impacts on air quality. This would diminish the role of the user charge as an effective demand management tool, and would undermine our ability to achieve the <a href="#">POs</a>.</p> <p>Unlike residents of the 13 boroughs eligible for the low-income resident discount, residents living west of these boroughs are potentially able to cross the river at alternative crossings and are less likely to be reliant on the tunnels as part of their cross-river journeys.</p>
6.3.5	<p>Other comment about discounts for residents</p>	<p>Policy 6 of the <a href="#">CPAP</a> states that for the duration of the monitoring period (minimum of three years from opening) we will offer a minimum discount of 50 per cent to eligible residents of the host boroughs. We have assessed a range of potential options, including different types of eligibility criteria, the level of discount and its geographical extent. It is proposed that the resident discount is a 50 per cent discount available to eligible residents in receipt of certain low-income benefits in east and southeast London boroughs (meaning it is available to more people than set out in Policy 6).</p> <p>Increasing the number of people in receipt of a discount can impact on the number of people who choose to drive cross-river who may be able to make the journey via alternative modes. This has a negative impact on the number of vehicles crossing via the tunnels, which may lead to increases in congestion and negative impacts on air quality. This diminishes the role of the user charge as an effective demand management tool, and risks us failing to achieve our <a href="#">POs</a>.</p> <p>We will keep the discounts and exemptions under review and will propose changes if they are needed to ensure the continued achievement of the <a href="#">POs</a>. The process for any future changes is set out in the <a href="#">CPAP</a>.</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
<b>6.4.</b>	<b>Discounts - £1 business discount on standard off-peak charges</b>	
6.4.1	Oppose/disagree with proposed £1 business discount on standard off-peak charges (general comment)	<p>This proposal fulfils Requirement 21 of the <a href="#">DCO</a> to provide businesses with business transitional support.</p> <p>The connectivity benefits of the new tunnel will increase the number of people who can access employment in east London, and by making journey times shorter and more reliable, improve conditions for businesses beyond the host boroughs.</p> <p>The host borough business discount is intended to support local business adapt to the charge. They may need additional time to retime journeys, change suppliers/deliveries or re-route to avoid using the crossing particularly at peak times. To ensure discounts and exemptions are directed at those most in need and to help Londoners and businesses prepare, we will introduce a wide-ranging, green and fair package of concessions and discounts of bus and other public transport concessions in addition to the discounts and exemptions. This includes a £1 discount on the standard off-peak charge for small businesses, sole traders and charities, for at least one year.</p>
6.4.2	Other suggestion for business discount amount/other comment about business discount on standard off-peak charges	We reviewed many different options to support local businesses transition to the charge. As part of the assessment, we liaised and listened to <a href="#">STIG</a> and stakeholders in order to propose the most suitable option in terms of achieving <a href="#">POs</a> , compliance with the <a href="#">CPAP</a> and practicability.
6.4.3	Suggest the proposed business discount should be higher	The discount has been set to support businesses with the transition to user charges at the Blackwall and Silvertown tunnels (as per Requirement 21 of the <a href="#">DCO</a> ) and to encourage trips to be made at less busy times. A car trip eligible for the discount would be £0.75. This is balanced against the need to manage traffic, demand and emissions at the crossings as set out in PO2 and PO5 which a higher discount would risk undermining.
6.4.4	Suggest the proposed business discount is extended to those outside the host boroughs	<p>Requirement 21 of the <a href="#">DCO</a> sets out that we shall support local businesses and seek to agree the support package with the three host boroughs. As described in the consultation materials, we have developed the discount for this area.</p> <p>Businesses further away from the crossing generally have a larger catchment which is not segregated by the river. Accordingly, they can adapt to the charge more easily as they have more possibilities to re-route and change suppliers/deliveries. This is not considered appropriate because of its potential impacts on the <a href="#">POs</a>.</p>
6.4.5	Suggest proposed business discount should apply to peak as well as off-peak times	This is not considered appropriate because of its potential impacts on the <a href="#">POs</a> in particular PO2 and PO5. Queues regularly occur at peak times. Providing a discount to a significant number of vehicles would not encourage them to retime journeys and deliveries outside of the peak.
<b>6.5.</b>	<b>100% discounts</b>	



Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
6.5.1	Oppose/disagree with proposed 100% discount for recovery and breakdown vehicles/they should be charged	PO2 is to improve the road network performance in east London: one of the main causes of congestion and delay currently is vehicles breaking down in or close to the Blackwall Tunnel. While the new tunnel will bring benefits to this in terms of adding capacity, and by virtue of being a larger and more modern tunnel, be less vulnerable to these problems, there will inevitably still be vehicle breakdowns from time to time. Imposing user charges on accredited recovery and breakdown vehicles would run counter to this objective. We will therefore give a 100 per cent discount to accredited vehicles, in accordance with the criteria already in operation for other road user charging schemes in London. This is likely to apply to only a relatively small number of vehicles and for a limited number of trips, so is not expected to negatively impact <a href="#">POs</a> .
6.5.2	Oppose/disagree with proposed 100% discount for vehicles with 9+ seats/they should be charged	As passenger-carrying vehicles, these types of vehicles are a more efficient use of road space than cars or motorcycles because they can transport more people, and often with lower emissions per person travelling than these other vehicles. The discount therefore helps to manage demand for the tunnels and helps to incentivise the use of more sustainable modes which aligns with our <a href="#">POs</a> .  These vehicles can also provide an important mode of transport for community groups and organisations supporting vulnerable groups including older people, young people, and people with disabilities.
6.5.3	Oppose/disagree with proposed 100% discount for Blue Badge holders/they should be charged	<a href="#">PO5</a> states that we must minimise any adverse impacts of any proposals on communities, health, safety and the environment. Policy 2 also provides that TfL must ensure that the charges including discounts and exemptions are fair, justified and will not undermine the <a href="#">POs</a> . With this in mind it is appropriate to offer a discount for disabled people with a Blue Badge, in recognition that they may have fewer public transport options and be less able to avoid the charge.
6.5.4	Suggest the discount for Blue Badge holders should be lower	Providing a 100 per cent discount for Blue Badge holders aligns with <a href="#">PO5</a> , Policy 2 and minimises the impact on a group who may find it more difficult to use public transport and may therefore be less able to avoid the charge. By not providing a 100 per cent discount for Blue Badge holders, we would risk disadvantaging multiple protected characteristic groups who may require a private vehicle to travel cross-river, including people with disabilities and older people.  Section 149 of the Equality Act 2010 creates the public sector equality duty ('PSED') which applies whenever TfL exercises its public functions including to the development of the Tunnels user charge. The public sector equality duty requires TfL to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; and to advance equality of opportunity, and foster good relations, between people who share a protected characteristic and those who do not. Protected characteristics under the Equality Act include age and disability. The Equality Impact Assessment undertaken in respect of the user charge identified that the provision of a 100 per cent discount for Blue Badge holders would help mitigate the negative impacts of the user charge on people who have less opportunity to

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		switch to alternative modes of transport and is consistent with the PSED.
6.5.5	Oppose/disagree with proposed 100% discount for certain operational vehicles used by the host boroughs/they should be charged	<p>The 100 per cent discount for certain operational vehicles ensures that essential service providers who may be impacted by the user charges can still function effectively. The discount would apply to certain vehicles used by local public sector authorities in the host boroughs. Following careful review of the consultation feedback we will extend this 100 per cent discount to waste collection and disposal vehicles in the 13 east and southeast London boroughs. This supports PO5 which states that we must minimise any adverse impacts of any proposals on communities, health, safety and the environment and PO6, that where possible that any proposals are acceptable in principle to key stakeholders, including affected boroughs.</p> <p>A lower discount for these vehicles would mean that the boroughs would incur an additional cost for operating these vehicles via the tunnels, which may impact on their ability to operate certain services. This would likely be opposed by the public sector authorities in the host boroughs and therefore risk us failing to achieve our <a href="#">POs</a>. As the majority of the vehicles on this discount are used for services within the borough it is unlikely that they will lead to significant numbers of cross river trips.</p>
6.5.6	Oppose/disagree with proposed 100% discount for Zero-Emission Capable private hire vehicles (PHVs)/they should be charged	<p>Currently around 40 per cent of the PHV fleet are ZEC (as defined by those which emit 75g/km of CO2 or less); from 2023 all newly registered PHVs were required to be ZEC. It is expected by 2033 all PHVs in the fleet will be ZEC.</p> <p>As already stated, offering a 100 per cent discount to ZEC PHVs, and Wheelchair Accessible PHVs, provides some mitigation for those groups more reliant on PHVs for travel. The 100 per cent discount for ZEC PHVs is expected to have a limited impact on our <a href="#">POs</a>.</p> <p>However, as the number of ZEC PHVs increases, the impact on traffic volumes at the tunnels will need to be kept under review with the first review planned for 12-months after the tunnel opens. In accordance with <a href="#">CPAP</a> Policy 11, and Proposal 20 of the MTS we will keep the user charge including discounts and exemptions under review and consider whether changes are needed to ensure our continued achievement of the <a href="#">POs</a>.</p>
6.5.7	Oppose/disagree with proposed 100% discount for wheelchair accessible private hire vehicles/they should be charged	<p>Around 400 PHVs are wheelchair accessible which is less than one per cent of the fleet. Therefore, an exemption for WAV and ZEC PHVs at tunnel opening is unlikely to have a negative impact on the relevant <a href="#">POs</a>.</p> <p>Providing a 100 per cent discount for these vehicles helps to ensure that the increase in cost is not passed onto people who may be more reliant on these vehicles, such as people with disabilities and does not impact the availability of options for those who need them. Our analysis shows that this will not risk achieving the <a href="#">POs</a> and we will keep under review to ensure they continue to support achieving <a href="#">POs</a>.</p>
6.5.8	Queries about eligibility criteria for 100% discounts/should be clearer	Following the TfL Board's final decision on the opening user charges, a comprehensive public information campaign will be launched ahead of the Silvertown Tunnel opening and the

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		commencement of charging for using the Silvertown and Blackwall tunnels. A multi-channel campaign will raise awareness and inform local residents, businesses and drivers and other potential tunnel users about how the tunnels will operate, hours of operation, user charges and how to pay them, including information on how to register for Auto Pay, as well as for discounts and exemptions.
6.5.9	Other comment about eligibility/proposed 100% discounts	<p>We have carefully considered the impact of proposed discounts to ensure they are effective and support those who may need them most. In identifying the proposed discount levels we have also considered the impacts on the <a href="#">POs</a>, including impacts on traffic, air quality and revenue.</p> <p>As required by Policy 11 of the <a href="#">CPAP</a> we will keep our discounts and exemptions under review to ensure they continue to support achieving <a href="#">POs</a>.</p>
<b>7. Exemptions</b>		
<b>7.1. Exemptions - general comments</b>		
7.1.1	Comparisons/references made to discounts/exemptions as part of Congestion Charge/ULEZ/other charges	See our response above to issue 6.1.1 in Section 6 above where we address this issue.
7.1.2	Comparisons/references made to discounts/exemptions of other tunnels/crossings	<p>There are five river crossings in London that are within the Congestion Charging Zone (Southwark Bridge, Blackfriars Bridge, Waterloo Bridge, Westminster Bridge and Lambeth Bridge), and all river crossings are within ULEZ. Other crossings outside London such as Dartford are subject to user charges managed by other authorities (in the case of the Dartford Crossing, National Highways), discounts and exemptions relevant to the area in which they operate, the composition of traffic and the purpose that the user charge serves.</p> <p>In setting the discounts and exemptions for the scheme, we have considered the achievement of the <a href="#">POs</a>, the policies and procedures set out in the <a href="#">CPAP</a>, the equalities impacts and other relevant considerations such as our traffic management duties and our equalities duties.</p> <p>In setting the discounts and exemptions, we have had to comply with the requirements of the <a href="#">DCO</a> and the <a href="#">CPAP</a>.</p>
<b>7.2. Exemptions – proposed</b>		
7.2.1	Oppose/disagree with the proposed exemptions (general comment)	<p>See our response to issue 6.1.1 in Section 6 above for information as to how the exemptions were developed.</p> <p>In setting the exemptions for the tunnel user charges, we have considered the achievement of the <a href="#">POs</a>, the policies and procedures set out in the <a href="#">CPAP</a> (including Policy 5 and Policy 6), the equalities impacts and other relevant considerations such as our traffic management duties and our equalities duties. Information on the rationale for the</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
7.2.2	Oppose/disagree with taxis (black cabs) not being charged/being exempt	<p>exemptions was provided in the Supplementary Information and the UCAF as part of the <a href="#">consultation materials</a>.</p> <p>Taxis have a vital role to play in London. All taxis licensed in London are required to be wheelchair accessible and have a range of other accessibility features. Taxis are unable to refuse a hiring within specified distances, which means they would be unable to avoid hirings which require tunnel crossing(s). Furthermore, taxis must make use of the shortest route, meaning they would be unable to avoid user charges by using an alternative longer route. We have proposed an exemption for taxis due to the important role they play in London in providing transport for those who may not be able to access other modes, the regulatory constraints they are subject to and the need to ensure that the user charges do not impact the level of service provision.</p> <p>As of April 2024, there were 14,776 taxis licensed in London; this is a small proportion of the overall number of vehicles using London's roads. Taxis also make up a relatively small percentage of the total daily traffic at Blackwall Tunnel, at one per cent in 2025 without Silvertown Tunnel, and it is expected that this would increase to two per cent of total traffic with the new tunnel. For these reasons, an exemption for taxis is fair and justified and would not undermine TfL's achievement of the <a href="#">POs</a>.</p>
7.2.3	Oppose/disagree with vehicles in the disabled tax class not being charged/being exempt	<p>PO5 states that we must minimise any adverse impacts of any proposals on communities, health, safety and the environment. Policy 2 also requires that the user charges are fair, justified and do not undermine the POs. With this in mind it is appropriate to exempt vehicles in the disabled tax class in recognition that people using these vehicles may have fewer public transport options. This approach is also taken for the Congestion Charge and ULEZ.</p> <p>The requirements of this user group are already recognised in the tax-exempt status afforded to these vehicles.</p> <p>The EqIA assesses how the provision of this exemption helps to ensure we are fulfilling our statutory duties.</p>
7.2.4	Oppose/disagree with military vehicles not being charged/being exempt	We propose to exempt military vehicles because they are used to provide a public service and there are limited alternatives available for this type of transport.
<p><b>7.3. Exemptions - other suggestions</b></p>		
7.3.1	Suggest all London residents should be exempt/should not be charged	<p>The primary purpose of the user charges is to manage traffic demand for the river crossings. By managing this traffic demand, we can support economic and population growth and minimise any adverse impacts on communities, health, safety and the environment, allowing the Scheme to achieve its POs. A secondary reason for the user charges is to provide a means of helping to pay for the design, construction and operation of the new tunnel.</p> <p>Exempting all London residents – who will make up a large proportion of users of the two tunnels - would undermine the achievement of the <a href="#">POs</a>.</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>We proposed certain discounts and exemptions to mitigate impacts on those who need them most, where these can be justified; in addition there are no charges between 22:00 and 06:00.</p>
7.3.2	<p>Suggest zero-emission/less-polluting vehicles should not be charged/should be exempt</p>	<p>This type of discount would have a negative impact on our ability to manage demand at the tunnels, and achieve the <a href="#">POs</a>, Therefore we no longer proposed to offer a cleaner vehicle or low emission vehicle discount.</p> <p>A discount for low emission vehicles was assumed in the <a href="#">DCO</a> proposals we previously consulted on. At the time of the consultation in 2014, the number of electric vehicles in London was relatively low and this was reflected in our wider charging policies, which for example included a 100 per cent discount for ultra-low emission vehicles for the Congestion Charge. Since then, there has been significant growth in these vehicles as a proportion and absolute number across London.</p> <p>If higher numbers of vehicles are discounted, the project benefits would be lower and could be eroded over time. Finally a further reason is customer understanding: this approach aligns with the Cleaner Vehicle Discount no longer being offered for the Congestion Charge from December 2025.</p>
7.3.3	<p>Suggest private hire vehicles (PHVs) should not be charged/should be exempt</p>	<p>See our response to issue 6.5.6 in Section 6 above where we address this issue.</p>
7.3.4	<p>Suggest motorcycles/mopeds/motor tricycles should not be charged/should be exempt</p>	<p>A key objective of the user charges is to manage demand and thereby lock in the benefits of additional capacity and, importantly, manage the effects of traffic on the environment.</p> <p>Motorcycles like all other vehicles will benefit from the scheme though journey time savings and more reliable journeys and the increased resilience afforded by the scheme.</p> <p>Motorcycles also contribute to congestion, noise and air pollution as well as wear and tear of road surfaces and, therefore, will be subject to user charges.</p>
7.3.5	<p>Suggest residents local to tunnels/living in the surrounding area should not be charged/should be exempt</p>	<p>We expect the proportion of journeys originating locally for Silvertown and Blackwall tunnels to be around 50 per cent. If all local residents were exempt, the scheme would be less successful in delivering its objectives. Congestion at Blackwall tunnel would continue to be a problem, and traffic demand for the crossings would increase with consequent impacts on potential economic growth, local communities and the environment.</p> <p>We have developed a green and fair package of concessions and discounts for local residents on a low-income, businesses, sole traders and charities which includes free travel on any of the new routes for local residents, cross river DLR and the cross-river cycle shuttle-bus, for at least the first year.</p> <p>---</p> <p>See our response to issue 6.3.2 in Section 6 above for additional information.</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
7.3.6	Queries about eligibility criteria for exemptions/should be clearer	Following the TfL Board's decision, a comprehensive public information campaign will be launched ahead of the Silvertown Tunnel opening and the Silvertown and Blackwall tunnels charges having effect. A multi-channel campaign will raise awareness and inform local residents, businesses and drivers and other potential tunnel users about how the tunnels will operate, hours of operation, user charges and how to pay them, including information on how to register for Auto Pay, as well as for discounts and exemptions if required.
7.3.7	Taxis (black cabs) should only be exempt if they are electric/ZEC/have low emissions	See our response to issue 673 above.  More than half of taxis in London are zero emission capable, and this number continues to increase as vehicles are upgraded to meet licensing requirements. Limiting the exemption to only zero emission capable taxis would only impact a limited and fast-decreasing number of vehicles, and due the aforementioned requirements for taxis to take the shortest route it would not impact the number of non-zero emission capable vehicles using the tunnels.
7.3.8	Suggest key workers should not be charged/should be exempt (including NHS staff, care workers, emergency service staff)	See our response to issue 6.1.10 in Section 6 above which addressed this issue.
7.3.9	Suggest charity workers/vehicles should not be charged/should be exempt	See our response to issue 6.1.11 in Section 6 above which addressed this issue.
7.3.10	Suggest TfL employees should not be charged/should be exempt	See our response to issue 6.1.12 in Section 6 above which addressed this issue.
7.3.11	Suggest students should not be charged/should be exempt	See our response to issue 6.2.5 in Section 6 above which addressed this issue.
7.3.12	Suggest pensioners/retired people should not be charged/should be exempt	See our response to issue 6.2.6 in Section 6 above which addressed this issue.
7.3.13	Suggest historic vehicles should not be charged/should be exempt	Historic vehicles like all other vehicles will benefit from the new tunnel though journey time savings, more reliable journeys and increased network resilience and as such should contribute. The user charges have been set at a level which reflects these impacts and enables us to effectively manage demand for the tunnel so that all users benefit from the additional capacity it provides.  We have sought to minimise user charges to a level where we can still meet the <a href="#">POs</a> as set out in the <a href="#">UCAF</a> and in the off-peak £1.50 is the lowest possible charge for any vehicle type without the risk of eroding the <a href="#">POs</a> .
7.3.14	Suggest small/local businesses should not be charged/should be exempt	We consider that the benefits of the scheme through improvements to journey times and reliability outweigh the cost of the user charges and will provide a benefit for small and local businesses, and therefore they should not receive an exemption.  As part of the green and fair package, we are also proposing a £1 discount on the standard off-peak charge for small

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>businesses registered in the host boroughs for at least one year to support them with the transition to paying user charges at the Blackwall and Silvertown tunnels.</p> <p>Providing an exemption would negatively impact the effectiveness of the user charges as a demand management tool, and impact our ability to achieve the <a href="#">POs especially PO2 and PO5</a>.</p>
7.3.15	Suggest commuters/workers who regularly use the tunnels should not be charged/should be exempt	See our response to issue 6.2.7 in Section 6 above which addressed this issue.
7.3.16	Suggest teachers/those working in education should not be charged/should be exempt	<p>We recognise the important role those working in education play in London. However, people commuting for work make up a large proportion of traffic at the tunnels, particularly in the peak period. If we were to provide an exemption to commuters such as teachers and those working in education, it would negatively impact on the effectiveness of the user charges in managing demand, which would impact us achieving the <a href="#">POs</a>.</p> <p>Some may be eligible for a 50 per discount on the user charges through the low-income residents' discount. Those who are unable to switch modes or choose to continue to drive via the tunnels will benefit from improvements in journey times and reliability, with forecast reduction in journey time of up to 20 minutes in the peak.</p> <p>We will also provide two new cross-river bus routes (129 and Superloop SL4) through the Silvertown Tunnel, and improvements to existing route 108. We are also increasing the bus service from six buses per hour to 21 buses per hour at peak times.</p> <p>Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following tunnel opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free cross-river bus journeys and free DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents.</p>
7.3.17	Suggest disabled users should not be charged/should be exempt (those without a Blue Badge)	See our response to issue 6.2.9 in Section 6 above which addressed this issue.
7.3.18	Suggest businesses/commercial vehicles should not be charged/should be exempt	<p>The forecast reduction in vehicle journey times and improvement in journey time reliability through the Blackwall Tunnel will help to deliver significant benefits for businesses. In the opening year, people travelling on business (including Light Goods Vehicles and Heavy Goods Vehicles drivers) are forecast to save 5,800 vehicle-hours per day due to the Scheme.</p> <p>The freight sector will benefit from the new modern tunnel that can accommodate the largest freight vehicles. Fewer incidents, closures and delays at the Blackwall Tunnel and more reliable journey planning as well as the shared bus /</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>HGV lane will also benefit the sector significantly. Larger vehicles are charged more because of their contribution to congestion and the damage to roads caused over time.</p> <p>If we were to exempt all vehicles used for business and commercial purposes, it would negatively impact the effectiveness of the user charges as a demand management tool and impact our ability to achieve the <a href="#">POs</a>.</p> <p>Furthermore, as part of the green and fair package of concessions and discounts, we are proposing a £1 discount on the standard off-peak charge for small businesses, sole traders and charities registered in the host boroughs for at least one year.</p>
7.3.19	Suggest private cars should not be charged/should be exempt	<p>Private cars make up a significant proportion of traffic at the tunnels. If we were to provide an exemption for all private cars, it would negatively impact the effectiveness of the user charges as a demand management tool and impact our ability to achieve the <a href="#">POs</a>.</p> <p>We have proposed a number of discounts and exemptions to help people who may require support in paying the user charges and may be less able to access alternative modes.</p> <p>Whilst the user charges will be a new cost for drivers, the improvements the Project will provide in journey time savings and reliability are considered to outweigh the cost and provide a benefit for drivers who choose to travel via the tunnels.</p>
7.3.20	Suggest delivery drivers/couriers should not be charged/should be exempt	See our response to issue 7.3.18 in Section 7 above which addressed this issue.
7.3.21	Suggest those on lower incomes should be exempt	<p>We recognise that the tunnels are located in an area with high levels of income deprivation, and we have assessed the potential impact of the proposals on people on lower incomes as part of our EqIA. Although the user charge will be a new cost for residents, the overall value of time savings to tunnel users is forecast to outweigh the cost of the charges, resulting in a net benefit. If we were to provide an exemption to all people on lower incomes, it would negatively impact the effectiveness of the user charges as a demand management tool and impact our ability to achieve the <a href="#">POs</a>.</p> <p>To support people on low-incomes we have proposed a 50 per cent discount on the user charges for people in receipt of certain income related benefits living within east and southeast London. This is in addition to 100 per cent discounts for people with vehicles in the disabled tax class and blue Badge holders.</p> <p>Support is also provided in the form of travel concessions as part of the green and fair package of concessions and discounts, including free cross-river travel by bus for local residents and DLR for at least one year, and free travel by the proposed cross-river cycle shuttle-bus for at least one year.</p> <p>21 buses per hour at peak times on new cross-river bus routes (129 and Superloop SL4) as well as the existing 108</p>



Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>will enable residents on the Greenwich Peninsula to access over 43,000 more jobs within a 60-minute journey. Similarly, residents of West Silvertown will be able to access over 21,000 more jobs within a 60-minute journey. Of all the households within 400m of a bus stop on this new cross-river bus network, 60 per cent are in low-income areas and nearly 60 per cent do not have access to a car.</p> <p>Our EqIA provides further detailed assessment of the potential impact of our proposals on people on low-incomes.</p>
7.3.22	Suggest those who work in London should not be charged/should be exempt	See our response to issue 6.2.7 in Section 6 above which addressed this issue.
<p><b>7.4. Reimbursements</b></p>		
7.4.1	Oppose/disagree with proposed NHS patient reimbursement	<p>Eligible NHS patients would be able to claim a reimbursement of the user charges if they meet certain criteria. Eligible NHS staff and patients are already reimbursed for the Congestion Charge and it is proposed that the same criteria and process would apply to reimbursement of the Tunnels User Charges.</p> <p>As set out in the EqIA, the NHS Patient reimbursement helps to ensure that access to health facilities is not negatively impacted for those unable to travel by public transport (subject to eligibility). This could benefit older people, disabled people and pregnant and maternal people to a greater extent than other groups. This helps to advance equality of opportunity to access healthcare.</p> <p>The NHS patient reimbursement is offered in recognition of the fact that user charges should not act as a barrier to patients accessing services if they are reliant on using a chargeable vehicle for certain medical related reasons. It is expected that this would result in small numbers of trips not being subject to user charges and so have little impact on the achievement of the other <a href="#">POs</a>.</p>
7.4.2	Oppose/disagree with proposed NHS staff reimbursement	<p>The NHS staff reimbursement recognises that certain staff in specific circumstances need to use their vehicles in order to fulfil their duties. NHS staff members, are eligible for reimbursement if any of the following criteria is met:</p> <ol style="list-style-type: none"> <li>1. Those using their vehicles to carry any of the following: <ul style="list-style-type: none"> <li>Bulky, heavy or fragile equipment/supplies</li> <li>Patients' notes or other confidential material</li> <li>Controlled drugs</li> <li>Clinical waste, contaminated sharps, radioactive materials or non-medicinal poisons</li> <li>Prescription-only medicines or waste medicinal products</li> <li>Clinical specimens, body fluids, tissues or organs</li> </ul> </li> </ol> <p>OR</p> <ol style="list-style-type: none"> <li>2. Those responding to an emergency when on call.</li> </ol> <p>It is expected that this would result in small numbers of trips not being subject to user charges and so have little impact on the achievement of the other <a href="#">POs</a>.</p>

Ref	Issue raised	Draft response
		Eligible NHS staff would be able to claim a reimbursement of the user charges if they meet certain criteria. Eligible NHS staff and patients are already reimbursed for the Congestion Charge and it is proposed that the same criteria and process would apply to reimbursement of the Tunnels User Charges.
<b>8.</b>	<b>Other Improvements and Comments</b>	
<b>8.1.</b>	<b>Proposed green and fair package of concessions and discounts - supporting measures</b>	
8.1.1	Suggest free cross-river cycle shuttle-bus provision should be made permanent	The proposal is for the cross-river bus routes (21 buses per hour on routes 108, 129 and Superloop SL4 at peak times) to be free for at least 12 months to encourage use of these new and improved bus services. Following opening, in the first year of operation, we will review uptake of the services, assess suitability of the timetable and make changes if necessary. The cross-river cycle shuttle-bus will run for at least three years, with the first year free. Following opening of the service, we will monitor use of the service. As part of this review, we will assess the impacts of making the shuttle free, discounted or fully charged beyond the opening year.
8.1.2	Suggest bus concession to support local residents using new cross-river bus services should be made permanent	As above – combined response.
8.1.3	Suggest free DLR journeys between Cutty Sark - Island Gardens and Woolwich Arsenal - King George V should be made permanent	We propose to make the first year free for the cross-river DLR journeys. Following opening of the tunnel, in the first year of operation, we will track uptake of the concession. As part of the review, we will also assess affordability of continuing the free DLR journeys beyond one year.
8.1.4	Suggest further improvements to the cross-river cycle shuttle-bus	Following the many helpful responses received during our earlier cross-river cycling consultation, we are engaging with our chosen service providers to understand and finalise what modifications can be made to vehicles and stopping locations to improve accessibility for all. An example of the modifications includes provision of cycle storage that can accommodate adapted cycles or a cargo bike.  We will continue to review and report on the service once it is operational to make sure it is meeting the needs of our customers and will always welcome public feedback and suggestions for improvements in the future.
8.1.5	Suggest making cycle shuttles accessible for modified cycles and cargo bikes	Accessibility is a key consideration for any new service we introduce. Following the many helpful responses received during our earlier cross-river cycling consultation, we are engaging with our chosen service providers to understand and finalise what modifications can be made to vehicles and stopping locations to improve accessibility for all. An example of the modifications includes provision of cycle

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		storage that can accommodate adapted cycles or a cargo bike.
8.1.6	Concern the cross-river cycle shuttle-bus will be underused/feel it is not needed	<p>It is our ambition to provide a high-quality service that is frequent and attractive so that as many cyclists as possible can benefit from the new river crossing.</p> <p>The proposed service is part of our wider plans to support active travel and usage will be kept under review. We acknowledge that this is a relatively untested service for which it is difficult to forecast cycling numbers, and a directly comparable service does not exist. The feedback we received as part of our cross-river cycling consultation in 2023 enhanced our understanding of the likely demand and we will continue to collect cycling data on routes on either side of the river to inform ongoing monitoring of the new service.</p>
8.1.7	Suggest improvements to DLR	This project is part of the longer-term plan in east London to improve river crossings. Along with Silvertown Tunnel, work to extend the DLR from Gallions Reach to Thamesmead is progressing. A further DLR extension to Belvedere has been considered and would bring further benefits in addition to the Thamesmead extension. Given funding constraints, the extension to Thamesmead must be delivered first; however, it will be designed in such a way as to provide opportunity for a further extension in the future.
8.1.8	Oppose proposed supporting measures as part of the green and fair package (general comment)	To help residents and businesses, and to encourage people to use the new public transport connections, we have proposed this mix of concessions, discounts and exemptions and longer-term plan for neighbouring crossings.
8.1.9	Queries about the green and fair package measures/information should be clearer	See our response to issue 1.5.3 in Section 1 above which addressed this issue.
<b>8.2.</b>	<b>Other suggested improvements</b>	
8.2.1	Suggest bus service/public transport provision needs improving/increasing links for those affected	<p>Ahead of a public consultation in 2023, we consulted with STIG on the proposed opening Silvertown Tunnel bus network following the process outlined in the Silvertown Tunnel <a href="#">Bus Strategy</a>.</p> <p>The opening of the Silvertown Tunnel allows us to introduce an enhanced cross-river bus service in east London. Today, only the single-deck 108 bus crosses the river east of Tower Bridge via the Blackwall Tunnel. The development of the bus network was carried out in accordance with the processes set out in the <a href="#">Bus Strategy</a>, which involved consultation with STIG members on the outline proposals. The bus network was then subject to a public consultation between November 2022 and January 2023. The opening Silvertown and Blackwall Tunnel bus network has been confirmed as 21 zero-emission buses per hour crossing the river at peak times (07:00 – 19:00).</p> <p>The initial bus services include the retention of route 108 (Stratford International station to Lewisham station) via the Blackwall Tunnel; the extension of route 129 (currently Lewisham to North Greenwich and will be extended to Great</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>Eastern Quay via City Airport); and a new route Superloop SL4 (Grove Park to Canary Wharf). All services will use zero emission buses and routes using the Silvertown Tunnel will be double-deck buses.</p> <p>Bus journeys through the Silvertown Tunnel will be further enhanced by the availability of a bus lane through the tunnel in both directions. Buses using the Blackwall Tunnel will have priority access to the tunnel via a bus-only link from Tunnel Avenue for buses to join the A102 Blackwall Tunnel Approach northbound, and a dedicated bus only exit slip to allow access to North Greenwich Bus station for Blackwall Tunnel southbound buses via Millennium Way.</p> <p>We will monitor demand for bus services once the Silvertown Tunnel is open and respond accordingly. This includes considering additional cross-river routes or enhancing services on the opening bus network routes. Key considerations for changes include new developments coming forward in the adjacent Opportunity Areas as well as increases in demand for cross-river travel by bus. We will continue to engage with STIG to monitor and develop plans for further enhancements to the service, should they be required.</p> <p>In addition to these bus improvements, we are also progressing work on other sustainable cross-river travel choices, such as the expansion of Surrey Quays station, and pursuing longer term projects such as DLR to Thamesmead.</p>
8.2.2	Suggest improvements to public transport in terms of new vehicle type (e.g. tram-style/double-decker electric/new Routemasters/zero-emission buses)	<p>Today, because of the limited height of the Blackwall Tunnel, only the single-deck 108 bus can cross the river via the Blackwall Tunnel. The Silvertown Tunnel includes a modern new tunnel that can accommodate double-deck bus services and will further enhance public transport by the provision of a designated bus lane in each direction. The project allows us to increase the number of buses able to cross the river in this area from six to 21 buses an hour in each direction during the busiest times between 07:00 – 19:00 Monday to Friday - all of which will be zero emissions.</p> <p>We will monitor demand for bus services once the Silvertown Tunnel is open and respond accordingly, including considering adding more cross-river routes as well as additional services on existing routes.</p>
8.2.3	Suggest cycling provision needs improving	<p>While developing the Silvertown Tunnel project, prior to submitting the DCO, we considered whether cyclists could use the tunnel, either by sharing the bus lane or via dedicated segregated cycle infrastructure. After careful consideration, we decided that walking and cycling would not be permitted through the Silvertown Tunnel for safety reasons. In addition, providing a segregated lane and larger tunnel would add substantial additional cost and would be unlikely to provide significant benefits as the environment inside the tunnel was unlikely to be attractive to cyclists.</p> <p>As part of the permission granted for the construction of the tunnel, we therefore committed to investigating and delivering an alternative cross-river facility for cyclists.</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>We have ultimately decided to proceed with a bespoke cross-river cycle shuttle-bus service for cyclists to provide the river crossing facility for cyclists. This option allows us to provide a service ready for when the tunnel opens. It also provides us with the greatest flexibility to respond to demand and user preferences as these evolve over time.</p> <p>While a ferry service was not our preferred option given the significant investment required, we recognise there is strong interest in a cross-river ferry service in this area. Therefore we will continue to work with private sector partners including river service operators to further explore proposals for viable ferry services as development comes forward on both sides of the river in this area.</p> <p>Cyclists will also continue to have the option of using the IFS Cloud Cable Car to cross the river as well as the existing foot tunnels.</p>
8.2.4	Concern about the condition of the Rotherhithe Tunnel/suggest it needs improving	At all our river crossings, including the Rotherhithe Tunnel, we continue to carry out work that is essential in the short-term to keep these crossings operational while also planning the work required in the future to ensure they remain open in the long term.
8.2.5	Suggest encouraging more use of active travel (walking/cycling)/buses using the tunnels/restricting car use and prioritising tunnels for active travel (walking/cycling)/buses	<p>After careful consideration, we decided that walking and cycling would not be permitted through the Silvertown Tunnel for safety reasons. However, for cyclists, we will provide a new cross-river cycle shuttle-bus service, creating a safe way for cyclists to cross the river using the Silvertown Tunnel. Our plans have been developed using valuable feedback from the Silvertown Tunnel cross-river cycling consultation where we consulted on our preferred option of a cross-river cycle shuttle-bus and asked customers how they would want the service to operate.</p> <p>The cross-river cycle shuttle-bus will be a high frequency service, where cyclists will be able to turn up and go without consulting a timetable in advance and will be free for at least the first 12 months. Following opening, in the first year of operation, we will track uptake of the services, assess suitability of the timetable and make changes if necessary. As part of the review, we will also assess affordability of making the buses free, discounted or fully charged beyond the opening year.</p> <p>Pedestrians will be able to use the new bus network facilitated by the tunnel opening will see 21 buses per hour in each direction using the tunnel in peak times opening up new cross river travel opportunities. Buses using the Blackwall Tunnel will also have priority access to the tunnel via a bus-only link from Tunnel Avenue for buses to join the A102 Blackwall Tunnel Approach northbound, and a dedicated bus only exit slip to allow access to North Greenwich Bus station for Blackwall Tunnel southbound buses via Millennium Way.</p> <p>The DCO granted to us to construct the Silvertown Tunnel gives specific permissions to build and operate a road tunnel which buses and general traffic can utilise. This means that fundamentally repurposing the tunnel for other means, such</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		as active travel, would be outside of the terms stipulated within the DCO. During the development of the Silvertown Tunnel project, we undertook a number of studies to inform the project design, including how cross-river walking and cycling provision could be improved. We remain committed to enabling a step change in the opportunity for active travel in and around the tunnel.
8.2.6	Suggest building more tunnels/bridges to improve the movement of people/traffic	As per the <a href="#">Mayor's Transport Strategy</a> (Proposal 95, p.243), following the delivery of the Silvertown Tunnel, the Government's Lower Thames Crossing and the DLR extension to Thamesmead, the Mayor will give consideration to the case for further road crossings of the river in east London where certain criteria are met including: where the need cannot be met through the provision of a public transport only crossing; the proposal is consistent with the Mayor's overall vision for a healthy city; the proposal includes appropriate provision for people walking, cycling and public transport services; and there would be no significant adverse air quality impacts at sensitive receptors.
8.2.7	Suggest more support for motorcyclists/should encourage more people to use motorcycles	See our response to issue 1.2.2 in Section 1 above which addressed this issue.
8.2.8	Suggest other restriction/s for who can use Silvertown/Blackwall Tunnel/s	<p>We have considered the most appropriate use of the tunnel and included these findings in our design and development of the proposed user charge.</p> <p>We undertook a number of option studies and public consultations in 2014 and 2015 to inform our decisions which supported the <a href="#">DCO</a> application in 2016. Since then, we have undertaken several other consultations, including this consultation, to inform the final project which will open to the public.</p> <p>Details of previous consultations and options studies can be found on the Silvertown Tunnel webpage.</p>
8.2.9	Suggest reducing public transport fares/encouraging more people to use public transport	<p>We have set out a green and fair package of concessions and discounts of support measures which includes a bus concession providing free trips to encourage use of the new cross-river bus services (routes 108, 129 and Superloop SL4) for local residents. The aim of this concession is to help ensure customers become familiar with new bus services and support new cross-river journeys. Making it easy to use the new routes and services will help to change behaviour so a cross-river journey by bus becomes accessible and attractive from the start for residents. This will help to embed sustainable travel behaviour in the long term. We are also increasing bus services from six buses per hour to 21 buses per hour at peak times.</p> <p>We will also be offering free DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V for one year to support cross-river journeys more broadly across east London.</p>
8.2.10	Suggest walking infrastructure needs improving	As part of our works on the Silvertown Tunnel, we are providing improvements to the walking environments around the new tunnel entrances on each side of the river. These improvements include: a new walking and cycling bridge across the A102 in Greenwich, linking Boord Street with

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		Morden Wharf (replacing a 1960s footbridge), new signal-controlled pedestrian crossings and improved footways at Tidal Basin Roundabout, Tunnel Avenue, and the new realigned Dock Road.
8.2.11	Suggest more restrictions on private car use	<p>One of the objectives of the Silvertown Tunnel is to improve the resilience of the river crossings in east and south-east London. This involves considering how changes to traffic levels at the Silvertown and Blackwall tunnels impact the wider region, which includes the user charge levels for private cars. If we were to set the charges higher for private cars, the benefits of the scheme would not be realised. Drivers would not make the best use of the new infrastructure by increasingly favouring non-charged routes, despite their constraints, resulting in highway network problems and consequential environmental effects.</p> <p>We considered a range of user charge levels to determine which would most effectively contribute to achieving the Project Objectives. Setting the level of the user charges is supported by extensive traffic modelling and environmental assessment work. In setting the proposed user charges (including charge levels for different vehicles, charging hours, discounts and exemptions, and other factors), we have considered a range of factors, including the potential impact on the road network, the environment and the impact on different groups through an Equalities Impact Assessment.</p> <p>Other restrictions on private car use (such as only allowing trips by private vehicles that cannot be completed by public transport, only allowing cleaner vehicles or only allowing those from London to use the crossing) would either be very challenging to implement or prevent the Project Objectives from being met.</p>
8.2.12	Suggest other ways to reduce traffic/congestion	<p>We assessed other ways to reduce traffic/congestion on the Blackwall Tunnel approach and they are set out in the DCO document '<a href="#">Case for the Scheme</a>' which is available on our website. The assessment included a vehicle ferry, third tunnel bore at Blackwall, a lifting bridge, an immersed tube tunnel, a bored tunnel, walking and cycling options, public transport options and user charging. However, constructing the Silvertown Tunnel was found to be the best way to resolve the existing issues at the Blackwall Tunnel.</p> <p>While the Silvertown Tunnel has been constructed, we have also invested at the Blackwall Tunnel in infrastructure to stop over-height vehicles slowing traffic and implemented general network management principles to smooth flow on the approaches and surrounding network.</p>
8.2.13	Suggest other ways to reduce pollution/negative environmental impact	<p>Without the Silvertown Tunnel, congestion and air quality around the Blackwall Tunnel were forecast to get worse as London's population grows. User charges for both tunnels, as well as the new cross-river bus network, will help us manage the environmental impact of traffic. We're committed to ensuring the project delivers an overall improvement in air quality by reducing congestion currently seen at the Blackwall Tunnel.</p> <p>Monitoring of traffic and air quality has been undertaken</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>since 2020 as it is important that we collect pre-opening baseline data. This data and updated modelling work has been used to help set the proposed level for the user charges, plan the new bus network and inform pre-opening highway changes where required. All this work has been shared with the Silvertown Tunnel Implementation Group (STIG).</p> <p>Once the tunnel opens, as well as continuing to monitor traffic and air quality levels for a minimum of three years, we will check for any unforeseen changes in levels of air quality and implement appropriate mitigation options if necessary. We have also committed to the production of annual monitoring reports which will be published on our website and discussed with STIG.</p>
8.2.14	Suggest making improvements to other crossing points/facilities	<p>Following the delivery of the Silvertown Tunnel, the Government's Lower Thames Crossing and the potential DLR extension to Thamesmead, the Mayor will give consideration to the case for further road crossings of the river in east London where certain criteria are met including: where the need cannot be met through the provision of a public transport only crossing; the proposals are consistent with the Mayor's overall vision for a healthy city; the proposals includes appropriate provision for people walking, cycling and using public transport services; and there would be no significant adverse air quality impacts at sensitive receptors.</p> <p>At all of our river crossings, we continue to carry out work that is essential in the short-term to keep them and the wider road network operating, while also planning the work required in the future to ensure they remain open in the long term. This includes the Rotherhithe Tunnel and the Blackwall Tunnel.</p> <p>We do not manage Tower Bridge or the Dartford Crossing so the responsibility for improvements at these crossings sits with City Bridge Foundation and National Highways respectively. We also continue to work with local boroughs and landowners in supporting third-party funded new river piers in east London.</p>
8.2.15	Suggest focusing on addressing other issues/investing resources elsewhere instead of the proposed charges	<p>Introducing user charges on the Silvertown and Blackwall tunnels, once the Silvertown Tunnel opens in spring 2025, has been a core component of the project since its inception in 2012 and was approved by the Secretary of State for Transport in 2018.</p> <p>A key objective of the user charges is to manage demand and ensure the benefits of the project are achieved as well as manage any impacts on local communities and the environment (PO5).</p>
8.2.16	Concern about the administrative costs involved in the proposed charges/how discounts and exemptions will be managed	Administrative costs, including management of discounts and exemptions, will be minimised by sharing systems capability with other road user charging schemes.
8.2.17	Suggest other improvements to road infrastructure	We're determined to make journeys in London safer for everyone, so we're continually making improvements to our roads. At any one time, we're running hundreds of projects



Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>designed to improve living and travelling conditions in London's public spaces.</p> <p>This includes work to create safer, greener and more attractive streets and town centres, and safer conditions for cyclists and pedestrians - part of the Mayor's commitment to the Healthy Streets approach.</p>
8.2.18	Suggest there should be no charges for the Dartford Crossing	<p>The Dartford Crossing is managed by National Highways, and we do not have any control over charge setting or receive any income from this crossing. We work closely with National Highways, and they are represented on the STIG which will remain in place post tunnel opening, for a period of at least three years.</p>
8.2.19	Suggest creating a strategy that considers all crossings/applying a fair and consistent approach across all crossings	<p>Whilst our modelling assessments include all existing east London river crossings, we do not manage all crossings in London or all crossings of the Thames in east London. We are also not the Highway Authority for all crossings in London. Therefore, we are not able to create a strategy which covers all river crossings.</p> <p>However, we do work closely with National Highways (which manages the Dartford Crossing and the proposed Lower Thames Crossing) and other asset managers to manage operational incidents and co-ordinate any required closures to minimise the impact of planned and unplanned works on customers. We have been in regular discussion with National Highways to share information about the traffic impacts of the Silvertown Tunnel on the wider area. National Highways is also a member of STIG and have been closely consulted on our proposals throughout the development and construction of the project.</p> <p>Once the tunnel opens, we will continue to monitor traffic and air quality levels at all east London river crossings (Tower Bridge, Rotherhithe Tunnel, Blackwall Tunnels, Woolwich Ferry and Dartford Crossing) for a minimum of three years and implement appropriate mitigation options if necessary to manage adverse impacts.</p>
8.2.20	Suggest the Silvertown Tunnel is not needed/feel it should not have been built	<p>The Blackwall Tunnel has approximately 700 closures a year on average, with around one million hours wasted each year as a result. If the tunnel is closed for only six minutes, the queue quickly extends to three miles. More significant closures result in widespread congestion across east and south-east London, as there are no suitable alternative river crossings available.</p> <p>There is a lack of highway river crossings in east London compared to west, with only three crossings of the Thames east of Tower Bridge. In particular, the size of Blackwall Tunnel restricts bus service provision to single deck buses only, significantly constraining the opportunity for cross-river trips to be made by bus.</p> <p>We held public consultations on Silvertown Tunnel in 2014 and 2015 to gauge overall support for the need for the tunnel project</p> <p>Our extensive modelling and assessment work has shown that the Silvertown Tunnel will effectively reduce congestion,</p>

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		support sustainable growth, and deliver an overall improvement in air quality. The new modern tunnel will enable faster and more reliable journey times, reduce the impact of traffic congestion on some of London's most polluted roads and provide more opportunities to cross the river by public transport with a network of zero-emission (at the tailpipe) buses offering new routes and better access to more destinations.
8.2.21	Concern about the condition of the Blackwall Tunnel/suggest it needs improving	At all our river crossings, including the Blackwall Tunnel, we continue to carry out work that is essential in the short-term to keep these crossings and the wider road network operating, while also planning the work required in the future to ensure they remain open in the long term.
<b>9. Consultation</b>		
<b>9.1. General comments about consultation</b>		
9.1.1	More information needed on proposals/proposals are not clear (general comment)	<p>When developing consultations, we follow best practice guidelines to ensure our activities are legally compliant, open, and honest.</p> <p>We hold public consultations while our proposals are at a formative stage, and in advance of a final decision being made as to how we may proceed.</p> <p>Through consultation we seek to listen to respondents and to understand the reasons why they may view proposals positively or negatively. The feedback we receive through consultation is used as part of our decision-making process.</p>
9.1.2	Concern consultation responses will have no/little impact on TfL decisions/just a tickbox exercise	As above – combined response.
9.1.3	Comment/reference to other/previous consultations	<p>We consulted on proposals to build the Silvertown Tunnel in 2013, 2014 and a statutory DCO consultation in 2015. The latter included proposals for a Tunnel User Charge outlined in a preliminary charging report. The preliminary charging report stated that in advance of the tunnel opening, we would publish a report on the proposed initial charges with feedback/comments invited from all key stakeholders and the public.</p> <p>The requirement for the tunnel to operate with user charging in place was confirmed as part of the project's DCO, which was approved by the Department for Transport in 2018.</p> <p>Documents for the previous consultations are on our publications page: <a href="https://www.tfl.gov.uk/roadworks/projects/silvertown-tunnel/consultation">Silvertown Tunnel permission - Transport for London (tfl.gov.uk)</a></p>
<b>9.2 Survey questions</b>		
9.2.1	Questions were complicated/unclear/should have been clearer	When developing consultations, we follow best practice guidelines to ensure our activities are legally compliant, open, and honest.

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
		<p>We hold public consultations while our proposals are at a formative stage, and in advance of a final decision being made as to how we may proceed.</p> <p>Through consultation we seek to listen to respondents and to understand the reasons why they may view proposals positively or negatively. The feedback we receive through consultation is used as part of our decision-making process.</p> <p>We designed the consultation survey to understand how the proposals would impact the community and commuters, through a range of closed questions and free text options.</p> <p>In particular, this consultation sought feedback on the proposed charge level and package of discounts and exemptions to apply once the new Silvertown Tunnel opens in spring 2025. We offered unlimited free text options under each subject and received more than 4,000 individual written submissions.</p> <p>We also ask a range of closed questions to better understand the profile of those who have engaged with us, thereby allowing greater insight into consultation findings. Our closed questions sought to better understand the profile and travel habits/intentions of the respondent.</p> <p>This allows our consultations to have a richer database that allows for more insightful findings.</p>
9.2.2	Questions asked were irrelevant	As above – combined response.
9.2.3	Consultation/questions are biased/leading	As above – combined response.
9.2.4	Should ask questions about charging more generally/whether people support or oppose any charge	As above – combined response.
9.2.5	Should be more questions about other specified aspects/topics	As above – combined response.
9.2.6	Response options to questions were limited	As above – combined response.
<b>9.3. Survey design</b>		
9.3.1	Survey was poor quality/design/presentation (general comment)	Our consultation materials, and web page were designed to make clear the proposals being presented to respondents. We are sorry if this was not the case for some respondents and will consider this feedback when preparing future consultations.
9.3.2	Suggest more and better use of maps/ images	As above – combined response.
<b>9.4. Survey accessibility</b>		
9.4.1	Promotion/advertising/awareness of consultation is	We want our consultations to be fully accessible to anyone that wants to take part. We publicised the consultation in a

Consultation Report (Silvertown & Blackwall tunnels user charge)

Ref	Issue raised	Draft response
	poor/low/lacking and should be improved	<p>variety of digital and non-digital ways; this is outlined in Chapter 2 of the Consultation Report.</p> <p>We held 13 on-street promotional engagements during the consultation and these were carefully planned to cover as wide a range of locations, times and weekend/weekday times as possible. We prioritised the boroughs of Greenwich, Newham and Tower Hamlets as these are the areas where the tunnels are located.</p> <p>It is unfortunately not always possible to match everyone's expectations in terms of public engagements. However, our consultation publicity always gives details of how people can contact us by phone, email or via our website if they are unable to attend the available events.</p>
9.4.2	Suggest further consultation/engagement needed	As above – combined response.
9.4.3	Consultation/survey was difficult to find/access (general comment)	As above – combined response.
9.4.4	Disagree with registering before being able to complete the survey/should be able to give views without registering/sharing personal information	<p>Registration is now required to respond online to our consultations to enable us to notify people of the outcome of the project or provide an update and allow us to notify people about other projects that may be of interest to them. It also helps us to ensure that people adhere to our community guidelines, underpinning a safe, constructive environment for everyone using 'Have your say'. This includes optional questions about demographics so that we can understand the extent to which a particular group who may be impacted is responding to our consultation, or is responding with specific concerns we need to address.</p> <p>While registration is required when someone is using the consultation portal to respond through the online questionnaire for the first time, as detailed above, it was also possible for responses to be submitted by email and post. A FREEPOST address was provided, and no postage charges applied. In addition, a telephone line was made available for people to talk to us in person.</p>
9.4.5	Suggest registration/login process should be simplified	As above – combined response.
9.4.6	Criticism of TfL website (general comment)	<p>We want our consultations to be accessible to anyone that wishes to take part. Our aim was to ensure the consultation was accessible to anyone that wanted to take part. Our online web pages use software that meets WCAG 2.1, the current global web content accessibility standard.</p> <p>Visitors to the web page could customise their online experience to suit individual needs. The following accessibility tools were available: page narration, colour project changes, larger font sizes, and translation text into around 100 languages if needed.</p> <p>British Sign Language (BSL) video of the <a href="#">proposals</a> and <a href="#">survey</a> were provided as part of our consultation materials. In addition, we created Audio track versions of the <a href="#">proposals</a> and <a href="#">survey</a>. We offered a BSL conversation service which would allow the TfL consultation lead to have a two-way BSL</p>

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Ref	Issue raised	Draft response
		translated discussion with the BSL user. To help support London's diverse communities, our <a href="#">Have Your Say platform</a> is also able to translate our consultation website materials into many different languages.
9.4.7	Criticism of survey inclusivity (general comment)	As above – combined response.
<b>END</b>		

## Appendix B: Campaigns and petitions

### (i) Friends of the Earth campaign

Campaign template response:

*Dear Transport for London,*

*Please find below my response to the TfL consultation on river crossing charges.*

*Do you have any comments on the proposed charge levels?*

*I am pleased that you are proposing to charge different rates depending on the time of day of journeys. In order to reduce pollution in the areas surrounding the tunnels, I would also like TfL to explore putting different charges in place depending on how polluting a vehicle is. A diesel vehicle or big SUV should face higher charges than more efficient and smaller ones, or clean vehicles.*

*I also want the Mayor to review the use of East London river crossings, and look at how much space is allocated to traffic compared to greener transport – and this could affect toll levels.*

*Do you have any comments on our proposed discounts and exemptions?*

*I fully agree that local people on low-incomes should get a 50% discount as a minimum compared with those on higher incomes and who live further away. I am in favour of the exemptions too, especially to support disabled people and clean vehicles.*

*In addition, I strongly feel that public transport through the tunnels, as well as facilities for cycling, should be free on an ongoing basis and as attractive as possible to help people have a genuine alternative to using their vehicles.*

*However, in order to offer better and direct options for clean travel, and help the Mayor deliver on his climate and air pollution targets, I want him to review the use of East London river crossings. This must include considering repurposing at least some of the lanes in the Silvertown and Blackwall Tunnels as well as nearby river crossings like Rotherhithe Tunnel and Tower Bridge, for active travel and public transport only.*

*[name]*

*[email address]*

*[post code]*

### (ii) We are Possible campaign

Campaign template response:

*Dear Transport for London,*

*I'm writing to respond to your current consultation on user charging for the Silvertown and Blackwall tunnels, coming into effect in 2025.*

*Firstly, I'm opposed to opening new routes for motor traffic in the midst of a climate crisis and toxic air crisis. Increasing road space for motor vehicles only increases traffic and harms the*

## Consultation Report (Silvertown & Blackwall tunnels user charge)

environment and human health - especially the health of the most marginalised Londoners. There shouldn't be any net increase in road space given to motor vehicles in London.

I'm opposed to the opening of Silvertown Tunnel for motor vehicles, and I hope it can be urgently repurposed for public transport and active travel only - like in Possible's visualisations. I urge you to also look at repurposing London's older Victorian bridges, like Hammersmith Bridge and Tower Bridge, for active travel and lightweight public transport only.

If the tunnel goes ahead as a tolled tunnel for motor vehicles, then:

- Please make it fair for residents living in different parts of the city by introducing equal tolls across all London's bridges. It's not fair that East Londoners will pay to cross the river when West Londoners don't.
- Introduce tolls on a 'polluter pays' principle - charge a higher rate for more polluting vehicles.
- Make sure that the cycle shuttles across the bridge are accessible and work for modified cycles and cargo bikes.
- Ensure the highest standards of safety for people walking and cycling on the approach to either end of the tunnel, protecting them from the rise in traffic and particularly HGV traffic.
- Ensure that all buses and all new bus routes going through the tunnel are electric, to avoid the worst air pollution impacts for locals.
- Follow up with a coherent strategy that looks at all bridges and tunnels at once and prioritises active travel and public transport, taking ageing and costly infrastructure into account.

I look forward to hearing the outcome of this consultation.

### (iii) Change.org (Mr Liam Davis)

The petitioners' prayer read as follows:

*Concerns About the Proposed Tolling System:*

1. *Geographic Inequality: The current proposal to toll only the Silvertown and Blackwall Tunnels unfairly burdens residents and businesses in East and Southeast London. These communities already face a lack of adequate river crossings compared to West London, where crossings are more plentiful and currently free to use. This disparity risks exacerbating existing inequalities and may place an undue financial strain on those who rely on these crossings for their daily commutes.*
2. *Risk of Traffic Displacement: Tolling only specific crossings may lead to traffic displacement as drivers seek alternative routes to avoid the tolls. This could increase congestion on untolled bridges and roads, leading to greater pollution and longer travel times in areas not designed to handle such traffic volumes. This outcome would be counterproductive to the goals of reducing congestion and improving air quality.*
3. *Economic Impact: The tolls may disproportionately affect lower-income individuals who rely on the tunnels for work or essential travel. For many, the additional cost may be a significant burden, particularly in the current economic climate. Small businesses, especially those that operate across the river, could also be adversely impacted by the increased costs.*

## Consultation Report (Silvertown & Blackwall tunnels user charge)

4. *Value for money of tolls: Generally, where tolls have been introduced for infrastructure projects elsewhere, it results in an improvement in in end-to-end journey times and thus presents a favourable outcome to toll infrastructure users. However, without significant changes to road infrastructure when motorists exit both Thames tunnels, either north or south of the river, has any analysis been produced to assess projected efficiency of traffic movement and whether journey times will be improved? Or, will bottlenecks simply commence elsewhere in the road network? Without the significant reduction in journey times, users will feel very short-changed for their increased daily commuting expenses.*

*Suggestions for a More Equitable Tolling System:*

*To address these concerns, I propose the following measures:*

1. *Uniform Tolling Across All Thames Crossings: Introduce a consistent tolling system for all road crossings over and under the Thames, including both tunnels and bridges. This would ensure that the financial burden of maintaining and improving London's transport infrastructure is shared more equitably across all users, regardless of their location. It would also prevent the displacement of traffic and reduce the risk of exacerbating congestion in untolled areas. If say, every motorist using a Thames crossing (be that a tunnel or a bridge) in both East and West London were to pay a nominal fee of £1-£2 per day, this would have a lower economic impact for those on low-incomes.*

2. *Income-Based Toll Discounts: Implement a sliding scale for toll charges based on income. This approach would ensure that lower-income individuals are not disproportionately affected by the tolls, while still contributing to the necessary funding for infrastructure projects. Those with higher incomes, who are more able to bear the cost, would pay a higher toll, contributing more to the system.*

3. *Enhanced Public Transport Alternatives: As part of any tolling strategy, there must be a parallel investment in public transportation options, particularly in areas where tolls are being introduced. Improved North East to South East London public transport would offer a viable alternative to car travel, helping to reduce congestion and pollution, and ensuring that the tolling system does not disproportionately affect those with fewer transport options.*

*A Call for Fairness and Transparency:*

*In conclusion, while the need for tolling to fund infrastructure projects like the Silvertown Tunnel is understandable, the current approach risks deepening existing inequalities in London. A more equitable tolling system that applies uniformly across all Thames crossings, with considerations for income and congestion, would better serve the interests of all Londoners. The creation of a universal Thames toll for all Londoners would create a central infrastructure fund, which then could be used to fund restoration and renewal of other bridge projects, such as the Hammersmith Bridge, and any future significant Thames crossing expenditure. I urge you to consider these suggestions and to work towards a solution that is fair, transparent, and inclusive. I believe that with thoughtful planning and consideration, we can achieve a tolling system that balances the need for revenue with the principles of equity and fairness.*

### **(iv) Alex Wilson AM, Reform UK petition**

The petitioners' prayer read as follows:

*The Mayor of London and TfL have confirmed plans to introduce toll charges on both Blackwall and Silvertown Tunnels when the new tunnel opens in 2025.*



*Consultation Report (Silvertown & Blackwall tunnels user charge)*

*We, the undersigned, oppose this tax on London's drivers and call on the Mayor and TfL to scrap the proposed charges.*

**(v) Routemaster Buses Campaign**

For further information on the Routemaster buses campaign see section 5.11.5

## Appendix C: Consultation survey

### TfL consultation survey: Silvertown and Blackwall tunnels user charges

#### Tell us your views

We are holding a eight-week consultation to hear what you think about our proposals.

You can reply by completing our survey, which should take no more than ten minutes. The closing date for comments is Tuesday, 3 September 2024.

To take part in our online survey you will need to register with your email address.

If you prefer, you can also:

Email: TC-yourview@tfl.gov.uk

Telephone: 020 3054 6037 to leave your name and contact number and we will call you back. Please quote 'Tunnel Charges consultation' when leaving your message

Write to: FREEPOST TFL HAVE YOUR SAY (no stamp required)

Please note responses to the survey may be made publicly available after the consultation has closed, this would typically be in the form of a report on the results of the consultation exercise, but any personal information will be kept confidential. Your personal information will be properly safeguarded and processed in accordance with the requirements of privacy and data protection legislation. For further information, please visit our [privacy policy](#).

#### Section (i): About you

To help us understand a bit more about you, please answer the following questions.

1. Can you please confirm if you are responding as an individual or as an official representative of an organisation (e.g. interest group, charity or trade body).

*(Choose one option.)*

- As an individual
- As an official representative of an organisation

2. If you are responding as an official representative of an organisation, then please provide your organisation name below.

[Text box]

3. In which borough do you live? (If you are responding as an official representative of an organisation, please provide your organisation's primary address postcode in Question 4 below.)

*(Choose one option.)*

- Barking and Dagenham
- Barnet
- Bexley
- Brent

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

- Bromley
- Camden
- City of London
- Croydon
- Ealing
- Enfield
- Greenwich
- Hackney
- Hammersmith and Fulham
- Haringey
- Harrow
- Havering
- Hillingdon
- Hounslow
- Islington
- Kensington and Chelsea
- Kingston upon Thames
- Lambeth
- Lewisham
- Merton
- Newham
- Redbridge
- Richmond upon Thames
- Southwark
- Sutton
- Tower Hamlets
- Waltham Forest
- Wandsworth
- Westminster

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

I live outside of London

4. Please confirm your postcode:

[Text box]

5. What encouraged you to complete this questionnaire?

I'm interested in the proposals because...

*(You can choose more than one option.)*

- I'm a resident living close to the tunnels
- I own or run a local business close to the tunnels
- I work at a business close to the tunnels
- I attend a school, college or university close to the tunnels
- I commute to work through the Blackwall Tunnel
- I use the Blackwall Tunnel for business trips
- I use the Blackwall Tunnel as a taxi driver
- I use the Blackwall Tunnel as a Private Hire Vehicle driver
- I use the Blackwall Tunnel as a bus passenger
- I use the Blackwall Tunnel for reasons other than work
- I intend to use the Silvertown Tunnel when it opens
- I'm just interested in the proposals

Section (ii): Your travel habits

To help us understand about how you travel, please answer the following questions.

6. For journeys across the River Thames in east London, what is your usual travel mode:

*(Tick all that apply.)*

- Bus
- Cable Car
- Cycle
- River Bus

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

- Travel by motorcycle
- Travel by taxi or Private Hire Vehicle
- Travel by van
- Travel in a business car
- Travel in a private car
- Underground, Overground or Rail
- Walk
- Woolwich Ferry
- Other
- Not applicable

7. How often do you currently use the Blackwall Tunnel?

*(Choose one option.)*

- Daily
- Weekends only
- 2–3 times a week
- Once a week
- Once a month
- A few times a year
- Never

8. Which of the following statements best reflects your future intentions once the Silvertown Tunnel opens?

*(Choose one option.)*

- I intend to completely switch my journey route from the Blackwall Tunnel to the Silvertown Tunnel
- I intend to partially switch my journey route from the Blackwall Tunnel to the Silvertown Tunnel
- I intend to continue using the Blackwall Tunnel and do not intend to use the Silvertown Tunnel
- I don't intend to use either tunnel after the Silvertown Tunnel opens

9. When the Silvertown Tunnel opens, how often do you intend to use it?

*(Choose one option.)*

## Consultation Report (Silvertown & Blackwall tunnels user charge)

- Daily
- Weekends only
- 2–3 times a week
- Once a week
- Once a month
- A few times a year
- Never

10. The Silvertown and Blackwall tunnels will offer more and improved bus services, including a shuttle bus for cyclists, across the River Thames in east London. Do you intend to use these new public transport options that will be offered?

*(Choose one option.)*

- Yes
- No
- Not applicable

11. Do you have an Auto Pay account with TfL?

**(Auto Pay** is a free to register service that enables you to be billed automatically when you travel through the Silvertown or Blackwall tunnels. If you have an existing Auto Pay account for Congestion Charge or ULEZ charges you do not need to register again.)

- Yes
- No – but I intend to register for a free account
- No – and I don't intend to register for a free account

### Section (iii): Our proposals

When the Silvertown Tunnel opens in 2025, charges will apply on both the new Silvertown Tunnel and the Blackwall Tunnel. This has been part of the plans for the new Silvertown Tunnel since they were first developed in 2012. We are inviting your views on the proposed charge levels and our approach to discounts and exemptions, as set out below.

To support residents and businesses, and encourage people to use new public transport connections, we propose a package of concessions and discounts to make the scheme as green and fair as possible. These include a 50 per cent discount for low-income drivers in 13 east London boroughs and a £1 discount on the off-peak charge for small businesses and charities. Local residents will also benefit from free cross-river bus and DLR travel for at least one year, as well as from a cycle shuttle service. Following the opening of this transformational new crossing, TfL will continue to look at options for additional river crossings in east London, including the potential for a new ferry for pedestrians and cyclists.

Proposal (A): Tunnel user charge levels

## Consultation Report (Silvertown & Blackwall tunnels user charge)

We are introducing a user charge at both the Silvertown and Blackwall tunnels following the opening of the new tunnel in 2025. The below table sets out our proposed charge levels with more detailed information available on our consultation website.

The user charges differ based on:

Time of day and direction of travel

Day of the week

Vehicle type

Payment method - Auto Pay registered or paying via other channels (Pay to Drive, via the Contact Centre or Post)

Whether you qualify for a discount / exemption, for example if you live in east London and are on a low-income

For customers registered for [Auto Pay](#) this would include off-peak / peak time variations dependent on the direction of travel. Customers not registered for Auto Pay would pay the peak rate at all times.

Registering for an Auto Pay account is free and means we'll bill you automatically for any journeys through Silvertown and Blackwall tunnels during charging hours.

Charges would apply between 6am and 10pm every day except Christmas Day and would apply per trip.

*Table 1: Proposed User Charges*

Silvertown and Blackwall User Charges – 6am to 10pm				
Charges paid via Auto Pay				Charges paid via other channels
	Standard charges	off-peak	Peak charges Mon-Fri only <i>Northbound 6am - 10am</i> <i>Southbound 4pm-7pm</i>	At all times
Motorcycle, moped, motor tricycle	£1.50		£2.50	£2.50
Car and small van	£1.50		£4.00	£4.00
Large van	£2.50		£6.50	£6.50
Heavy Goods Vehicles	£5.00		£10.00	£10.00

## Consultation Report (Silvertown & Blackwall tunnels user charge)

Penalty Charge Notice (PCN) for non-payment - £180 (Reduced to £90 if paid within two weeks; maximum one PCN per day)

12. Do you have any comments on the proposed charge levels?

[Text box]

### Proposal (B): Approach to discounts and exemptions

We are also proposing to offer discounts and exemptions, as set out in Table 2, to certain people, vehicle types and journeys.

This includes a proposed 50 per cent discount for eligible residents of east London boroughs on certain low-income benefits which would apply for at least the first three years following the opening of the Silvertown Tunnel and will be subject to review.

The proposed eligible benefits are: Income Support, Income-related Employment & Support Allowance, Income-based Jobseekers Allowance, Universal Credit, Pension Credit, Child Tax Credit, Working Tax Credit, Carer's Allowance and Housing Benefit.

The east London boroughs are Barking & Dagenham, Bexley, Bromley, City of London Corporation, Greenwich, Hackney, Havering, Lewisham, Newham, Redbridge, Southwark, Tower Hamlets and Waltham Forest.

For more information about our proposals, please view our main consultation webpage [add link] which includes more detailed information.

*Table 2: Proposed Discounts, Exemptions and Reimbursements*

Discounts, exemptions and reimbursements	Eligibility Criteria
50 per cent Discount	
East London low-income residents' discount (for a period of at least three years)	To qualify individuals must live within an east London borough [*] and be in receipt of certain benefits [†].
100 per cent Discount	
Recovery and breakdown vehicles	This discount applies to recovery and breakdown vehicles operated by organisations in the European Economic Area that are accredited to BS EN ISO9001:2008 (and in accordance with the specification for applying that standard to the industry).
Vehicles with 9+ seats	This discount applies to vehicles with nine seats or more (vehicles registered with the DVLA as a minibus, bus or coach will automatically receive a discount and will not need to apply for the discount).
Blue Badge holders	This discount applies to individuals who hold a valid Blue Badge in the European Economic Area.  Individuals can register up to two vehicles that would be used to travel through Silvertown or Blackwall tunnels. This could be their own vehicle, or one they travel in.



*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Certain operational vehicles used by the host boroughs [‡]	This discount applies to qualifying organisations that operate vehicles performing essential public services. The eligibility is determined by TfL.
Zero-Emission Capable and Wheelchair Accessible private hire vehicles (PHVs)	This discount applies to <a href="#">PHVs designated as wheelchair-accessible vehicles</a> or zero emission capable as long as they are fulfilling a private hire booking. They must also be actively licensed with London Taxi and Private Hire.
£1 discount business discount on standard off-peak charges	
Business discount (for a period of at least 12 months)	Eligible small businesses, sole traders and charities based in the host boroughs can register a maximum of three vehicles to receive a £1 discount on standard off-peak charges.
<b>Exemptions</b>	
Taxis	This exemption applies to taxis which are actively licensed with London Taxi and Private Hire.
Emergency services vehicles	This exemption applies to emergency service vehicles, including ambulances, police vehicles and fire engines, which have a taxation class of 'ambulance', 'police vehicle' or 'fire engine' on the date of travel.
NHS vehicles exempt from vehicle tax	This exemption applies to NHS vehicles that are exempt from vehicle tax.
Vehicles in the disabled tax class	This exemption applies to vehicles used by disabled people that are exempt from vehicle tax and have a 'disabled' taxation class.
Military vehicles in use	This exemption applies to vehicles currently used by the armed forces including visiting services or international organisations.
<b>Reimbursements [§]</b>	
NHS Patient Reimbursement [¶]	<p>NHS patients are eligible for reimbursement if:</p> <ol style="list-style-type: none"> <li>Clinically assessed as too ill, weak or disabled to travel to an appointment on public transport, and any of following apply: <ul style="list-style-type: none"> <li>Have a compromised immune system (problems with your immune system)</li> <li>Require regular therapy or assessment</li> <li>Require recurrent surgical intervention</li> </ul> </li> </ol> <p>OR</p> <ol style="list-style-type: none"> <li>During an epidemic or pandemic prevalent in Greater London, are clinically assessed as being too vulnerable to infection to travel to an appointment on public transport.</li> </ol>
NHS Staff Reimbursement	NHS staff members, are eligible for reimbursement if any of the following criteria is met:

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

	<p>1. Those using their vehicles to carry any of the following:</p> <p>Bulky, heavy or fragile equipment/supplies</p> <p>Patients' notes or other confidential material</p> <p>Controlled drugs</p> <p>Clinical waste, contaminated sharps, radioactive materials or non-medicinal poisons</p> <p>Prescription-only medicines or waste medicinal products</p> <p>Clinical specimens, body fluids, tissues or organs</p> <p>OR</p> <p>2. Those responding to an emergency when on call.</p>
<p><i>* London Borough (LB) Barking &amp; Dagenham, LB Bexley, LB Bromley, City of London Corporation, Royal Borough (RB) Greenwich, LB Hackney, LB Havering, LB Lewisham, LB Newham, LB Redbridge, LB Southwark, LB Tower Hamlets, LB Waltham Forest</i></p>	
<p><i>† Carer's Allowance, Child Tax Credit, Housing Benefit, Income-related Employment &amp; Support Allowance, Income-based Jobseekers Allowance, Income Support, Universal Credit, State Pension Credit, Working Tax Credit</i></p>	
<p><i>‡ LB Newham, LB Tower Hamlets and RB Greenwich</i></p>	
<p><i>§ Before making a claim for reimbursement, the user charge must be paid on or before the day of your journey, or the vehicle used for the journey must be registered for a TfL Auto Pay account.</i></p>	
<p><i>¶ The NHS trust or hospital must be registered with TfL for the reimbursement scheme. Any refund request should be made through the NHS trust or hospital as they manage the reimbursement process, not TfL.</i></p>	

Discounts require annual renewals (with provision of relevant proofs or registration fees) except Blue Badge holders who granted their discount in line with the expiry of their badge (up to three years from point of issue).

13. Do you have any comments on our proposed discounts and exemptions?

*[Text box]*

Section (iv): About the consultation

14. How did you hear about the consultation? Please select the main way you heard:

- Poster
- Leaflet
- Letter from TfL
- Email from TfL
- Public drop in session

## Consultation Report (Silvertown & Blackwall tunnels user charge)

- Social media
- Saw it on the TfL website
- Read about it in the press
- Other (please specify)

[Text box]

15. Having just completed this consultation, which of the following statements best reflects your experience of accessing the consultation information and sharing your feedback with us.

- Exceeded my expectations: It was very easy to find the information I needed, and it was very easy to respond.
- Met my expectations: I was able to find the information I needed, and it was straightforward to respond.
- Partially met my expectations: I struggled to find some of the information I needed, and I found it difficult to respond.
- Did not meet my expectations: I couldn't find the information I needed, and it was very difficult to respond.

16. If we didn't meet your expectations, please tell us how you would like us to improve our consultation service in the future.

Please only share your feedback on how we can improve our consultation service here. If you want to leave further feedback on the proposals that we're consulting on, then please return to Section (iii) above and leave your feedback there.

[Text box]

17. It's always good to talk and we're always keen to discuss how we'll improve our consultation service going forward. If you'd be interested in taking part in helping to shape our consultation service in the future, by taking part in quick polls, webinars, surveys or focus groups, then select one or more of the options below:

- Yes – I'd like to take part in online surveys or quick polls
- Yes – I'd like to take part in focus groups or webinars
- No – I'm not interested in taking part in this research

## Appendix D: Consultation marketing

### A3 poster

**Your river crossings.  
Your say.**  
Silvertown and Blackwall tunnels  
user charge consultation.

We are building a new tunnel under the River Thames, linking Silvertown to the Greenwich Peninsula. The new crossing will reduce congestion and deliver faster, more reliable journeys in East London. It opens in 2025.

To help balance the flow of traffic, and to repay the cost of the new tunnel, charges are being introduced across both the Silvertown and Blackwall tunnels. Ahead of the new tunnel opening, we want to hear your views on the charge levels and discounts and exemptions that we propose for both tunnels.

For more information and to have your say, please scan the QR code or:  
Visit: [tfl.gov.uk/TC-yourview](https://tfl.gov.uk/TC-yourview)  
Email: [TC-yourview@tfl.gov.uk](mailto:TC-yourview@tfl.gov.uk)  
Telephone: 020 3054 6037 (call back service)  
Write to: Freepost TfL Have Your Say  
Consultation ends Tuesday 3 September 2024.

MAYOR OF LONDON  
TRANSPORT FOR LONDON  
EVERY JOURNEY MATTERS

### A5 leaflet

**Your river crossings.  
Your say.**  
Silvertown and Blackwall tunnels  
user charge consultation.

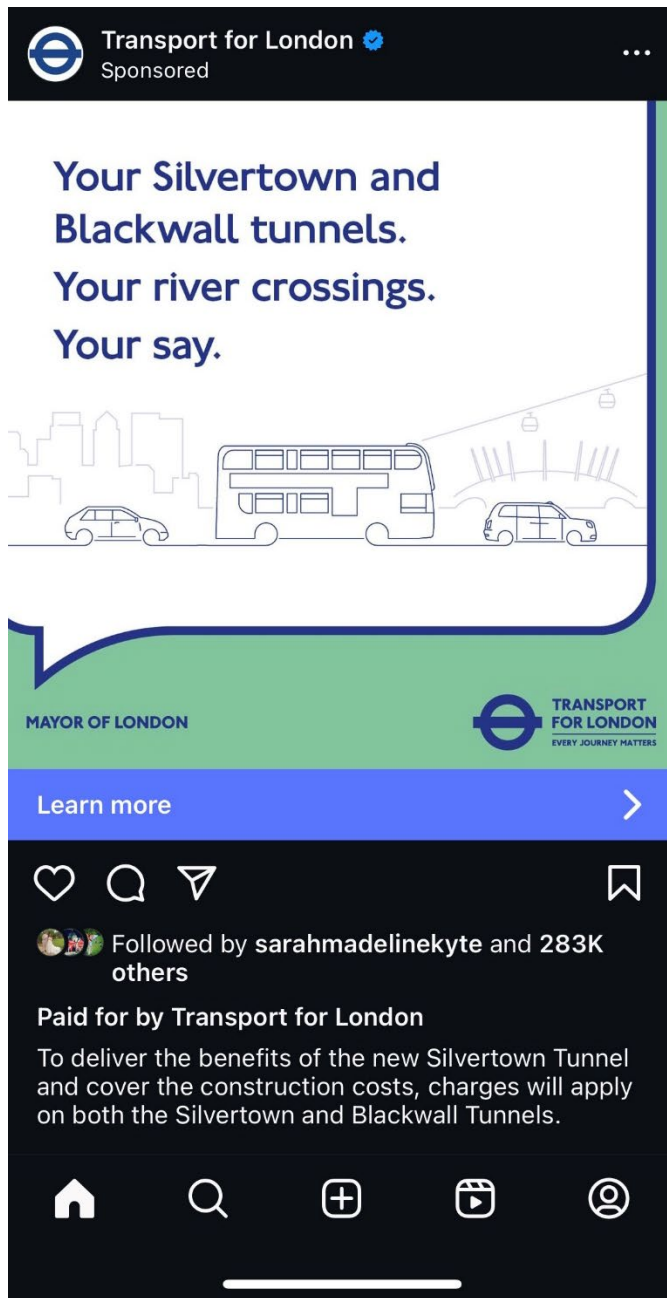
We are building a new tunnel under the River Thames, linking Silvertown to the Greenwich Peninsula. The new crossing will reduce congestion and deliver faster, more reliable journeys in East London. It opens in 2025.

To help balance the flow of traffic, and to repay the cost of the new tunnel, charges are being introduced across both the Silvertown and Blackwall tunnels. Ahead of the new tunnel opening, we want to hear your views on the charge levels and discounts and exemptions that we propose for both tunnels.

For more information and to have your say, please scan the QR code or:  
Visit: [tfl.gov.uk/TC-yourview](https://tfl.gov.uk/TC-yourview)  
Email: [TC-yourview@tfl.gov.uk](mailto:TC-yourview@tfl.gov.uk)  
Telephone: 020 3054 6037 (call back service)  
Write to: Freepost TfL Have Your Say  
Consultation ends  
Tuesday 3 September 2024.

MAYOR OF LONDON  
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Social media assets



Media coverage (links)

**BBC London** - Toll consultation for Blackwall and Silvertown tunnels :  
<https://www.bbc.co.uk/news/articles/cn05y135947o>

**Press Association** - Drivers to be charged up to £4 to use two east London tunnels under TfL plan:  
<https://www.msn.com/en-ie/news/uknews/drivers-to-be-charged-up-to-4-to-use-two-east-london-tunnels-under-tfl-plan/ar-BB1pIXZ9>

**Guardian** - Blackwall and Silvertown tunnels will cost up to £4 at peak times, says TfL: <https://www.theguardian.com/uk-news/article/2024/jul/10/blackwall-and-silvertown-tunnels-will-cost-up-to-4-at-peak-times-says-tfl>

**GB News** - <https://www.gbnews.com/lifestyle/cars/sadiq-khan-daily-charges-london-tunnels-plans>

**Kent Messenger** - <https://www.kentonline.co.uk/kent/news/kent-drivers-could-be-charged-up-to-4-to-use-tunnels-309571/>

**Fleet News** - <https://www.fleetnews.co.uk/news/tfl-sets-out-charges-for-using-blackwall-and-new-silvertown-tunnels>

**Time Out** - [Blackwall and Silvertown Tunnels: Prices for new toll have been revealed](#)

**Harrow Times** - [Drivers to pay toll for Blackwall and Silvertown tunnels](#)

**Times Series** - [Drivers to pay toll for Blackwall and Silvertown tunnels](#)

**This is Local London** - [Drivers to pay toll for Blackwall and Silvertown tunnels](#)

**News Shopper** - [Drivers to pay toll for Blackwall and Silvertown tunnels](#)

**Surrey Comet** - [Drivers to pay toll for Blackwall and Silvertown tunnels](#)

**Enfield Independent** - [Drivers to pay toll for Blackwall and Silvertown tunnels](#)

**Richmond & Twickenham Times** - [Drivers to pay toll for Blackwall and Silvertown tunnels](#)

**Your Local Guardian** - [Drivers to pay toll for Blackwall and Silvertown tunnels](#)

**Guardian Series** - [Drivers to pay toll for Blackwall and Silvertown tunnels](#)

**Kent Online** - [Blackwall and Silvertown Tunnels to have £4 toll fee at peak times for drivers into London new TFL consultation says](#)

## **Appendix E: Summary of Stakeholder replies**

This section provides summaries of the feedback we received from stakeholders. We sometimes have to condense detailed responses into brief summaries. The full stakeholder responses are always used for analysis purposes. Summaries of responses received from members of the Silvertown Tunnel Implementation Group can be found in Chapter 4.

### **Other local authorities & statutory bodies**

#### Essex County Council

The Council commented on the traffic modelling, noting the potential impacts on the Dartford Crossing and the forecasted impact on strategic routes along the Thames, including the A2, A200, A207, A206, A13 and A12. Given these impacts, the Council stated that it does not expect significant impact on Essex residents or businesses.

The Council also commented that the proposed levels of charging at the two tunnels meets its expectations that the charges would not encourage rerouting of traffic to or from the Dartford Crossing.

#### Kent County Council

Kent County Council explained that many residents of the county rely on the Blackwall Tunnel as an essential part of their daily commutes. Whilst it supports TfL's wider ambitions, it stated its concerns with the proposed charge levels and the impact of the charges on traffic flows across the River Thames, Dartford Crossing and Kent road network, and the financial impact on Kent residents and businesses.

The stakeholder noted that there would be approximately a one per cent increase on two-way traffic for the Dartford Crossing, however questioned this number. If attributed to higher charges at the Silvertown and Blackwall Tunnels, this would have a significant negative impact on existing congestion at the Dartford Crossing at peak times. The stakeholder noted that the road network is already constrained and asked for further modelling data showing the impact of the proposed changes at peak times, as well as a scenario where the Lower Thames Crossing has been constructed.

The Council stated its concern with the financial impact that the proposed charges would have on residents and businesses in Kent. It noted that the charges would place an additional financial burden on individuals and businesses that rely on the route, and that the charges would disproportionately affect the Kent economy and the wellbeing of communities. The stakeholder broadly supports the proposed discounts and exemptions but noted disappointment that Kent residents and businesses would not be eligible for user discounts. The Council is further concerned that local Kent businesses would be priced out of serving areas north of the River Thames. It adds that this is particularly difficult following the implementation of ULEZ and Kent residents and businesses being unable to access scrappage or exemptions.

The stakeholder raised a concern around the potential for future price increases at Blackwall, Silvertown and Dartford Crossings and urged TfL to work with National Highways to set out clear procedures and limitations.

### London Borough of Havering

The Council suggested that the charging regime for Silvertown and Blackwall tunnels must be consistent with other crossings across the River Thames, including the proposed Lower Thames Crossing and Dartford Crossing. It urged TfL to work with National Highways and Kent County Council to ensure consistency. The Council also welcomed the proposal for low-income residents in east London boroughs to receive a 50 per cent discount on the charges for a period of three years.

### Port of London Authority

The Port of London Authority requested an exemption to the charge on the basis that it would be necessary for their vehicles to use the tunnel in order to meet their statutory operational duties.

## **Government departments, parliamentary bodies & politicians**

### Bexley Labour Group

The Group recognised that the charging proposals would impact Bexley residents travelling for work and leisure, noting that the proposal for charging for both Silvertown and Blackwall tunnels was confirmed by the Secretary of State in 2018.

The Group suggested that peak charges for residents should be reduced. It welcomed the initial 50 per cent residents discount for Bexley residents but argued for this to be extended beyond the initial three years proposed. It suggested that there should be a £1 discount on the standard off-peak charge for small businesses and charities and suggested that the £1 discount should be extended to boroughs beyond just the host boroughs.

Regarding exemptions, the Group supported the decision not to charge taxis, Blue Badge holders, zero-emission capable and wheelchair accessible private hire vehicles and DVLA registered minibuses, buses and coach. It also stated its support for certain NHS patients who cannot use public transport. The Group suggested that Bexley residents should benefit from the DLR discount on specific routes, and that the cross-river cycle shuttle bus should be provided for more than 12 months.

### Caroline Russell AM

Caroline Russell AM suggested that the proposed charges for both Silvertown and Blackwall tunnels will not be effective in meeting the Mayor's Transport Strategy targets and 2030 net-zero ambitions. However, she stated that the City Hall Greens welcome that a form of user charge is being implemented and that the proposed charges reflect different vehicle type and times of day.

The Assembly Member suggested that there is a risk that discounts and exemptions applied locally are being used as an alternative to fixing issue with public transport and walking and cycling connectivity in east and southeast London. The stakeholder welcomed the 50 per cent discount for local low-income Londoners discount but noted that it should not make it cheaper to drive through the tunnel than to use public transport. The stakeholder stated that the categories eligible for 100 per cent discounts is sensible but raised concern around Blue Badge holders and vehicles used by badge holders or those who support them, suggesting that there needs to be a flexible proposal to accommodate these needs. She also suggested that there should be more thought about the potential adverse impacts of the £1 business discount on standard off-peak charges, and how it may impact the development of some local



businesses. The stakeholder noted the systems for customers to apply for discounts and exemptions need to be easy and simple to use.

The stakeholder commented on the public transport and active travel proposals alongside the Silvertown Tunnel, including the cross-river cycle shuttle bus, bus services and free DLR cross-river journeys. The Assembly Member also suggested that there should be further public engagement on the Silvertown Tunnel and its impacts.

#### City Hall Conservatives

The group opposed the proposed charges for the Blackwall Tunnel, stating that it is unreasonable to charge Londoners to use existing infrastructure. It suggested that the charging structure for both Silvertown and Blackwall tunnels should be based on the Dartford Crossing, suggesting that there should also be a residents' discount in the six neighbouring boroughs at the same level as residents receive for the Dartford Crossing.

The stakeholder suggested that the Mayor should confirm that the charges introduced would be discontinued as soon as the costs of building the Silvertown Tunnel has been reached, adding that it should not be an ongoing charge.

#### Cllr Ann-Marie Cousins (Royal Borough of Greenwich - Cabinet Member for Equality, Culture and Communities)

The councillor stated their concern that the proposals will negatively impact working, less affluent constituents who are struggling with the cost of living. Acknowledging the charges appear to consider some people on low-incomes, the stakeholder noted that the proposals do not account for working people who are not entitled to means tested benefits and currently use the Blackwall Tunnel free of charge.

The councillor suggested that it is unlikely that employers will absorb the additional daily charges per employee. They suggested that this could have the unintended consequence of people losing or choosing to leave their jobs, due to increased living costs. The councillor noted that some residents are dependent on their vehicles and will be restricted or face longer journeys.

#### Cllr Rowshan Hannan, East Greenwich ward councillor

The councillor stated that the Silvertown Tunnel should be restricted to electric vehicles only, as this would address residents' concerns about carbon emissions and traffic increasing. The councillor suggested that there should be a meaningful discount for electric vehicles, not just PHVs.

#### Daniel Francis MP, Bexleyheath and Crayford

The MP accepted that charges would be introduced and welcomed the decision not to charge at any time for taxis, Blue Badge holders, zero-emission capable and wheelchair accessible PHVs and DVLA-registered minibuses, buses and coaches. Mr Francis also welcomed the proposals to reimburse specific NHS patients and the 50 per cent discount for low-income residents in Bexley, however this should be extended beyond three years.

The MP suggested that the £1 discount for small businesses, sole traders and charities during off-peak hours should be extended to all east London boroughs. He also stated that peak times charges for residents in Bexley should be reduced below the proposal within the consultation.

The MP also commented on the cross-river cycle shuttle-bus service and suggested that further detail be provided on the free DLR journeys between Cutty Sark and Island Gardens and between Woolwich Arsenal and King George V.

Gareth Bacon MP, Orpington

The MP opposed the proposals, suggesting that the Mayor has not been clear as to why a charge is being introduced, and criticising the proposal to charge for the Blackwall Tunnel. He suggested that the proposed charging scale indicates that it is a cash raising exercise and that the proposals will place an extra financial burden on motorists, including in Orpington.

The MP stated that the 50 per cent discount for a period of three years is not good enough, and that the proposals underscore the unequal treatment between east and west London, noting that no other river crossings have charges. He suggested that all residents living in boroughs of the eastern side of the River Thames, including those in outer London such as Bromley, should receive a full and permanent residents' discount.

Green Group at LB Newham

The Group emphasised their opposition to the principle of the Silvertown Tunnel, suggesting that more sustainable alternative options to the tunnel exist. The Group criticised the public transport and active travel proposals that accompany the new tunnel, and suggested that proposed user charges at Silvertown and Blackwall tunnels would add congestion to London. The Group urged the Mayor to introduce user charges elsewhere in London and endorsed the response to the consultation from Caroline Russell AM.

The stakeholder emphasised the need for ongoing reviews of the project, including of the risks it poses to active travel modes. It emphasised that the Silvertown Tunnel should be repurposed away from car use.

Greenwich Conservative Council Group

The Group stated the importance of traffic management in Greenwich to control the negative consequences of the tunnel's construction and therefore did not oppose the principle of charging for both tunnels.

The stakeholder suggested that the proposed discounts do not go far enough for low-income households and small businesses. It also suggested that TfL introduces a complete local exemption from charges for both tunnels for residents and small businesses in Greenwich and other affected boroughs. Additionally, it raised concerns around the three-year period for discounts and exemptions and stated that there should not be a time limit.

The stakeholder suggested that the £1 discount on off-peak charges for small business owners is insufficient and would not support small businesses. It urged TfL to model the impact of a full local exemption for residents and small businesses and publish the analysis. The group also asked that TfL reconsider charging electric vehicles less. It also noted disappointment in alternative public transport options in Greenwich to support the Silvertown Tunnel.

Jim Dickson MP, Dartford

The MP welcomed the package of concessions but noted that the charges might add to the cost of living and have a negative impact on low-income residents on either side of the river. He stated concern that the concessions, including the 50 per cent discount for low-income drivers and the £1 discount for small businesses and charities, are limited to London residents

and businesses. The MP argued that Dartford residents and businesses should be granted the same concessions, or alternatively an additional tier of discounts for those otherwise meeting the qualifying criteria but living outside the immediate area.

The MP suggested there should be a 25 – 50 per cent discount for qualifying low-income vehicles of residents living in Kent near the border with London and a 50p - £1 discount on the standard off-peak charge for small businesses and charities in Kent near the border. The MP also asked for confirmation that the 100 per cent discount for Blue Badge holders and Wheelchair accessible PHVs applies equally to non-London households, and confirmation that the exemption applies to all vehicles in the disabled tax class irrespective of geography.

#### London Assembly Labour Group

The Labour Group stated that the communications on the tunnel charges has not been clear enough, despite the plans for the Silvertown Tunnel being in the public domain since 2009. The Group acknowledged the challenges of collecting data of drivers who currently use the Blackwall Tunnel, but requested that TfL provide the Labour Group with examples of the consultation publicity and promotion to understand how relevant Londoners have been informed of the consultation. Additionally, the Group stated its disappointment that the consultation was launched over the summer period.

The Labour Group also criticised the level of detail in the consultation documents, suggesting that there should have been more information on the context and parameters of the user charges. The Group also raised that constituents have described the consultation as unclear and the format of the documentation too complex and inaccessible.

The Group stated its support for the proposed exemptions. However, the Group suggested that TfL must engage with businesses on the business discount, stating that the £1 small business discount on standard off-peak charges for only 12 months for host boroughs is not sufficient and should be reviewed. Additionally, it suggested that there is not sufficient detail in the consultation on the eligibility criteria.

The Group also stated its concern that people whose work or business requires them to cross the river in a vehicle have not been adequately taken into account. It suggests that there is insufficient data on journey purpose, suggesting that it would have been beneficial for TfL to have conducted research into why, how and who crosses the river ahead of the consultation. It suggested that this research would enable effective targeting of discounts and exemptions.

The Labour Group stated its preference to see TfL support PHVs that are not yet zero-emission to become zero-emission capable before the implementation of the user charges.

#### London Assembly Liberal Democrat Group

The Group noted its concerns with the Silvertown Tunnel as a whole and the potential impacts on congestion and emissions, as well as additional comments on the need for investment in active travel and public transport infrastructure.

Whilst the stakeholder appreciated the inclusion of discounts for low-income residents and exemptions for certain vehicle categories, it stated concern that the overall impact of the proposed charges may still disproportionately affect vulnerable groups and not fully offset the financial burden for Londoners. The Group suggested that TfL should assess whether the proposed discounts are sufficient or whether additional support mechanisms, such as increased public transport subsidies or expanded exemptions might be necessary.

The stakeholder raised concerns that the proposals would impact small businesses, sole traders and charities in London. It stated that even with discounts, the additional costs could strain the financial viability of these enterprises. The Group asked TfL to consider more substantial and long-term support for small businesses.

The Group noted that the Mayor's ability to increase or decrease the charges is a crucial tool in managing traffic flow, and therefore stated its concern over the balance between revenue generation and environmental sustainability. It called for a commitment from the Mayor that no action will be taken over the course of his administration with the intention of increasing road traffic through the tunnels. The Group also commented on the free cross-river cycle shuttle-bus service, stating that a year is an insufficient amount of time to offer the service.

Louie French MP, Old Bexley and Sidcup

The MP noted that 6,062 people had signed his petition opposing the proposed charges – this petition was not formally submitted to TfL and therefore we have not included it in this report.

The MP stated his opposition to charging the Blackwall Tunnel, noting this charge would be an additional burden on families, commuters and small businesses. The stakeholder commented that charging for crossings in east London and not west is unfair, and referenced additional road user charges as additional costs that motorists and businesses have to pay daily.

The MP stated that the proposals would hit low-income Londoners in east London hardest, as well as small businesses. He referenced that the proposed discounts for small businesses and charities excludes Bexley and that the low-income discount only applies to people who receive particular benefits, therefore suggested that the concessions do not help people in Bexley who are reliant on the Blackwall Tunnel.

The MP commented that the proposed charges are expensive compared to the Dartford Crossing charge and suggested that the proposals would have consequences on traffic flows to Rotherhithe Tunnel. He commented that congestion could be displaced to other areas of London and reduce the policy's economic impact.

Matthew Pennycock MP, Greenwich and Woolwich

The MP stated broad support for the proposed charges on both tunnels, however noted that the charging structure must ensure parity between sustainable modes of transport and cars. He voiced concern that the proposed off-peak charge for cars, vans and motorcycles is lower than a bus fare and therefore suggested that the off-peak charge is increased to ensure encouragement of mode shift.

The stakeholder suggested that the HGV charges should be sufficiently higher to deter an increase in these vehicles and support ongoing modal shift of freight to river and rail. He agreed with the £10 peak charge, but opposed the £5 off-peak charge, noting that this is cheaper than the Dartford Crossing charge for HGVs. He advocated for a higher off-peak charge for HGVs, and asked TfL to monitor the impact of Silvertown Tunnel on Woolwich Ferry freight trips.

The MP stated support for the Blue Badge, NHS, emergency vehicles, zero-emission capable and wheelchair accessible PHVs exemptions. However, he noted concern with the local discount for residents and businesses, questioning whether this will be compatible with effective traffic management. He asked for greater clarity as to how long the discounts would apply.

Thomas Turrell AM, Bexley and Bromley

The Assembly Member stated that the charges should be aligned with the Dartford Crossing charges, even for those without an Auto Pay account. He suggested that having a disparity in charges risk increasing congestion on Bexley and Bromley roads if motorists choose to divert to the cheaper Dartford Crossing.

The stakeholder stated that there should be a more sufficient discount proposal for residents and local businesses. He noted residents and businesses east of Tower Bridge already have fewer crossing options and would now be subject to charges. He suggested that congestion may be displaced through Greenwich and Lewisham and greater traffic through the Rotherhithe Tunnel and Woolwich Ferry, which would not cope with increased demand. He suggested this could be mitigated through a more generous exemption proposal, which benefits a greater number of local boroughs. He noted the exemptions offered to residents of Dartford and Thurrock as a comparison.

**Transport and road user groups**

Association of London Motorists

The Association of London Motorists opposed charges for both Silvertown and Blackwall tunnels. The stakeholder stated that, if there is a charge to pay for the Silvertown Tunnel construction costs, there should not be a charge for the Blackwall Tunnel.

The stakeholder suggested that drivers will opt to use other river crossings and questioned whether there would be charges instated for all river crossings in London if this is the case. It suggested that displaced traffic will lead to further congestion and pressure on infrastructure.

The stakeholder raised potential repairs needed to the Rotherhithe Tunnel, noting that this could potentially remove the Rotherhithe Tunnel as an option for motorists, which would further limit options for motorists to cross the river.

It suggested that the proposed charges are counterintuitive to the ULEZ and Congestion Charge, as displaced traffic will worsen congestion and concentrate it in specific areas of London. The stakeholder also noted that the proposed travel concessions offered when Silvertown Tunnel opens are currently proposed for 'at least one year', therefore the organisation questioned the legitimacy of the support for residents and motorists.

British Motorcyclists Federation and the National Motorcyclists Council

The two organisations strongly opposed charging motorcycles to use both Silvertown and Blackwall tunnels. The stakeholders suggested that there is insufficient modelling or analysis to demonstrate motorcycle impacts on pollution or congestion. They stated that the proposals do not account for the recognised benefits of motorcycle use, or the impact of the proposed charges on motorcyclist safety and the impact on wider communities around the tunnels.

The stakeholders criticised the decision to equate motorcycles with cars with the same proposed charge and suggested that this will disincentivise motorcyclists to choose motorcycles, which are less-polluting, over cars when using the tunnels. They stated that the proposals contradict the project aims to encourage use of less-polluting vehicles. The stakeholders also stated that the proposals contradict TfL's duty under the Traffic Management Act 2004 and Policy 5 of the Mayor's Transport Strategy, suggesting the proposals would impede TfL's ability to manage the road network effectively and encourage modal shift away from cars.

The two organisations suggested that the proposals would adversely affect modal shift and stated that there is insufficient modelling regarding the effect of the charges on motorcyclists, pedestrians, other road users and local communities. They suggested that the proposals would increase congestion levels and adversely affect communities around the tunnels, especially if motorcyclists choose to use longer routes in and out of London to avoid charges.

The stakeholders raised that historic and heritage motorcycles should be exempt from the charges. They also included comments on the access to the "Bus Lane" in the Silvertown Tunnel.

#### British Vehicle Rental and Leasing Association (BVRLA)

The BVRLA suggested that the exemption for zero-emission private hire vehicles should be extended to car club and rental vehicles. It also suggested that there should be an exemption for electric commercial vehicles that deliver essential goods and services into London and are critical to supporting local businesses growth. The stakeholder stated that TfL should support people and businesses to transition to zero-emission and electric vehicles by retaining the current zero-emission congestion charge vehicles and applying this to Silvertown and Blackwall tunnels.

The BVRLA welcomed the use of Auto Pay and suggested that there needs to be a simple process that enables BVRLA members to make changes for vehicles registered to them, noting the logistical challenges of rental and car club vehicles.

Regarding management of PCNs, the BVRLA suggested that TfL should allow electronic bulk transfer of liability, allow payment for date and time of travel so that the right customers get charged, and provide clear signage that helps drivers prevent getting fined. The BVRLA also suggested that TfL needs to change its current practice of holding details when provided by a rental or leasing company when transferring liability for a PCN.

#### Bromley Cyclists

The cycling group raised concerns that the Silvertown Tunnel will not ease congestion or address the climate crisis and will instead induce traffic. It opposed the charging proposals, stating there are no charges for river crossings in central and east London and noting that people in east and southeast London would be penalised. Additionally, they suggested that the commitment to provide free crossings for a year would not do enough to support or promote environmentally friendly transport.

#### Confederation of Passenger Transport UK

The Confederation of passenger Transport (UK) stated that it is essential for Public Service Vehicles, including buses and coaches, to be exempt from all charges for both tunnels if congestion and emissions are to be reduced. It also suggested that recovery vehicles should be exempt.

#### Freedom for Drivers Foundation

The Freedom for Drivers Foundation stated that it is important to have the 100 per cent discount for Blue Badge holders.

#### Future Transport London

Future Transport London opposed the promotion of "unnecessary use" of private motorised road vehicles, which it stated the Silvertown Tunnel is designed for. It opposed its construction

and stated that congestion could have been reduced with user charges for the Blackwall Tunnel without the need for the Silvertown Tunnel to be constructed. The organisation stated that the Silvertown Tunnel should be repurposed in favour of active travel and public transport.

They support private vehicles being charged to use the tunnels and noted that the charges would help to keep the tunnels and roads north and south of the river uncongested. It supported the proposed peak charging but noted that smart user charging would be better. However, also stated that the charges may displace congestion to Tower Bridge, Rotherhithe Tunnel and the Woolwich Ferry. It suggested that crossings within the Congestion Charging zone should also be subject to user charges during Congestion Charge hours, to discourage displaced congestion.

They stated a preference for larger private vehicles and models to pay more than smaller vehicles and welcomed that some cross-river journeys by bus and DLR will be free for the first year, noting potential modal shift benefits.

#### London Cycling Campaign (LCC)

London Cycling Campaign opposed the Silvertown Tunnel and suggested that it should be used for public transport and active travel only. They suggested that the new tunnel will induce demand and increase traffic congestion, despite the introduction of charges. LCC argued that TfL needs to set charges and adjust them if needed to restrain demand effectively in order to achieve the Mayor's Transport Strategy objectives.

The stakeholder stated that the list of exemptions is "extensive" and the relatively low cost of the charges would result in increased motor traffic across the local area. It suggested that TfL should increase the charges for the tunnels and monitor other river crossings for evidence of increased usage. It stated that TfL should also consider introducing charges for Rotherhithe Tunnel and Tower Bridge to minimise traffic displacement.

LCC stated that TfL should be actively working to enable people, freight, public transport, active travel and necessary private motor traffic to cross the River Thames in a manner that enables London to keep moving and enable the Mayor's Transport Strategy and net zero targets to be achieved. The stakeholder also commented on the cross-river cycle shuttle-bus and the DLR cycle carriage. LCC suggested that more should be done to consider road safety regarding HGV and heavy vehicle traffic, and separate the flow of motor and cycling traffic on both sides of the river to enable key cycling corridors and mitigate against road danger.

#### London TravelWatch

London TravelWatch called for TfL to clearly set out the rationale for the charge. The stakeholder called for measures to ensure that low-income Londoners are not disproportionately impacted by the charge. It noted that the Auto Pay function is not available to the digitally excluded.

The stakeholder made a range of suggestions for mitigations to reduce negative impacts, including new public transport river crossing options and new active travel options such as a free cross-river cycle shuttle-bus. It welcomed proposals for discounts but noted that they are time limited, and called for these discounts to be reviewed, particularly from the point of view of vulnerable people. The stakeholder also called for discounts and exemptions for a wider group of disabled people.

The stakeholder called for a comprehensive engagement and communications plan to ensure users are aware when the charge would apply and what processes would follow if users received a penalty for failing to pay.

### Motorcycle Action Group

Motorcycle Action Group opposed the charges for motorcycles on the basis that they are disproportionate and contrary to the aims of the Silvertown Tunnel and other TfL and Mayoral policies. The stakeholder called for motorcycles to be exempt from charging and to be permitted access to the Silvertown Tunnel bus lane. The stakeholder noted its own modelling work which showed that an exemption to the charge for motorcycles would better meet the objectives of the project. The stakeholder also made the case for an exemption to charging for motorcycles from a road safety perspective.

### Newham Cyclists

The Newham Cyclists neither supported or opposed the proposals, although they stated that the charge has been set at too low a level and that some drivers would seek to avoid it by diverting to other, free crossings. The stakeholder had no objections to the proposed discounts but was concerned that charges would not apply at night.

The stakeholder suggested that the project was too focussed on the needs of private vehicles rather than public transport and active travel and highlighted a risk it perceived in a future administration abolishing the charge altogether. It called for a plan for the delivery of active travel crossings east of Tower Bridge.

### Uber Boat by Thames Clippers

The stakeholder explained that some members of staff rely on their private vehicles to travel to and from work, through the Blackwall Tunnel, as shifts often start outside public transport operating hours. It suggested that the charges could significantly impact workforce planning, therefore asked that its workers be made eligible for discounts or exemptions.

## **Air quality and environmental groups**

### Friends of the Earth England, Wales and Northern Ireland

Friends of the Earth stated its disappointment that no emissions differential was proposed. Whilst it welcomed the discounts and exemptions, especially those proposed for low-income locals, it noted its concerns that these are only proposed for a year.

The stakeholder stated that there should be a wider review of usage of river crossing capacity in east London and consideration of charging all London river crossings. It noted that there is potential for traffic displacement to other pinch point. The stakeholder suggested that all London river crossings should be charged to support the Silvertown Tunnel repayments.

The stakeholder commented on traffic management through Silvertown and Blackwall tunnels, to manage capacity at all east London crossings. It also suggested the Silvertown and Blackwall tunnels, Tower Bridge and Rotherhithe Tunnel should be reallocated to active travel and clean public transport.

## **Accessibility groups**

### Hackney Living Streets

Hackney Living Streets stated that the proposed charges are too low and do not reflect the damaging impact of motor vehicles travelling in London. It suggested that low-income residents should be provided with a TfL voucher with a range of uses, not a specific discount for the tunnels, only usable by those using private motor vehicles.



The stakeholder questioned the proposed business discount and the proposed discount for recovery and breakdown vehicles and black cabs, as businesses. It also asked whether there would be a method of checking the Blue Badge holder in a vehicle when using the discount.

Real (Disabled People's Organisation)

Real stated concern around the Equalities Impact Assessment (EqIA) and the quality and thoroughness of the data within it. It stated that the EqIA does not adequately consider the usage patterns of the Blackwall Tunnel by nearby disabled people, or the potential impacts on small local charities that rely on volunteers, the impact that the charges would have on low-income households and people with protected characteristics that rely on services. It stated that EqIA insufficiently considers intersectionality of characteristics and undermines impacts.

Real supported the Blue Badge holder and Disability-classified vehicles exemption and suggested that this be accompanied by an extensive awareness campaign. It advocated for personal assistants who work on behalf of disabled people also be exempt or be eligible for a reimbursement. Similarly, the stakeholder stated that family and friends that support disabled people should also benefit from a full exemption or discount. It also suggested a reimbursement for charities or voluntary programmes in the three host boroughs until 2029. Real recommended that TfL establish a forum with the third sector to monitor the impact of the proposals on local people and the charity and voluntary sector.

**Freight and logistics groups**

Association of International Courier & Express Services (AICES)

AICES raised concern for the proposal to charge vans and HGVs more than cars for using the tunnels and proposed that this should be reviewed to factor in that the logistics sector is an essential service, which is recognised in the Mayor's Transport Strategy. It argued that there was insufficient rationale provided for the higher rate for vans and HGVs, given the essential nature of cross-modal express services. It noted the disparity between taxis and the express service, noting that both are used for commercial movements.

The stakeholder noted that express movements are time definite, and opposed the proposals to charge more in peak hours, recommending that the peak charges do not apply to vans and HGVs, which are predominantly on the road at peak hours due to business requirements. It also noted that the Dartford Crossing does not include peak hour charging, and suggested this is a better approach.

The stakeholder suggested a complete exemption for electric vans and HGVs and carbon fuelled powered HGVs, until such a point that these vehicles have achieved parity with diesel equivalents. It also recommended that TfL review the charging and regulatory environment to support decarbonisation of fleets.

AICES proposed that employees commuting through the tunnels should benefit from an exemption or a discount to the charge, given it is essential for their livelihoods.

Boleyn Recovery & Fleet Services Ltd

Boleyn Recovery & Fleet Services Ltd stated that motorists in London already face multiple charges and suggested that drivers will seek alternative crossings at peak times, including London bridges, Dartford Crossing and the Woolwich Ferry. It suggested that the tunnels should be free, and the extra capacity used to keep roads moving and reduce emissions from idling traffic.

The stakeholder company agreed with the exemptions for emergency services and military vehicles. It also stated that locally registered recovery vehicles should be exempt, but that the exemptions should not go beyond that.

#### Brewery Logistics Group

Brewery Logistics Group stated that the charge for HGVs is too high, given that journeys are essential to serve businesses in London. It argued that the charge should be reconsidered and applied at the lowest level of payment, or that HGVs should be completely exempt if making essential trips. It also stated that it should be a free return, not a double charge.

#### Destiny Couriers Sameday Ltd

The stakeholder opposed the proposed charges, noting that it uses the Blackwall Tunnel daily and that the charges would impact earnings and its clients. It also noted the impact of the charges on commuters and loss of income for those travelling through the tunnels for work. The stakeholder stated that there should be greater discounts for businesses that have to use the tunnels in both directions, especially courier businesses.

#### DHL

DHL stated that the logistics industry is key to the economic health of London and that any impact on the sector would impact London's competitiveness and increase the cost of living for Londoners. It argued that the company's operations are essential, and that charging will not reduce van and HGV traffic but will increase cost of operations. It stated that the proposals to charge vans and HGVs more than cars does not account for the essential nature of logistics services and that the peak charging will disproportionately affect operations. Peak hour charges would add significant costs to time-sensitive services and the Express division. DHL noted that the Dartford Crossing does not have peak hour pricing.

The stakeholder stated that there is no clear evidence presented as to why vans and HGVs have higher charges proposed compared to other modes, especially when taxis are exempt and are commercial in nature. The stakeholder advocated for freight services to not be charged the higher rate and grant exemptions for freight that already utilises the Blackwall Tunnel.

DHL suggested that TfL consider exemptions for zero emission of low carbon fuelled vehicles, to encourage greater adoption of cleaner vehicles, and to allow exemptions on freight traffic already using the Blackwall Tunnel to service local businesses, to mitigate the costs that will be passed on to local businesses and Londoners.

#### Eddie Stobart Ltd

Eddie Stobart Ltd stated that the proposed charges could greatly increase its operating costs, a cost which it would need to pass onto customers and therefore lead to increased costs for consumer goods. These costs are on top of the current Dartford Crossing and proposed changes to DVS legislation. The stakeholder stated that exemptions should be considered for the logistics industry.

#### Foley & Miles Ltd

Foley & Miles Ltd responded that hauliers are already subject to the Congestion Charge and ULEZ, stating that the proposed charges would be another cost that companies will have to pass onto the customer. The stakeholder noted that the company delivers building materials

into London and therefore increasing charges will impact development in London. The stakeholder suggested that ULEZ compliant HGVs should be exempt or discounted.

#### Logistics UK

Logistics UK supported the Silvertown Tunnel but have concerns about the charging proposals. The stakeholder called for certain electric vans not to be charged at the higher HGV rate, for charges for HGVs and large vans to be lowered (and re-focused on modes for which alternatives exist), for charges not to be greater than at Dartford Crossings and for TfL to introduce a flat rate for freight fleet operators. It emphasised their concern that additional costs to the freight industry would be damaging to London.

#### London Venue Transfer Ltd

The stakeholder stated that the proposed charges are too high and that it could not transfer the costs to clients, as that would risk losing business. It suggested that the £1 business discount is not enough, and that a larger discount should be offered permanently for local businesses.

#### Momart Ltd

The stakeholder stated that, whilst the proposed charges are lower than it anticipated, they are still charges that would be passed onto customers due to growing business costs. It questioned whether analysis has been conducted to consider the economic impact of reducing congestion compared to the economic impact on additional charges on customers because of the proposals.

The stakeholder also referenced the potential impact on people commuting to work, alongside additional charges for motorists.

#### Road Haulage Association (RHA)

The RHA stated that the Blackwall Tunnel is the second most important crossing over the River Thames for HGVs after the Dartford Crossing, with the only viable alternative to both crossings being to drive the entirety of the M25, which has significant cost and environmental implications. It noted that the ability to move through the Blackwall Tunnel easily is vital to preventing congestion and ensuring business confidence in the supply chain.

The stakeholder stated that the direct cost of charging undermines the competitiveness and viability of hauliers in Greater London and the South East, especially for subsectors that require multiple trips per day, such as waste management. It noted that charges could have indirect costs, such as frequent and lengthy delays when HGVs try to access the tunnels which could compound upon operators that require multiple trips per day.

The RHA suggested that TfL waive the charge for HGVs to acknowledge the essential economic contribution of the sector and safeguard SMEs from increasing cost pressures. It suggested convening a stakeholder working group to engage with local industry stakeholders on the implications of the proposals. In the long term, it suggested TfL explore an alternative financial arrangement to ensure maintenance of the two tunnels.

## **Taxi and private hire groups**

### Excel Executive Ltd

Excel Executive Ltd stated that it is unfair that taxis are exempt when PHVs provide the same service, and both the taxi and PHV industry have vehicles that are not yet zero-emission.

### Licensed Taxi Drivers' Association (LTDA)

The LTDA stated that taxi's use of the tunnels is very difficult to predict and strongly supported the proposed exemption to the charge for taxis. The stakeholder provided a range of justification for this exemption to be taken forward and implemented, for example their status as TfL administered public transport and to recognise the efforts of drivers to modernise the fleet.

### Uber UK

Uber UK supported the proposed inclusion of an exemption for zero-emission capable and wheelchair-accessible PHVs, however stated that it is unclear how the 100 per cent discount would be administered when proposed eligibility is only applicable in cases where the journey is fulfilling a private hire booking. It noted that there would be a difficult administrative and operational challenge to distinguish between 'on- and 'off' trips. Uber UK suggested that both zero-emission capable and wheelchair-accessible PHVs should be listed as exempt vehicle types at all times, which would provide greater clarity to Uber drivers.

### United Cabbies Group

The stakeholder supported the discounts and exemptions, stating that they recognise the needs of residents and those who drive for a living and need to use both tunnels.

## **Business groups and businesses (local, pan-London and national)**

### Andrew Cross and Co

The stakeholder stated that the proposals are expensive and would add a cost to operations. It suggested that traffic would not be any better once the Silvertown Tunnel has opened, especially with London City Airport due to expand. The stakeholder stated that there has been insufficient consideration for small businesses in the area or further afield.

### Baldwin & Co

The stakeholder stated that the proposed charges are too high when compared to the Dartford Crossing charges and stated that it is unfair to charge for the Blackwall Tunnel. It opposed the road user charges completely.

### Biggin Hill Floral Studio

The stakeholder opposed the proposed charges, stating that the proposals would have a negative impact on the business. The stakeholder suggested that it would have to consider closing entirely, which would have consequences on the owner's livelihood.

Bluecoat Engineering Ltd

The stakeholder opposed the proposed charges, noting that vans are essential to its business and that staff travel into central London daily. It stated that the business has been impacted by the Congestion Charge and ULEZ.

It opposed charging the Blackwall Tunnel as the business's employees will have to rely on public transport, which it suggested is insufficient. It suggested that the proposed charges would put jobs at risk and impede small businesses.

BusinessLDN

BusinessLDN noted the benefits of the Silvertown Tunnel, but also noted that the proposed charges could potentially increase congestion and could lead to displacement of traffic to other central river crossings, such as Rotherhithe Tunnel and Tower Bridge. It also suggested that there should be clear information provided on whether the charges will cease once the associated costs have been recovered, and that a comprehensive public awareness campaign is launched in advanced of the tunnel opening.

BusinessLDN stated that businesses rely on the Blackwall Tunnel, including freight and delivery companies, which will now face additional operation costs, which the group warned may be passed on to customers. It suggested that the proposals are reviewed to factor the essential services provided by sectors. It also stated that a balanced approach that incorporates both incentives and deterrents is necessary to promote more sustainable travel patterns, and the lack of viable alternative solutions in east and southeast London presents a major challenge for businesses and individuals, so requires further consideration from TfL.

The stakeholder stated that discounts should be given to businesses operating in the vicinity of the tunnels, as they would be disproportionately affected by the charges. It also stated that employees commuting across the two tunnels should also benefit from discounts. The stakeholder also advocated for TfL to explore the potential for an integrated road-pricing system to replace all charges in London.

Bywaters (Leyton) Ltd

The stakeholder sought clarification as to whether they would qualify for a 100 per cent discount to the charge on the basis that they operate vehicles which support central public services.

Canary Wharf Group

Canary Wharf Group stated that the proposed charges are significantly higher than the Dartford Crossing, which it notes is congested and does not apply higher peak charges. It stated that the proposed fares would penalise Canary Wharf workers, given the proximity of the tunnel to the Canary Wharf estate, and could lead to the reduction in commuter coach services to Canary Wharf from the South East.

Centre Point Food and Wine Ltd

The stakeholder stated that small local businesses should be exempt from charges.

Cloud and Horse Production Ltd

The stakeholder suggested that the proposed charge levels are too high for small businesses. It stated that the proposed charges for HGVs are also too high, and that it cannot use

alternative vehicles due to the nature of the business. As a very small company, the proposals would have a significant impact on daily operating costs. The stakeholder asked whether there would be any form of discount or exemptions on peak journeys for local businesses, stating that there should be more extensive discounts for local small businesses.

#### Equinox Partners

The stakeholder stated that the proposals will have a negative impact on those living and working in London, suggesting that they would isolate London from the rest of the country. It noted how journey times have increased travelling in and out of London.

#### Federation of Small Businesses (FSB)

The FSB provided a response on behalf of its business community membership, which represents 99 per cent of London's small businesses. It included case studies from individual businesses that had voiced opinions on the consultation subject to inform its response.

The FSB stated that small businesses reliant on road networks in east London would be impacted by the proposed charges. The stakeholder opposed the additional charge on motorists and small businesses in London. It stated that if the Silvertown and Blackwall tunnels are to be charged, then all river crossings should be tolled to ensure that all motorists travelling within London pay to use vital routes.

The FSB noted that the Dartford Crossing is too far outside of London to be considered, vans are already banned in the Rotherhithe Tunnel, so the next best alternative for a charge free crossing is Tower Bridge, which it considers to be counterintuitive and not environmentally friendly. Additionally, the stakeholder stated that drivers seeking to avoid charges or in instances where the Blackwall Tunnel is closed, congestion will be displaced to Rotherhithe Tunnel or Tower Bridge.

The stakeholder stated that the proposed discount for eligible small businesses, sole traders and charities should be made permanent, not just off-peak. It stated that the discount of £1 on standard off-peak for up to three vehicles should be extended to include a discount on peak charges too. It also suggested that there should be a greater discount for small businesses who have invested in a ULEZ compliant vehicle. Alternatively, the FSB suggested that TfL should offer a reimbursement scheme for small businesses in east London.

The FSB stated that the communications on Auto Pay must be clear to all small businesses, sole traders and charities. It also raised additional points on making the cross-river cycle shuttle-bus permanently free, extending the proposed public transport concessions to all local east London area small businesses and reducing transport costs to support the recruitment of low-income and self-employed people working in London.

#### Fletcher Wilson Ltd

The stakeholder stated that the charges should be at least halved.

#### Fluid I.T Ltd

The stakeholder stated that motorcycles, mopeds and tricycles should not be charged, as there is no precedent for these vehicles being charged on other UK roads or tolls. The company explained that it moved to Tower Hamlets to be part of the regeneration and is situated next to the Blackwall Tunnel approach, so argued that it is unfair to now be charged to use the tunnel. It noted that the business already carpools, with some members of staff

travelling from Kent through the Blackwall Tunnel every day as commuting via public transport takes too much time.

The stakeholder stated that the £1 discount for businesses should always apply, not just during off-peak hours. It noted that the discount currently only supports trades people, not commuters. It suggested that the charges should be lower in general, similar to the Dartford Crossing charge, and removal of charge differences between peak and off-peak charges.

#### Ickenham Aerials

The stakeholder criticised the proposals and stated that charges should not be implemented. It said that the proposals would force small businesses out of London, especially with other charges, such as ULEZ, in place.

#### John Lewis Partnership

John Lewis Partnership explained that it operates in greater and central London on a 24/7 basis, although it does aim to avoid peak times where possible. It raised concerns at the level of proposed charges for the Blackwall and Silvertown tunnels, stating that it would have negative impacts on the company's efforts to help the capital's economic growth and increasing operational and transport costs.

The stakeholder noted that it has invested in Euro 6 and cleaner vehicles and suggested that consideration should be given to freight deliveries into London and offering incentives for companies using cleaner and quieter vehicles.

The stakeholder suggested that TfL reduce the proposed charges, suggesting £3.50/£1.50 for peak and off-peak respectively, and £5.00/£3.00 for HGVs for peak and off-peak travel. It also stated that there should be no exemptions offered for any vehicle using the two tunnels if the primary reason for the charges is to control congestion and emissions.

#### London Chamber of Commerce and Industry (LCCI)

The LCCI supported the Silvertown Tunnel and the proposed discounts for small businesses and low-income east Londoners. It raised concerns regarding the proposed charge rates, particularly for larger vehicles such as vans and HGVs. It stated that the charge for heavier vehicles is disproportionately high, despite them being essential to London's logistics industry. Additionally, the stakeholder stated its concern that the proposed chargers for HGVs and large vans at peak times would represent significant costs to companies. It recommended reducing the charges for HGVs and large vans.

The LCCI also noted its concern about the disparity between the proposed rates for the Silvertown and Blackwall tunnels and the existing charges for the Dartford Crossing. It warned that utilising different charging rates may cause traffic displacement to outer London areas. The LCCI recommended that the proposed chargers are lowered to match those of the Dartford Crossing.

#### London City Airport

London City Airport stated its general support for the user charges proposals. The Airport noted its support for the non-charging period between 22.00 and 06.00, especially as a significant portion of staff finish working after 22.00 and rely on their private vehicles. Regarding this, it stated that it continues to advocate for greater provision of early DLR services to support staff and customers to opt for public transport.

The stakeholder suggested that the concessions and exemptions be extended to those who are on the London Living Wage. It noted its support for the free cross-river public transport provision, and also provided comment on the new route 129 bus which will provide service to the airport when the Silvertown Tunnel opens. The stakeholder also stated that the free provision should be extended beyond a year in order to encourage modal shift. Regarding the DLR concession, the stakeholder suggested that the free service should be extended to London City Airport DLR station, due to its major destination status and key interchange point for customers.

#### LoveGunn

LoveGunn opposed the proposed charges for south east London residents, noting that residents in other areas of London are not subject to river crossing charges. It stated that south and east London have fewer public transport options and has benefited from less investment and noted the additional charges for motorists. With the charges for Blackwall and Silvertown tunnels as well as the Woolwich Ferry and Dartford Crossing, the stakeholder stated that drivers will use the Rotherhithe Tunnel instead.

#### Maurice and Doris Ltd

The stakeholder stated that the Blackwall Tunnel should remain free to residents and inner Londoners, and stated that the discounts and exemptions do not sufficiently support residents.

#### McCormacks Solicitors

The stakeholder supported the proposed charges, explaining that it believes they are at the right level to discourage unnecessary journeys by vehicle, and would incentivise company employees to use public transport where it is a viable option. It also stated that the proposed discounts are fair.

#### Midix Ltd

The stakeholder stated that the proposed peak hour charges are too high. It suggested that the charges are unfair for residents who rely on their cars for commuting and business, therefore it suggested that residents living within a 5km radius should be exempt from the charges.

#### Newham Chamber of Commerce

The Newham Chamber of Commerce supported the charges at Silvertown Tunnel and Blackwall Tunnel, however is concerned that crossings in other parts of London are not charged, and that this should be reconsidered. It noted concern that having an off-peak rate for HGVs will put more HGV traffic in the area. The stakeholder stated that HGVs should always pay flat rate of £10, and regardless of payment method, to mitigate the impact of HGVs converging on the Silvertown Tunnel from the east.

It stated that it would prefer to see discounts for all vehicles registered as business vehicles that typically start or finish daily business journeys in one of the host boroughs. The stakeholder welcomed encouraging more zero-emission traffic, but that it must be supported with easy access and affordable charging stations. It also stated that a thorough communications approach must be in place when the charges come into force.

#### Positive Behaviour Active Support Ltd



The stakeholder opposed the proposed charge for Blackwall Tunnel, citing the charges that drivers are already subject to and that this would be an additional financial burden. It stated that this approach penalises drivers who rely on the Blackwall Tunnel as a crucial route across the river. The stakeholder stated that public transport infrastructure should be improved instead.

#### Rapid Office Systems

The stakeholder raised that the proposed charges would impact small businesses and make it harder for them to operate. It stated that costs of the Silvertown Tunnel should be covered by the Congestion Charges and ULEZ charge.

#### Roblett Electrical Contractors

The stakeholder stated that the charges will impact local businesses and could drive price inflation in London. It also stated that the proposed discounts and exemptions are insufficient.

#### Royal Docks Medical Practice

The stakeholder suggested that the proposed charge times are too late and that the tunnels should be free of charge after 20.00. It stated that the proposed charges are too high and should be reduced by at least 50 per cent. The stakeholder suggested that the penalty charge should be reduced to one third of the current proposals, and that small businesses should be exempt.

#### Royal Mail

Royal Mail explained that it has already made considerable efforts to consolidate and reduce emissions. It stated concern that its costs would increase with the introduction of charges for both tunnels, especially as there are regular delivery routes that use the Blackwall Tunnel, and soon Silvertown Tunnel, every day. Its alternative would be to avoid the charges, which would increase the emissions of a delivery route. The stakeholder requested that it be eligible for an exemption, referencing other local authorities that have granted exemptions to the company, such as Durham for its Clean Air Zone.

#### Singway 2 Ltd

The stakeholder stated that the peak charge is too high, and that the charges should be similar to the Dartford Crossing. It questioned why people commuting during peak hours should have to pay charges, especially when the Blackwall Tunnel is currently free of charge. It suggested that there should be a free of charge period, like the Congestion Charge zone.

#### South East London Chamber of Commerce (SELCC)

The SELCC opposed the proposed charges, suggesting that they will have adverse effects on the Greenwich local community and economy. It stated that proposals would impose a substantial economic burden on employees who work in Greenwich and disproportionately impact those who rely on the tunnels for their daily commute, especially in the absence of viable public transport alternatives. The stakeholder stated that the charges could impact recruitment and retention of employees and negatively impact businesses in Greenwich, as well as impacting tourism, trade and educational institutions.

SELCC suggested that the Dartford Crossing provides a precedent for a fairer and more reasonable charging structure, with discounts for residents of adjoining boroughs. Therefore, implementing a similar model for the Silvertown Tunnel would mitigate some of the adverse

effects. It also suggested that the charge rates be reduced to the Dartford Crossing rates. The SELCC stated that there should be exemptions for students studying in the borough, and subsidies for individuals commuting into the borough for tourism or leisure.

#### Surge Cooperative

The stakeholder suggested that the discount for charities and small businesses should also extend to include cooperatives, non-for-profit community interest companies and voluntary groups. It noted that many of these organisations do charitable work but are not all registered charities.

#### The Black Lion

The Black Lion responded to the online survey that they use the Blackwall Tunnel 2-3 times a week and intend to partially switch their journeys to the Silvertown Tunnel, but did not provide written comments.

#### The Rail & Station Innovation Company

The stakeholder stated that the proposals would increase the costs of business, therefore asked whether there could be a day return business price offered instead. It stated that the proposed discounts would not help the business, and would instead reduce the amount of work the company could conduct north of the river.

#### Unique Venues Consultancy

The stakeholder stated that the tunnels should be free to use during off-peak hours, with higher charges for peak use between 07.00 - 10.00am and 17.00 - 19.00.

#### Waste-A-Way Recycling Ltd

The stakeholder stated that the consultation did not consider the needs of London's HGV business users. It explained that it considers its operations essential to support London's environmental infrastructure, due to its waste removal services. It stated that the introduction of further charges would force it to reconsider whether providing services to London's councils is viable business.

### **Local interest groups, faith groups, schools**

#### All Hallows Bow

The Church stated that the proposals would penalise local residents, stating that residents should not have to pay the charges.

#### Brockley Community Church

The Church stated that charging peak charges is unfair for teachers, NHS staff and residents who live in Greenwich or Lewisham and work across north of the river. It raised that the Blackwall Tunnel has been free since opening, and that crossings in west London are free to use, therefore suggested that the proposals discriminate against east Londoners. The stakeholder also questioned whether the 50 per cent discount for east London low-income residents would apply to pensioners.

Certain Blacks

The stakeholder suggested that the charges are unfair and could impact clients, as well as people who need to travel across the river for work. It supported the business discount.

Chobham Academy, Newham

The stakeholder suggested that there should be a discount for teachers and school workers who use the tunnels, noting that teachers have to travel during peak hours. The stakeholder raised issues with recruiting and retaining teachers, noting that Newham in particular faces challenges with this.

City Bridge Foundation

The City Bridge Foundation noted its purpose is to maintain and support the five bridges crossing the River Thames. The stakeholder opposed the proposed charges for both Silvertown and Blackwall tunnels, as it argued that the charges will have a detrimental impact on Tower Bridge and its other bridges, as well as increasing traffic flows and weight loads, impacting the road network and slowing down crossing times.

The stakeholder suggested that TfL may have failed to meet obligations to manage the Highway Network safely. It noted that the diversion of vehicles to Rotherhithe Tunnel and logistical challenges with Light Goods Vehicles. It raised concern that the Monitoring and Mitigation Strategy does not include Tower Bridge, suggesting that it should be afforded protection. It also noted that there is no clear definition of the vehicle categories for the proposed charging regimes and for Goods Vehicles that exceed the charges currently applied at the Dartford Crossing.

The stakeholder commented that there is no split in the calculation of the charges between recovery of the construction costs and the proposed congestion deterrent, which they asked TfL to provide. It mentioned that the proposed timings of the charges are significantly increased to existing TfL restrictions and suggested these should, be adjusted in line with the Congestion Charge and the restrictions to traffic on London Bridge.

The stakeholder raised that Tower Bridge is not represented at the Silvertown Tunnel Implementation Group (STIG), therefore has not been part of past conversations on the impacts of the tunnel. The stakeholder stated that it wants to become a member of STIG and be involved with the Monitoring and Mitigation Strategy. It stated that all alternative directional signs for non-compliant vehicles and future maintenance closures should be via the Dartford Crossing and parity between the tunnel charge periods and Congestion Charge periods. It also sought confirmation that future maintenance of Tower Bridge traffic diversions through the new crossings will not be charged.

Emmaus Greenwich

The stakeholder stated that the peak charges are expensive and not fair when the crossings in west London are free of charge. It also suggested that charities were considered exempt from the charges.

Kingsway International Christian Centre

The stakeholder suggested that the peak charges for cars and small vans seem high compared to the Dartford Crossing. It also stated that coaches and minibuses should be exempt, if being offered a 100 per cent discount. It questioned whether the percentage discount instead of an exemption means that it could be removed at a later point.

Newham Muslim Forum

The stakeholder suggested that the proposed charges are too high and that the peak charges should be lower. It stated that people should not be penalised for paying outside of Auto Pay. The stakeholder stated that discounts should apply to all residents, not just those on low-incomes, and suggested that social enterprises should also get discounts.

The stakeholder also noted that the Blackwall Tunnel is important for residents in surrounding boroughs to visit burial sites, such as in Chislehurst. It stated that the charges would impact wellbeing for those visiting burial sites and asked whether this had been factored into the equalities impact assessment.

Stop the Silvertown Tunnel Coalition

The stakeholder is opposed to the Silvertown Tunnel and charging at the Blackwall and Silvertown tunnels. It supports the use of Silvertown Tunnel by public ,cargo bikes and active travel modes exclusively, and suggested the introduction of London-wide user charge.

Woolwich Evangelical Church

The Church suggested that the charges should be removed once the Silvertown Tunnel construction costs are repaid. It stated that there will still be congestion either side of the tunnels, but that the Woolwich Ferry and Rotherhithe Bridge would also be subject to increased congestion if people divert to avoid the charges. The stakeholder suggested that residents in south east London should receive discounts, and that motorcycle users should be exempt.

**Others**

British Security Industry Association

The stakeholder stated that the charges would have a detrimental impact on the Cash and Valuables in Transit Industry. It stated that the discount is not high enough, and that a higher discount is needed for the industry if a full exemption cannot be granted.

HMP Belmarsh, Isis and Thameside

The stakeholder asked for consideration to be given for HMP Belmarsh, HMP Thameside and HMP Isis staff to receive an exemption for the proposed charges. It stated that many staff who work at these establishments live on either side of the tunnels and that the charges would put financial pressure and hardship on staff. Additionally, it raised that it would impede recruitment and retention of staff.

Homecare Association

The stakeholder suggested that care workers are given parity with NHS staff, noting the current proposals for exemptions includes NHS vehicles and reimbursements for NHS staff. It noted that homecare workers need to travel for their work, and that the sector is already under financial pressure, especially in London. The stakeholder stated that local authorities are unlikely to raise fee rates to cover the additional costs of the tunnel charges, which could destabilise the sector. It urged TfL to add exemptions or reimbursements for homecare workers.

RMT

The RMT stated that some shift workers have no option but to drive during certain hours, as there is no public transport provision at those times. It stated concern that some RMT members would be subject to charges to travel to work when there are no viable transport alternatives. It requested that TfL staff pass holders that travel to work via car due to no viable alternative be exempt or reimbursed for the total amount of the charge.

## Appendix F: List of stakeholders consulted with

A2 Dominion Group	A2Dominion Homes Limited	Aardra Systems Ltd
Abney Public Hall	Absolute Party Cruises	ACE
Action and Rights for Disabled People in Newham	Action for Blind People	Action on Hearing Loss (RNID)
Action Vision Zero	Addison Lee	Advocacy for All
Age UK	Age UK City of London	Age UK Havering
Age UK London	Age UK Orpington & District	Age UK Waltham Forest
Ahoy Sailing & Rowing Centre at Deptford centre	AICES Express Courier Assoc.	Airport Bus Express
Aladura International Church	All Saints Catholic School and Technology College	All Saints Church
Altmore Infant School	Alzheimer's Society Waltham Forest	AM for Bexley and Bromley
AM for City and East	AM for Havering and Redbridge	AM for Lewisham and Greenwich
AM for North East	AM for Southwark and Lambeth	Amazon
AmicusHorizon Limited	Anchor Trust	Angel AIM
Angersteins Inner Jetty (Days Aggregates)	Angersteins Wharf (Cemex)	Anjuman-e-Islamia Jamia Mosque
Ansco AEG	Apasen	Apostolic House of Prayer
Argall	Armada Community Project	Around Poplar Children's Centre
Ascension Church & Community Centre	ASD (Kloeckner Metals UK)	Ashford Borough Council
Asian People's Disability Network	Asian Women's Lone Parents Association	Asra Housing

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Association for Consultancy and Engineering (ACE)	Association of Newspaper Distributors	Automobile Association (AA)
Avenue Primary School	Aziziye Education Centre	B&D Access Group & IIDP
Bankside Residents' Forum	Barbican Association	Barhale
Barking - Gospel Oak Rail User Group	Barking & Dagenham CCG	Barking & Dagenham Council
Barking & Dagenham CVS	Barking & Dagenham Chamber of Commerce	Barking Abbey School
Barking and Dagenham Adult Social Care team	Barking and Dagenham Family Information Service	Barking and Dagenham Leaseholders Association
Barking and Dagenham Social Services	Barking Mobility Forum	Barking Reach Residents Association
Barking, Havering & Redbridge hospital	Barts Health Trust	Basildon
Bateaux London	Bazalgette Tunnel Limited	Becontree Residents Association
Becontree Ward Central Tenants and Residents Association	BeFirst	Belvedere Community Forum
Bengali Parents SEN Group	Bennetts Barges	Berner TRA
Betar Bangla	BETRA (Barnstaple Estate Tenants and Residents Association)	Better Bankside BID
Bexley African Caribbean Community Association (BACCA)	Bexley Association of Turkish Speakers (BATS)	Bexley Civic Society
Bexley Clinical Commissioning Group	Bexley Council	Bexley Deaf Centre
Bexley Dodgers Boccia Club	Bexley Down's Syndrome Group	Bexley Mencap

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Bexley Neighbourhood Watch	Bexley NHS Care Commissioning Group	Bexley Pensioners Forum
Bexley Snap	Bexley Voluntary Service Council	Bexley Family Information Service
Bexleyheath & District Club for the Disabled	Bexleyheath BID	BIFA
Biggin Hill Community Association	Birch	Birchfield TRA
Birch Sites/National Grid	Bird College of Dance	Blackheath Society
Bobby Moore Academy (Academy)	Bolt	Bonny Downs Baptist Church
Braintree District Council	Brampton Moore Academy (Academy)	Brampton Primary School
Brenntag	Brentwood Council	Brewery Logistics Group
Brick Lane Music Hall	Britannia Village Management Company	Britannia Village Primary School
British Association of Removers	British Athletics	British Beer & Pub Association
British Deaf Association (BDA)	British Land	British Motorcycling Federation
British Red Cross	British Retail Consortium	British Vehicle Rental and Leasing Association
British Youth Council (BYC)	Bromley & District Consumer Group	Bromley BID
Bromley Council	Bromley Cyclists	Bromley Experts by Experience CIC
Bromley Mencap	Bromley Mobility Forum	Bromley Voice
Bromley Well	Bromley Disabled Children's team	Bryant Street Methodist Church
BT Group plc	Building Crafts Academy	Business LDN
Cable & Wireless Communications plc	Calvary Charismatic Baptist Church	Calverton Primary School
Campaign for Better Transport	Canal & River Trust	Canal and River Trust



*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Canary Wharf Group	Canary Wharf Management Ltd	Canterbury City Council
Capital Pleasure Boats	Carers Hub (Carers of Barking and Dagenham)	Carers' Support (Bexley)
Carpenters Primary School	Castle point Council	Catholic Parish Church of St Peter
Catholic Parish of the Royal Docks	CBI	CCG Bexley
CCG Central London (WESTMINSTER)	CCG City and Hackney	CCG Greenwich
CCG Havering	CCG Hounslow	CCG Lewisham
CCG NHS Central London	CCG Redbridge	CECA
Celebrations Theatrical Group	Central Baptist Church	Central London Freight Quality Partnership
Central Park Primary School	Centrepoint	Chadwell Heath Baptist Church
Chadwell Heath Residents Association	Chadwell Heath United Reformed Church	Chair of the Transport Committee
Charlton Athletic Community Trust	Charlton Central Residents Association	Charlton Rail Users Group
Chartered Institute of Logistics & Transport (CILT)	Chartered Institution of Highways & Transportation (CIHT)	Chas Newens Marine
Cheapside Business Alliance	Chelmsford City Council	Child Poverty Action Group
Chinese Association of Tower Hamlets	Chingford Line User Group	Chislehurst and Sidcup Housing Association
Chobham Academy (Academy)	Choice in Hackney	Chrip Street Children's Centre
Christ Apostolic Church	Christian Hope Ministry	Church of Assumption
"Church of England Parish of East Ham	St Bartholomew's Church & St Mary Magdalene's"	Church Road Masjid
Circle 33	Citizens advice	Citizens UK

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

City Connections Service (Part of Age UK East London)	City Cruises	City Gateway Women's Project
City of London Access Group	City of London Corporation	City of London Corporation
City of London Police	City of Peace Community Church	CityCommunity and Children's Services
Civil Aviation Authority	Civil Engineering Contractors Association (CECA)	Clapton Park United Reformed Church
Classic Yacht Charters	Clayhall Neighbourhood Watch	Cleves Primary School
Colchester City Council	Cold Blow Residents Association	Colegrave Primary School
Colliers Launches	Collingwood Children's Centre	Comms team Bexley
Comms team Tower Hamlets	Communit Waltham Forest	Community Cafe
Community Links Bromley	Community Links Trust	Community Southwark
Community Transport Association (CTA)	Community Transport Waltham Forest	Compass Point Residents Association
Complete Pleasure Boats Limited	Compost CIC	Confederation of British Industry (CBI)
Confederation of Passenger Transport	Confederation of Passenger Transport UK	Co-operative Development Society Limited
Cory Environmental	Council for Disabled Children	Cranbrook Baptist Church
Crayford Community Centre	Crayford Forum	Crown Estate
Crown River Cruises	Cruise London Ltd	CTC
CTR Triangle	Cumberland School	Cundy Community Association
Curlew Rowing Club - Greenwich	Curwen Primary School	Custom House Baptist Church

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Cycle confident	Cycle Newham	Cycle sisters
Cycling UK	Dads Network	Dagenham Park Church of England School
Dartford Borough Council	Dartford Council	DELTA (Durham and Elvet Avenue Tenant Management Organisation)
Department for Transport	Deputy Chair of the Transport Committee	Dersingham Primary School
DHL	Disability GroupRights UK	Disabled Persons Transport Advisory Committee
Disablement Association Barking and Dagenham (DABD)	Docklands Light Railway (DLR)	Docklands Sailing and Watersports Centre
Docklands Wharf (Euromix)	Dorset Community Association	Dover District Council
DPD	Drew Primary School	Durning Hall Community Centre
E20	EAL	Earlham Primary School
East & South East London Transport Partnership	East End Community Foundation	East Greenwich Residents Association
East Ham Elim Church	East Homes Limited	East London Advanced Technology Training
East London Business Alliance	East London Chinese Community Centre	East London Garden Society
East Thames Group	Eastbrook Comprehensive School	Eastend Homes
Eastlea Community School	Eastney Street TRA	Eastside Youth Havering
Ebrahim Community College	EDF Energy plc	EEF (Engineering Employers' Federation)
EGRA	Elim Pentecostal Church	Ellen Wilkinson Primary School

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Elmhurst Primary School	ELOP - East London out Project	Emirates Airline (EAL)
Emmanuel Christian Centre	Emmanuel Parish Church	EMR (Tenant Keltbray)
End Violence Against Women	English Heritage	Environment Agency
Environmental Protection UK	Epping Forest	Ericsson Limited
Erith Town Forum	Essex County Council	Essex County Council
Essex Primary School	Essex Wildlife Trust	Evangelical Reformed Church
Evelyn Road Residents Association	Evri	ExCeL
Excel Women's Centre	Fairview	Faith Action
Faith Regen Foundation LTD	Family Mosaic	Federation of Small Businesses
Federation of Small Businesses (FSB)	Fight for Peace	Fight for Sight
FLiXBUS	Folkestone and Hythe District Council	Food Storage and Distribution Federation
Forest Baptist Church	Forest Gate Community School	Forsters Bexley school
Frampton Park Baptist Church	FREE NOW	Freight Transport Association (FTA)
Friends of the Earth	FSB	Fusion foods
Gainsborough Primary School	Galleons Point Residents Association	Gallions Housing Association
Gallions Primary School	Gallions Reach Shopping Park	Gascoigne Neighbourhood Association
Gateway Club Orpington and Bromley	Gateway Housing Association	General Marine
GETT	Glad Tidings Church	Global Black Maternal Health

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Globe Rowing Club	GMB	Godwin Junior School
GPS Marine	Grange Primary School	Gravesham Borough Council
Greater London Authority	Greater London Authority (GLA)	Greater London Forum for Older People (GLF)
Greek Orthodox Archdiocese of Thyateira and Great Britain	Green Alliance	Greenpeace
Greenwich Association of Disabled People	Greenwich Carers Centre	Greenwich Clinical Commissioning Group
Greenwich Council	Greenwich Creekside Residents Association	Greenwich Cyclists
Greenwich Family Information Service	Greenwich Kurdish Community Association	Greenwich Millennium Village Association
Greenwich Millennium Village Residents Association	Greenwich Mums	Greenwich Peninsular Chaplaincy
Greenwich Society	Greenwich United Church	Greenwich University
Greenwich Yacht Club	Grove Hill Evangelical Church	Guide Dogs
Gurdwara Karamsar	Gurdwara Sikh Temple	Gurdwara Singh Sabha
Guy's and St Thomas' Hospital	GXO	Habinteg Housing Association Limited
Hackney and East London Synagogue	Hackney and Tower Hamlets Friends of the Earth	Hackney Chinese Community Services
Hackney Council	Hackney CVS	Hackney Disability GroupBackUp
Hackney Pentecostal Apostolic Church	Hackney People First Big Group meeting	Hackney Safer Transport Team
HackneyFamily Information Service	Hainault Business Park BID	Hainault Road Baptist Church
Hallsville Primary School	Harlow Council	Harmony Hall
Harris Science Academy	Hartley Primaru School	Havering CCG

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Havering Council	Havering Voluntary and Community	HaveringFamily Information Service
HBC Community Centre	Health & Safety Executive	Healthwatch
Healthwatch Tower Hamlets	Heritage Boat Charters	Hexagon Housing Association Limited
High Street South Methodist Church	Higham Residents Association	Highams Park United Reformed Church
Highway Church	Highways Agency	Holy Trinity Church
Home from Home HA	Homerton University hospital	Hope Baptist Church
Hope Church Newham	HopeWell School	Housing & Care 21
HSBC	Hurst Community Centre	HuskBrewing
Hyde Housing Association Limited	ICE	Ikea
Ilford Synagogue	IMechE Automobile Division	Immaculate Heart of St Mary and St Dominic
Impact on Urban Health	Inclusion London	Independent Disability Advisory Group (IDAG)
Independent Living Agency	Independent Shoreditch	Institute for Sustainability
Institute of Advanced Motorists	Institute of Couriers	Institute of Directors (IoD)
Institution of Civil Engineers (ICE)	Instone Wharf (ASD Metal Services Ltd)	Intelligent Transport Advisory Group on EU Commission
Interoute Communications Limited	Isle of Dogs Children's Centre	IWGB
Jo Richardson Community School	John F Kennedy School, Beckton Campus	John Lewis
John Lewis/Waitrose	John Smith Children's Centre	Joint Nature Conservation Committee
Jubilee Church Ilford	Just Say Parents Forum	Kaizen Primary School
Kasmiri welfare alliance	Keir Hardier Primary School	Keniston Housing Association Limited

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Kensington Primary School	Kent County Council	Kent County Council
Kent County Council	King Cruises	King's College London
Kingsford Community School	Kingsley Hall Church and Community Centre	Kingsway International Christian Centre
Knight Dragon	Langdon School (Academy)	Lathom Junior School
LCDC	Leaders in Community	Learning Disabilities Partnership Board
Learning Disability Transport Forum (through Amy Edgar)	Leftley Estate Community Association	Leonard Cheshire Disability
LEVC	Lewisham Clinical Commissioning Group	Lewisham community Transport group
Lewisham Council	Lewisham Living Streets	Lewisham Local
Lewisham Nexus Service	Lewisham Safer Transport Team	Lewisham Shopping Centre
Lewisham Speaking Up	Lewisham Family Information Service	LewishamLife
LewishamSEN	Leytonstone United Free Church	Licensed Private Car Hire Association
Licensed Taxi Drivers Association	Lidoka	Lifeline Projects
Lister Community School	Little Ilford School	Livett's Launches
Living Flames Baptist Church	Living Streets	Living Streets
Living Streets - Hackney	Living Streets - Lewisham	Living Streets - Newham
Living Streets - Tower Hamlets	Living Streets Southwark	Local Space Ltd
Logistics UK	London & Quadrant Housing Trust	London Academy of Excellence
London Alevi Cultural Centre and Cemevi	London Ambulance Service NHS Trust	London Borough Lewisham

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

London Borough of Barking & Dagenham	London Borough of Bexley	London Borough of Bromley
London Borough of Bromley Residents Association	London Borough of Hackney	London Borough of Havering
London Borough of Lewisham	London Borough of Newham	London Borough of Redbridge
London Borough of Southwark	London Borough of Tower Hamlets	London Borough of Waltham Forest
London Borough Tower Hamlets	London Bridge Team	London Cab Drivers' Club Ltd
London Chamber of Commerce	London Chamber of Commerce and Industry (LCCI)	London City Airport
London Cycling Campaign	London Cycling Campaign - Barking & Dagenham	London Cycling Campaign (City)
London Cycling Campaign (Hackney)	London Cycling Campaign (Havering)	London Cycling Campaign (Lewisham)
London Cycling Campaign (Redbridge)	London Cycling Campaign (Southwark)	London Cycling Campaign (Waltham Forest)
London Cycling Campaign (Wandsworth)	London Cycling Campaign Greenwich	London Design & Engineering
London European Partnership for Transport	London Fire & Emergency Planning Authority	London Fire and Emergency Planning Authority
London Fire Brigade (LFEPA)	London First	London Forum of Amenity & Civic Societies
London Gypsy and Traveller Unit	London Party Boats	London RIB Voyages
London River Cruises	London Riverside BID	London Senior Social
London Sight Loss Council	London Somali Community Alliance	London South East Colleges



*Consultation Report (Silvertown & Blackwall tunnels user charge)*

London Tenants Federation	London Tourist Coach Operators Association (LTCOA)	London Travel Watch
London TravelWatch	London Vision South East	London Visual Impairment Forum (LVIF)
London Voluntary Service Council	London Wildlife Trust	London Youth
Longnor TRA	Look Ahead Housing and Care Ltd	Loughton Trinity Methodist Church
Low Carbon Vehicle Partnership	LPHCA	LTDA
Maidstone Borough Council	Major Road Baptist Church	Make UK (formerly EEF)
Maldon	Manor Park Christian Centre	Manor Primaru School
Manor Road United Reformed Church	Marine Management Organisation	Maritime and Coast Guard Agency
Maritime Yacht Charters	Marnar Children's Centre	Marnar Parents Forum
Maryland Primary School	Masjid Al Taweed	"Masjid e Quba
North London Mosque"	Masjid Madrasah Al-Tawhid Trust	Mauritian Islamic Welfare Association
MBNA Thames Clippers	Meath Gardens Children's Centre	Media relations team Newham
Member Planning	Member Policy and Resources:Chairman Children's Services:Chairman Social Services:Member Planning	Member Policy and Resources:Chairman Finance
Member Policy and Resources:Chairman Leisure Services	Member Policy and Resources:Chairman Other	MENCAP
Meridian Community Garden and Allotment	Metropolitan Police	Metropolitan Police - Marine Policing Unit
Metropolitan Police Authority	Metropolitan Police Service	Mile End Children's Centre

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Mile End Community Project	Millennium Primary School	MiNet/ROTA
Ministry of Restoration International Pentecostal Church	Monega Primary School	Morden College
Motorcycle Action Group	Motorcycle Industry Association	Mount Green Housing Association Limited
Mountain of Fire and Miracles Ministries	Mowlem's Children Centre	MP for Barking
MP for Beckenham and Penge	MP for Bermondsey and Old Southwark	MP for Bethnal Green and Stepney
MP for Bexleyheath and Crayford	MP for Bromley and Biggin Hill	MP for Camberwell and Vauxhall
MP for Chingford and Woodford Green	MP for Cities of London and Westminster	MP for Dagenham and Rainham
MP for Dulwich and West Norwood	MP for East Ham	MP for Eltham & Chislehurst
MP for Erith and Thamesmead	MP for Greenwich and Woolwich	MP for Hackney North and Stoke Newington
MP for Hackney South and Shoreditch	MP for Hornchurch and Upminster	MP for Ilford North
MP for Ilford South	MP for Islington South and Finsbury	MP for Lewisham East
MP for Lewisham North	MP for Lewisham West and East Dulwich	MP for Leyton and Wanstead
MP for Old Bexley and Sidcup	MP for Orpington	MP for Peckham
MP for Poplar and Limehouse	MP for Romford	MP for Stratford and Bow
MP for Tottenham	MP for Walthamstow	MP for West Ham
Mums for Lungs	Murphys Wharf (Hansons)	Muscular Dystrophy UK
National Autistic Society	National Children's Bureau (NCB)	National Council for Voluntary Youth Services (NCVYS)

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

National Express	National Federation of Retail Newsagents (NFRN)	National Grid
National Health Service Commissioning Board	National Highways	National Joint Utilities Group Ltd (NJUG)
National Motorcycle Council	National Trust	National Union of Students
Natural England	NCT- Beckenham	NCT- Bexley
NCT- Bromley & Chislehurst	NCT- Crystal Palace	NCT- Dulwich
NCT- Greenwich	NCT- Hackney	NCT Havering
NCT- Lewisham	NCT- Newham	NCT- Orpington
NCT- Redbridge	NCT- Tower Hamlets	NCVO
Nelson Primary School	Network Housing Group	New City Primary School
New Horizons Federation	New Life Church Centre	New London Architecture
New Testament Church of God	New Unity	Newark Youth London
Newham CCG	Newham Chamber of Commerce	Newham Clinical Commissioning Group
Newham College of Further Education	Newham Collegiate Sixth Form Centre	Newham Council
Newham Cyclists	Newham Sixth Form College	Newham University hospital
NewhamFamily Information Service	NEWTEC, East London Childcare	NHS CCG Bromley
NHS CCG Newham	NHS England	NHS London Ambulance Service
NHS Tower Hamlets CCG	Nia	No 2 Silvertown
No Place for Hate Forum	Noise Abatement Society	Nokia UK
Noor-ul- Islam Mosque	North Beckton Primary School	North Cray Neighbourhood Centre
North Cray Residents' Association	North London Muslim Centre	North London Strategic Alliance

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

North London Transport Forum	North-East ICB	Notting Hill Housing Group
Notting Hill Housing Trust	Nuplex (Silvertown Land Holdings Ltd)	Nuplex Resin Limited
O'Keefe Construction Ltd	O2 (AEG)	O2 Arena
Oasis Academy Silvertown (Free School)	Odessa Infant School	Old Ford Housing Association (Circle Housing)
Omega Housing Limited	One Housing Group	One Housing Group Limited
Orchard Tenant & Residents Association	Orpington First BID	Our Lady and St George Catholic Church
Our Lady of Grace & St Teresa	Our Lady of Lourdes	Oxleas NHS Foundation Trust
Oxlow Lane Baptist Church	PACTS (Parliamentary Advisory Group for traffic Safety)	Pakistan Welfare Association
Panjabi Centre	Parish Church of St Thomas More	Park Primary School
Parkinson's UK Waltham Forest	Parkside Community Centre	Partnership for Young London
Passenger Focus	Peabody	Peabody Group
Peabody Trust	Peruvian Wharf	PETRA (Parkhill Estate Tenants and Residents' Association)
Petts Wood & District RA	Places for People	Plaistow Primary School
Plashet School	Poplar HARCA	Poplar, Blackwall & District Rowing Club
Port of London Authority	Port of London Authority (PLA)	Portway Primary School
Positive Parents	Possible	Powerhouse International Ministries
Praxis Community Projects	Prince's Trust	Princess Pocahontas

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Priority TM	Private Hire Car Association	Providence Row Housing Association
Quwwat-UI-Islam Society	RAC Foundation for Motoring	RADAR
Radha Krishna Temple	Rail Delivery Group (RDG)	Railfuture Ltd
Rainbow Hamlets	Rainbow Trust Children's Charity	Ranelagh Primary School
Ravenscroft Primary School	REAL	Real - Local Voices
Real - Local Voices and Accessible Transport Forum	Redbridge Buddhist Cultural Centre	Redbridge Council
Redbridge Council for Voluntary Services	Redbridge Cycling Centre	Redbridge Disability Group Association
Redbridge Disability Group Consortium	Redbridge Pensioners Forum	Redbridge United Synagogue
Redbridge Families Information Direct	Reede Road Tenants and Residents Association	Remploy
RHA	Ridgeway Church Chingford	River Thames Boat Hire Ltd
Riverside Bridge School	RMT	RNIB
Road Haulage Association	Road Haulage Association (RHA)	Road Safety GB
RoadPeace	Robert Clack School	Rochford
Rokeby School	Roman Catholic Church of St John the Baptist	Roman Catholic Church of St Jude
Roman Catholic Church of St Monica	Roman Catholic Church of St Scholastica	Rose Bruford College
Rosetta Primary School	Rotary Club - Bromley	Rowing Activities at Trinity Buoy
Royal Borough of Greenwich	Royal Connections	Royal London Society for the Blind (RLSB)

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Royal Mail	Royal National Lifeboat Institution (RNLI)	Royal Princess Hospital
S. Walsh	Sailing Barge Lady Daphne	Saint John the Baptist Catholic Church
Salisa Project	Salisbury Primary School	Salvation Army
Sanctuary Housing Association	Sandringham Primary School	Sarah Bonnell School
School 21 (Free School)	SCOPE	Scott Wilkie Primary School
Scrattons Estate Tenants and Residents Association	Secretary of State for Defence	Selwyn Primary School
Sevenoaks District Council	Seventh Day Adventist Church	SGN
Shaftesbury Primary	Shalom Justice and Peace Centre	Sheringham Primary (Academy)
Shernhall Methodist Church	Shiloh Pentecostal Church	Shopmobility Waltham Forest
Shree Sanatan Dharm Mandal Durga Mandir	Sidcup Community Group	Sight Centre in Bromley
Silvertown Homes Limited	Sir John Heron Primary School	Skills for Growth
Slade Green Community Forum	Society Links Tower Hamlets	Society of Motor Manufacturers and Traders (SMMT)
Somali Parent and Children Play Association	South Bank Employers Group	South Chingford Congregational Church
South East London Chamber of Commerce	South East London Vision	South Greenwich Forum
South Leytonstone Area Development Association (SLADA)	South-East ICB	Southern Gas Networks (SGN)
Southern Housing Group	Southern Housing Group Limited	Southern Road Primary

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Southwark Council	Southwark Cyclists	Southwark Disablement Association
Southwark resource centre SE17 2QB	Southwark Safer Transport Team	SouthwarkFamily Information Service
Spitalfields Housing Association	Sri Mahalakshmi Temple	St Andrew's Church
St Angela's and St Bonaventure's Sixth Form	St Angela's Catholic (Voluntary Aided)	St Anne's Roman Catholic Church
St Antony's Church	St Augustine's Church	St Barnabas Church Dalston
St Bonaventure's Catholic (Voluntary Aided)	St Elizabeth's Beacon Tree	St Gabriel's Church Aldersbrook
St Germans Terrace Association	St Helen's RC Primary School (Academy)	St Hilda's Community Centre
St Joachim's RC Primary School (Academy)	St John at Hackney Church	St John of Jerusalem Church
St John's Church	St Leonards hospital	St Luke's Church
St Mark's Church	St Mary of Eton Church	St Mary Stoke Newington
St Mary's Parish Church	St Matthias Vicarage	St Michael and All Angels Church
St Pauls Church	St Paul's Community Centre and Parish	St Peter De Beauvoir Town
St Peter's Church	St Saviours Church	St Stephen's Church
St Teresa's Catholic Church	St. Anne's Church	St. Paul and St. James Church
St. Thomas of Canterbury Church	Stagecoach	Stanmore Temple
Stansted Airport	Star Primary School	Statutory undertakers
Stewardstone Evangelical Church	Stifford Community Centre	Stratford Newtown Methodist Church
Stratford Original BID	Stratford Renaissance Partnership	Stratford School Academy (Academy)
Studio 338	Sugar Studios	Sundridge Park Working Mens Club

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Sustrans	Suzy Lamplugh Trust	Swale District Council
Swan Housing Association	Tamil Community Housing Association	Tapestry
TARA	Tarmac	Taxi Now
Teachers' Housing Association Limited	Team London Bridge	Telefonica UK Limited
Tendring	Tesco	TfL
Thames Barrier Yacht Club	Thames Boats	Thames Clipper
Thames Clippers	Thames Cruises	Thames Leisure
Thames Pleasure Cruises	Thames RIB Experience	Thames River Boats
Thames River Services	Thames Shipping	Thames Tenants and Residents Association
Thames View Christ Church	Thames Water Utilities Limited	Thames Wharf (Keltbray)
Thanet District Council	The Aldgate Partnership	The Asian Centre Waltham Forest
The Bicycle Association of Great Britain	The Bike Project	The Charlton Society
The Church of Pentecost UK	The Eltham Society	The Islamic Sharia Council
The London Legacy Development Corporation	The Montague Centre	The Motherhood Group
The O2	The Parish of Chingford	The Purple Penguin Club
The Quarter	The Redeemed Christian Church of God	The Risen Christ and All Souls Church
The Riverside Group Limited	The Rooted Forum	The Round Chapel
The Royald Docks Academy	The Warren School	The Who Cares? Trust
Thoughtistic	Thurrock Council	TLC - Thames Luxury Charters



*Consultation Report (Silvertown & Blackwall tunnels user charge)*

Tollgate Primary School	Tom Smith Close TRA	Tonbridge and Malling Borough Council
Topsail Charters	Topsail Events	Tower Hamlet Wheelers
Tower Hamlets Accessibility Forum	Tower Hamlets CCG	Tower Hamlets Clinical Commissioning Group
Tower Hamlets Committee of Local Charities	Tower Hamlets Community Housing	Tower Hamlets Community Transport
Tower Hamlets Council	Tower Hamlets Council for Voluntary Services	Tower Hamlets Faith
Tower Hamlets Federation of Tenants and Residents	Tower Hamlets Homes	Tower Hamlets Inter-Faith Forum
Tower Hamlets Mental Health Partnership Group / Community Options Involvement Network	Tower Hamlets Parents Advice Centre	Tower Hamlets Safer Transport Team
Tower Hamlets Wheelers	Tower Hamlets Family Information Service	Town and Country Housing Group
Trafalgar Estate Residents Association	Traffic Police - Barking & Dagenham, Havering, Redbridge, Newham	Transport East
Transport Focus	Transport for All	Transport for South East
Trinity Chapel	Trinity House	Trinity School
Trinity United Reformed & Methodist Church	Tunbridge Wells Borough Council	Turks Launches
U+I Morden Tenant	Uber	UCG
UK Citizens	UK Coach Operators Association	UK Power Networks
UKIM - Masjid Bilal & Islamic Centre (East Ham Branch)	UKPHD	Unite
United Kingdom Disabled People's Council	University College London	University of East London

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

University of the Third Age Bromley	Upper Clapton United Reformed Church	UpRising
UPS	Upton Cross Primary School	Urgent Services
Uttlesford	Valley Grove Residents Group	Vanbrugh Park TRA
Vicarage Primary School	Victoria Dock Entrance	Victorious Pentecostal Assembly
Victory Outreach Church	Vine United Reformed Church	Virgin Media Limited
Virginia Quay Residents Association	Viscount Cruises	Vision Redbridge Libraries
Visit Britain	Visit Chislehurst	Visit London
Visitor Economy Advisor	Vodafone Limited	Wake Up Docklands
Walk London	Waltham Forest CCG	Waltham Forest Community Hub
Waltham Forest Council	Waltham Forest Dementia Action Alliance	Waltham Forest Faith Communities Forum
Waltham Forest Islamic Association - Ghousia Masjid	Waltham Forest Mobility Forum	Waltham Forest News Waltham Forest
Waltham Forest Streets for All	Waltham Forest Family Information Service	Walthamstow Seventh Day Adventist
Walthamstow Village Residents Association	Wandle Housing Association Limited	Wanstead Baptist Church
Wanstead United Reformed Church	Wapping Bangladesh Association	Wapping Children's Centre
Ward councillors	Waterfront Studios	Waterman Building - Residents Representative
Waverley Excursions	Wealdstone Evangelical Church	Wealdstone Methodist Church
Wesleyan Christian Centre	West Ham Baptist Tabernacle	West Ham Parish Church

*Consultation Report (Silvertown & Blackwall tunnels user charge)*

West Ham United FC	Westcombe Society	Westcombe Society and Greenwich Line Users Group
Westfield	Westminster City Council	Westminster Party Boats
Wheels for Wellbeing	Whipps Cross hospital	Whiting Avenue Quarterly Action Group (WATeR)
Whizz-Kidz	Will Crooks TRA	William Davies Primary School
Winchester Road Methodist Church	Winsor Primary School	Wood Lane Baptist Church
Woodford Green United Free Church	Woodford Methodist Church	Woodford Parish Church Memorial Hall
Woodford Parish Church Of St Mary	Woodford Road Methodist Church	Woodford Spiritualist National Church
Woodgrange Baptist Church	Woodgrange Infant School	Wood's Silver Fleet
YMCA England	Young Minds	Your Bromley BID
Youth Action Diversity Trust		

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# SILVERTOWN TUNNEL

## 7.11 Charging Policies and Procedures

### TR010021

APFP Regulation 5(2)(q)

Revision 3

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

April 2017

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## Silvertown Tunnel

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# Charging Policies and Procedures

## 7.11

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Planning Act 2008

Infrastructure Planning

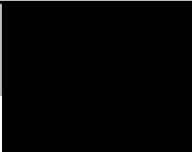
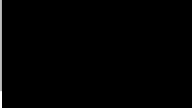
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Regulations 2009

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3	05/04/2017	David Rowe (TfL Lead Sponsor)		Update at Deadline 6



## Contents

<b>List of Abbreviations.....</b>	<b>7</b>
<b>Glossary of Terms.....</b>	<b>8</b>
<b>1. INTRODUCTION .....</b>	<b>10</b>
1.1 TfL and the Scheme.....	10
1.2 Purpose of the Charging Policies and Procedures document.....	11
1.3 Charging Policies and Procedures, Monitoring and Mitigation Strategy and Bus Strategy .....	11
<b>2. OBJECTIVES OF USER CHARGING .....</b>	<b>14</b>
2.1 Achieving the Project Objectives.....	14
2.2 How user charging helps to achieve the Project Objectives.....	15
2.3 Mayoral review of the Scheme.....	17
<b>3. SETTING AND VARYING THE USER CHARGES .....</b>	<b>19</b>
3.1 The Assessed Case user charges .....	19
3.2 Setting the initial user charges .....	19
3.3 Subsequent variations to the user charges .....	20
3.4 The User Charging Assessment Framework (UCAF) .....	21
<b>4. PROCEDURE FOR SETTING AND VARYING THE USER CHARGES.....</b>	<b>25</b>
4.1 Setting the initial charge in the context of the M&MS and the Bus Strategy 25	
4.2 Setting the initial charge.....	28
4.3 Subsequent variations to the user charges .....	30
4.4 Publishing the Statement of Charges.....	32
4.5 Occasional variations for inflation.....	32
4.6 Temporary suspension and changes to user charges.....	32
<b>5. 12 MONTH REVIEW OF USER CHARGES.....</b>	<b>34</b>
5.1 Review of user charges.....	34
5.2 Context of the review .....	34
5.3 Nature of the review .....	35
5.4 Procedure for the review .....	35
<b>APPENDIX A. FORM OF STATEMENT OF CHARGES .....</b>	<b>37</b>

**APPENDIX B: ASSESSED CASE USER CHARGES ..... 39**

**APPENDIX C. USER CHARGING ASSESSMENT FRAMEWORK ..... 41**

**List of Figures**

Figure 1-1: The relationship between the Charging Policies and Procedures, Monitoring and Mitigation Strategy and the Bus Strategy..... 13

Figure 4-1: Process for setting the initial user charges in the context of the M&MS and the Bus Strategy..... 27

Figure 4-2: Process for setting the initial user charges..... 30

Figure 4-3: Process for varying the user charges..... 31

## List of Abbreviations

DCO	Development Consent Order
MTS	Mayor's Transport Strategy
STIG	Silvertown Tunnel Implementation Group
TfL	Transport for London

## Glossary of Terms

<p>Assessed Case</p>	<p>Scenario adopted for assessment of likely effects of the proposed scheme, in the context of central forecasts of transport conditions and with user charges set so as to balance the Scheme's traffic, environmental, socio-economic and financial objectives.</p>
<p>Blackwall Tunnel</p>	<p>An existing road tunnel underneath the River Thames in east London, linking the London Borough of Tower Hamlets with the Royal Borough of Greenwich, comprising two bores each with two lanes of traffic.</p>
<p>ProjectCo (Project Company)</p>	<p>A Project Company is typically a consortium of private sector companies, formed for the specific purpose of providing the services under a private finance contract. This is also technically known as a Special Purpose Vehicle (SPV).</p> <p>The Project Company will obtain funding to design and build the new facilities and then undertake routine maintenance and capital replacement during the remainder of the contract period. The total contract period is typically 30 years.</p> <p>The Project Company will repay funders from payments received from TfL during the post construction period of the contract. Receipt of payments from TfL will depend on the ability of the Project Company to deliver the services in accordance with the output specified in the contract."</p>

The Scheme / Silvertown Tunnel	Proposed new twin-bore road tunnels under the River Thames from the A1020 in Silvertown to the A102 on Greenwich Peninsula, East London.
User charge	The charge to be paid by users of the Silvertown Tunnel and Blackwall Tunnel that is to be imposed in order to manage traffic demand and help pay for the Scheme.

# 1. INTRODUCTION

## 1.1 TfL and the Scheme

- 1.1.1 Transport for London (TfL) is a statutory body created by the Greater London Authority Act 1999 (GLAA). Section 141 of the GLAA imposes on the Mayor of London a general duty to develop and apply policies to promote and encourage safe, integrated, efficient and economic transport facilities and services to, from and within London. TfL is responsible for delivering these services on the Mayor's behalf.
- 1.1.2 TfL is also the statutory highway and traffic authority for the Transport for London Road Network (TLRN), and is responsible for the maintenance, management and operation of traffic signals throughout London. TfL has a network management duty under the Traffic Management Act 2004 which requires it to make sure road networks are managed effectively to minimise congestion and disruption to vehicles and pedestrians.
- 1.1.3 The Silvertown Tunnel Scheme (the Scheme) involves the construction of a twin bore road tunnel providing a new connection between the A102 Blackwall Tunnel Approach on the Greenwich Peninsula (Royal Borough of Greenwich) and the Tidal Basin roundabout junction on the A1020 Lower Lea Crossing/Silvertown Way (London Borough of Newham).
- 1.1.4 The Scheme includes the introduction of free-flow user charging on both the Blackwall Tunnel (northern portal located in London Borough of Tower Hamlets and southern portal in the Royal Borough of Greenwich) and at the new Silvertown Tunnel. This measure plays a fundamental role in managing traffic demand and supporting the costs of the construction and operation of the Silvertown Tunnel.
- 1.1.5 The Scheme is the subject of an application for a Development Consent Order (DCO) under the Planning Act 2008. As well as authorising the construction of the new tunnel, the DCO provides the powers to impose charges on users of the Blackwall and Silvertown Tunnels and to enforce the collection of those charges.

## **1.2 Purpose of the Charging Policies and Procedures document**

- 1.2.1 The DCO confers a general power on TfL to impose charges on vehicles using the Silvertown Tunnel and the Blackwall Tunnel. The power allows TfL to:
- set the initial user charges prior to the Scheme opening to traffic;<sup>1</sup>
  - keep the charges under review; and
  - vary the charges.
- 1.2.2 The power encompasses all aspects of the user charges including setting the charge levels and stipulating the hours during which the charge shall apply, the vehicles charged, the discounts and exemptions granted and other criteria.
- 1.2.3 Article 52 of the DCO requires that the user charging power must be exercised by TfL in accordance with this Charging Policies and Procedures document. In particular, this document sets out how TfL must set and vary the user charges in accordance with a consistent set of principles and objectives as a means of achieving the Project Objectives (see section 2.1). The specific policies which TfL must comply with are clearly numbered and identified in text boxes throughout this document. The accompanying text provides the context for these policies.
- 1.2.4 This document also sets out the formal procedures that apply when TfL sets and varies the user charges. These are also identified in text boxes.
- 1.2.5 The applicable charges (including the charge levels, the hours charged, the vehicle charges, discounts and exemptions granted and other factors related to user charging) will be set out in writing in the Statement of Charges that will be published in advance by TfL whenever the charges are set or varied.

## **1.3 Charging Policies and Procedures, Monitoring and Mitigation Strategy and Bus Strategy**

- 1.3.1 The Charging Policies and Procedures document interreacts with the Monitoring & Mitigation Strategy (M&MS) and the Bus Strategy.
- 

<sup>1</sup> This is the date when the Silvertown Tunnel opens. From this time user charges would apply at both it and the Blackwall Tunnel.

1.3.2 The main functions of the three documents are as follows:

- Charging Policies and Procedures –sets out the principles according to which TfL must set and vary the user charges and the procedures that apply when doing so.
- Monitoring and Mitigation Strategy – sets out the scope of monitoring of Scheme impacts that TfL will undertake and the processes for determining and implementing appropriate mitigation for any localised traffic and traffic-related impacts.
- Bus Strategy – sets out the commitments which TfL will fulfil in developing bus services prior to Scheme opening and in reviewing and modifying services.

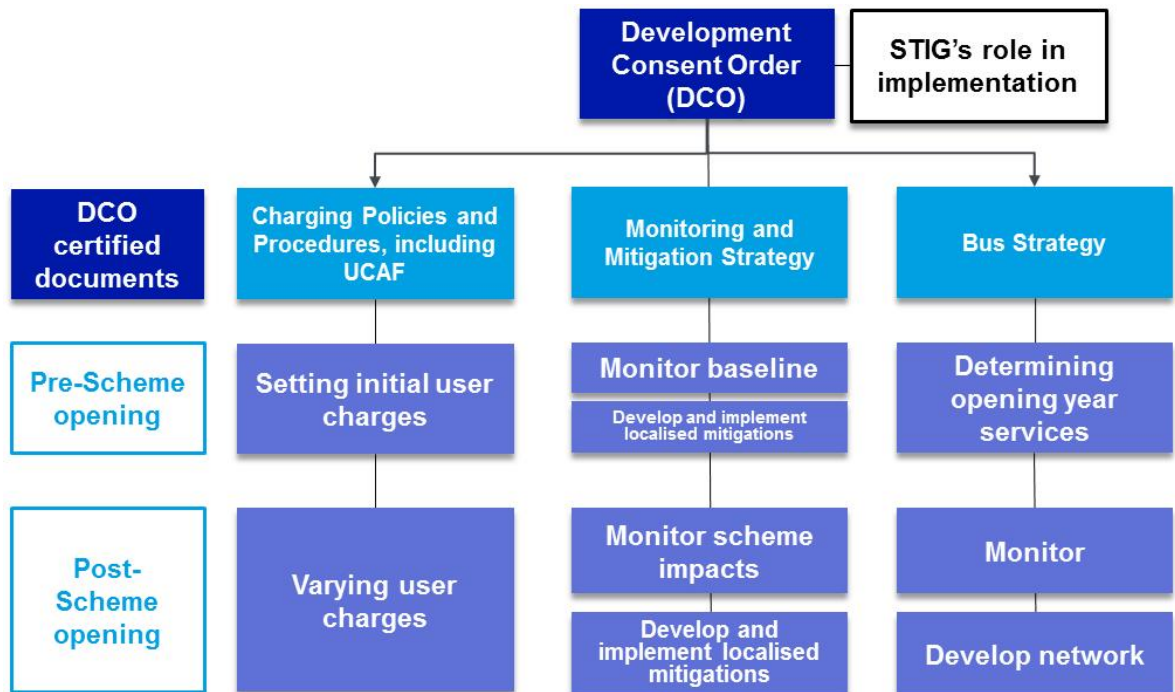
1.3.3 Compliance with the obligations in each of these documents is secured by requirements in Schedule 2 to the DCO and, in the case of the Charging Policies and Procedures, by article 52 of the DCO.

1.3.4 The DCO provides a role for members of the Silvertown Tunnel Implementation Group (STIG) in relation to the operation of each of these documents. The role and responsibilities of STIG are explained in each of these documents.

1.3.5 The function of each of the three documents is illustrated in Figure 1-1 below.



**Figure 1-1: The relationship between the Charging Policies and Procedures, Monitoring and Mitigation Strategy and the Bus Strategy**



1.3.6 The M&MS applies from three years prior to the Scheme opening for public use and for three years following the Scheme opening for public use, with the potential to be extended by a further two years. The Bus Strategy and the Charging Policies and Procedures apply for the life of the Scheme.

## 2. OBJECTIVES OF USER CHARGING

### 2.1 Achieving the Project Objectives

2.1.1 Proposal 130 of the Mayor's Transport Strategy 2010 (MTS) states that pricing incentives may be considered to manage demand provided they achieve a reasonable balance between objectives, costs and impacts. It also states that the Mayor can use charges to support specific infrastructure projects such as river crossings.

2.1.2 The Scheme has been developed in line with Proposal 130. User charges are an essential component of the Scheme and are required to deliver the Project Objectives<sup>2</sup>, which are as follows:

- PO1: to improve the resilience of the river crossings in the highway network in east and southeast London to cope with planned and unplanned events and incidents;
- PO2: to improve the road network performance of the Blackwall Tunnel and its approach roads;
- PO3: to support economic and population growth, in particular in east and southeast London by providing improved cross-river transport links;
- PO4: to integrate with local and strategic land use policies;
- PO5: to minimise any adverse impacts of any proposals on communities, health, safety and the environment;
- PO6: to ensure where possible that any proposals are acceptable in principle to key stakeholders, including affected boroughs; and
- PO7: to achieve value for money and, through road user charging, to manage congestion.

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<sup>2</sup> Silvertown Tunnel, the Case for the Scheme, TfL, 2016

Policy 1: TfL must impose user charges at the Silvertown and Blackwall Tunnels to the extent that it is necessary or expedient to achieve the Project Objectives.

Policy 2: In setting and varying the user charges (including the charge levels, the hours charged, the vehicles charges, discounts and exemptions granted and other factors related to user charging), TfL must ensure that they are fair, justified and will not undermine the Project Objectives.

Policy 3: TfL will use its power to set and vary the charges as a means to help fulfil its wider road network management duty under the Traffic Management Act 2004<sup>3</sup>. Overall, in setting and varying the user charges, TfL will seek to manage traffic demand at the Blackwall and Silvertown Tunnels and make efficient use of the road network including other river crossings and to reduce congestion.

Policy 4: TfL must set and vary the user charges in accordance with applicable legislation, the MTS and other relevant policies.

## **2.2 How user charging helps to achieve the Project Objectives**

- 2.2.1 The primary purpose for the user charges is to manage traffic demand for the river crossing. By managing this traffic demand, the other effects of the Scheme can be effectively managed and the Project Objectives met.
- 2.2.2 A secondary reason for the user charge is to provide a means of helping to pay for the design, construction and operation of the Scheme (as set out in PO7). Charging will generate a relatively stable long-term source of revenue that will support both the servicing and repayment of construction finance and ongoing operation and maintenance costs. Suitable alternative means of paying for the Scheme are not available and, crucially, would not incorporate the demand management effect of the user charges.
- 2.2.3 Without a user charge, the benefits of additional capacity put in place by the new tunnel would be short-lived, as the enhanced attractiveness of the route

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<sup>3</sup> TfL's network management duty under the Traffic Management Act 2004 requires it to make sure road networks are managed effectively to minimise congestion and disruption to vehicles and pedestrians

via the tunnels could attract additional traffic to the point where queues initially relieved could return to their former levels.

- 2.2.4 This would lead to there still being significant delays at the crossing and continued adverse impacts on the wider road network in terms of congestion, journey time and journey time reliability. This in turn would undermine the resilience benefits brought about by having an additional tunnel. The imposition of a user charge for both tunnels is, accordingly, directly related to the achievement of PO1, PO2 and PO7; and instrumental in the achievement of objectives PO3 to PO6.
- 2.2.5 The threat of additional traffic can be managed effectively through the imposition of the user charge, which will act to suppress demand and is thereby a powerful and flexible tool to ensure that the benefits of the additional crossing capacity delivered by the Scheme are secured. In this way, the user charges act as an 'embedded mitigation' for any adverse traffic and associated environmental impacts that the Scheme might otherwise give rise to (PO5).
- 2.2.6 Setting a charge means that drivers (and potential drivers) must decide if they are willing to pay to make this journey and if not, respond by switching to another mode, changing the time or route of their journey or by not making the journey at all.
- 2.2.7 If no charge were applied, the Scheme would give rise to secondary adverse impacts in terms of the economy, environment and public transport (PO3). Businesses would continue to experience journey time delay and unreliability with regard to their use of the crossing. The opportunity to run more and better public transport would be lost if demand is not managed at the Silvertown and Blackwall Tunnels, as certainty about journey times is paramount if bus and coach services are to operate effectively and attract customers.
- 2.2.8 As demonstrated by the Assessed Case (which is described in section 3.1 below), the imposition of the charge as a component part of the Scheme in operation will effectively eliminate the current severe congestion and delay at the crossing, without significantly changing the scale of cross-river vehicle movements. This will significantly improve the crossing's resilience to traffic incidents that cause delays and enable the optimisation of the performance of the local road network. In this way, the user charges ensure that the benefits of the additional river crossing capacity generated by the Scheme (as described in the Project Objectives) are 'locked in' for the long-term.

2.2.9 The user charges are the principal means by which mitigation of the adverse environmental impacts of the Scheme can be delivered (PO5). If not properly managed, traffic can have adverse air quality, noise and other environmental impacts. By controlling traffic demand via the user charges, these can be mitigated. The user charges not only control the level of demand but can help to incentivise the use of less-polluting vehicles, for example.

### **2.3 Mayoral review of the Scheme**

2.3.1 On becoming Mayor of London in 2016, Sadiq Khan undertook a review of TfL's approach to river crossings in east London. In concluding this review, the Mayor affirmed his support for the Scheme and announced various enhancements to it.

2.3.2 One of these enhancements is an incentive for residents of the host boroughs<sup>4</sup> to register for an account for payment of user charges. This has advantages in terms of making the user charges easier to pay and removing the risk of incurring penalties for non-payment. Account registration also enables access to reduced user charges.

2.3.3 Normally, an annual registration fee will apply on setting up and making an annual renewal of the registration. For residents in the host boroughs a temporary waiving of the registration fee will apply for the initial year.

2.3.4 As a further enhancement, a temporary waiving of the registration fee will also apply for small local businesses in the initial year<sup>5</sup>.

Policy 5: for a period of not less than 56 days prior to Scheme opening, eligible residents and small businesses in the host boroughs will be able to register online for a payment account without paying the annual registration fee for the initial year.

2.3.5 Additionally, the Mayor announced a discount for host borough residents on a low income. Although this group has an overall benefit from the Scheme owing to the enhanced public transport which it enables, there will be a small number of low income users who continue to make cross-river trips by car (for example to get to work), and who may be adversely affected by the user charges.

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<sup>4</sup> The London boroughs of Newham and Tower Hamlets, and the Royal Borough of Greenwich

<sup>5</sup> This is secured by means of a legal agreement with the host boroughs.

2.3.6 It is impractical to set out, several years in advance of the Scheme opening, a precise description of this discount or its eligibility criteria. However, any discount should be directed at those most in need and be easily implementable. TfL currently provides a concessionary travelcard for London residents in receipt of certain benefits. This entitles people in receipt of Income Support, Jobseekers' Allowance or Employment and Support Allowance to claim a 50% discount on bus and tram services.

2.3.7 TfL will adopt a similar approach in providing a discount on the user charges at the Blackwall and Silvertown Tunnels. Similar eligibility criteria as are used for this concessionary travelcard could apply; and a discount of not less than 50% on the user charges will be applied for eligible users. TfL will work with the host boroughs in developing the the level of discount and the eligibility criteria.

Policy 6: for the duration of the monitoring period a discount of not less than 50% on the user charges will be available for eligible residents of host boroughs on a low income who register for an online account with TfL.

After the expiry of the monitoring period, TfL will review in consultation with the host boroughs whether the discount should continue.

2.3.8 The 'monitoring period' referred to in Policy 6 means a period of not less than three years commencing on the date the Silvertown Tunnel opens for public use. The monitoring period may be extended by TfL for up to two years if this is deemed necessary following consultation with the members of STIG. See section 3.4 of the Monitoring and Mitigation Strategy.

## 3. SETTING AND VARYING THE USER CHARGES

### 3.1 The Assessed Case user charges

- 3.1.1 Prior to submitting the DCO application, TfL assessed a range of user charging scenarios in order to identify one which would best meet the Project Objectives in the conditions forecast to exist when the Scheme opens. This included an assessment of the extent to which different charging scenarios enabled effective demand management (and the associated economic and environmental impacts of this demand) and resulted in sufficient revenue to pay for the Scheme. An assessment of a zero charge was also undertaken.
- 3.1.2 In carrying out this assessment, TfL measured the likely impacts of different user charging scenarios on a range of metrics which are directly related to the Project Objectives. An example of such a metric is the effect on demand at the Blackwall and Silvertown Tunnel, which is important for achieving PO1 and PO2.
- 3.1.3 The scenario (S153) which was shown to deliver an effective balance of positive results against all these assessed areas was then used to develop the Assessed Case for the DCO application. The Assessed Case user charges are set out at Appendix B.

### 3.2 Setting the initial user charges

Policy 7: TfL must set initial user charges prior to the Silvertown Tunnel opening for public use.

- 3.2.1 TfL has set out its forecast of what these initial user charges will be in the Assessed Case, and these will be the starting point in the setting of the initial user charges.
- 3.2.2 However, there are several years until Scheme opening, and before setting the initial user charges, it will be important to refresh the assessment in order to determine what the charges should be, in the context of the M&MS and the Bus Strategy. This procedure is described in Chapter 4.

Policy 8: Before setting the initial user charges, TfL will update its modelling using up-to-date inputs and the outputs of this modelling will be used to determine whether any changes to the Assessed Case user charges are required to more effectively deliver the Project Objectives.

- 3.2.3 In order to determine how well the proposed user charges meet the Project Objectives, a User Charging Assessment Framework (UCAF) has been

developed. This is reproduced at Appendix C, and is explained in section 3.4 below, and provides a means of assessing potential user charges against the Project Objectives. The UCAF formalises the method which was used in developing the Assessed Case user charges, thereby ensuring consistency in the approach to charge-setting. This is explained in more detail below.

Policy 9: The extent to which the user charges will assist in achieving the Project Objectives is the primary consideration which TfL will have regard to when setting the initial user charges.

- 3.2.4 The likely environmental effects of the Scheme have been assessed as set out in the Environmental Assessment (ES).

Policy 10: TfL will set the initial charges at a level and subject to conditions so that the Scheme in operation is not likely to give rise to materially new or materially different environmental effects to those reported in the ES.

- 3.2.5 For the purposes of Policy 10, the Scheme shall be deemed not to give rise to materially new or materially different environmental effects if the significance of the effect reported for each topic, taking account of any necessary mitigation, is the same as or better than the level of significance reported against that topic in the ES. In this context, 'the ES' means the documents of that description set out in Schedule 14 to the DCO.

### **3.3 Subsequent variations to the user charges**

- 3.3.1 To ensure the user charges remain effective over time, TfL will keep the charges under review and make variations where this is necessary in response to changing conditions to ensure the continued achievement of the Project Objectives.

Policy 11: TfL must keep the user charges under review, and will make variations to charges where this is considered necessary to ensure the continued achievement of the Project Objectives.

- 3.3.2 TfL will consider the extent to which any proposed variations to the user charges will help to deliver the Project Objectives. This will be done using the User Charging Assessment Framework (UCAF) which will be updated as necessary to take account of other traffic, environmental, and socio-economic factors which are relevant at the time of the proposed variation, including the results of monitoring.



Policy 12: The extent to which the user charges will assist in the continued achievement of the Project Objectives is the primary consideration which TfL will have regard to when reviewing and varying the user charges.

In considering whether any proposed variations to the charges will assist the delivery of the Project Objectives, TfL will consider the likely impacts of the proposed variation on traffic, the environment, population, economy and growth and other factors which are relevant to the Project Objectives. TfL will also consider the extent to which the proposed variations assist TfL to comply with its statutory functions and other relevant policies and legislation.

### **3.4 The User Charging Assessment Framework (UCAF)**

3.4.1 The UCAF will be used both in setting the initial user charges and in making subsequent variations (according to the procedures set out in Chapter 4). The UCAF enables TfL to assess the extent to which proposed user charges are likely to:

- achieve the Project Objectives
- enable TfL to fulfil its other duties, including:
  - i. TfL's network management duty under the Traffic Management Act 2004
  - ii. Compliance with other relevant legislation.

3.4.2 The UCAF lists each Project Objective and one or more indicative metrics for determining the extent to which this Project Objective is met in the assessment. The metrics presented in the UCAF are considered to be appropriate at the present time, but these could be amended or expanded in the future to take account of changes in policy, environmental factors or other relevant considerations.

3.4.3 The final row in the UCAF relates to the compatibility of the proposed user charges with any air quality mitigation which has been put in place in accordance with the provisions of the M&MS.

3.4.4 The considerations listed in the UCAF will be taken into account when TfL is setting the initial charges or considering making changes to any element of the user charges. Such changes could include a decrease or increase of overall charge levels by vehicle type, changes to peak and off-peak periods, changes to charging hours, changes to discounts and exemptions and other variables. Monitored data collected under the Monitoring and Mitigation

Strategy will be an important input for the UCAF as described in section 3.1 of the M&MS.

- 3.4.5 As described in section 4, TfL and STIG will consider the results of the Framework as part of the procedure for setting the initial user charges and varying user charges. The completed UCAF will be published on TfL's website as part of a report about the decision.

Policy 13: TfL will use the UCAF to help to determine the extent to which the proposed user charges meet the Project Objectives. This will apply for both initial charge-setting and subsequent variations.

### **Relevant Factors**

- 3.4.6 The UCAF provides a means of assessing potential user charges with regard to their impact on the Project Objectives and on the factors listed in section 3.2 and section 3.2.5 above which are relevant both in setting the initial user charges and in making variations: traffic, environment and population, economy and growth. This section summarises how the UCAF will work in this respect. It is worth noting here that the environmental and socio-economic effects of the Scheme are largely a function of traffic flows and composition and the UCAF accordingly contains several metrics for these.

### **Traffic**

- 3.4.7 In the UCAF, a number of traffic metrics are included for the section related to the achievement of PO1 and PO2. These metrics relate to adjacent crossings and local roads as well as the Blackwall and Silvertown Tunnels: it is important that the wider impacts of the Scheme's user charges are considered in decision-making. These metrics relate to the ability of the user charge to manage demand for the crossing.
- 3.4.8 TfL will have regard to the effects on the demand for the Silvertown and Blackwall Tunnels (including changes in traffic flow, congestion and delay) and on the management of traffic and transport on the wider network.
- 3.4.9 In addition to the traffic metrics described, the UCAF contains a section on the fulfilment of TfL's other duties. This is intended to recognise that the Scheme is part of the wider road network in London for which TfL has a strategic responsibility; the current and likely future context of this network will be important in making decisions related to the user charges.

### **Environment**

3.4.10 Project Objective 5 concerns the environmental impacts of the Scheme. The UCAF includes several potential metrics for the assessment of how well the user charges help to meet PO5. The metrics relate to the environmental topics which are most likely to be directly affected by the user charges – air quality, noise, socio-economic and safety. There are a range of potential metrics which could be used here and those given in the UCAF are indicative.

3.4.11 In setting or varying charges TfL will seek to minimise any adverse impacts on the environment, including health and equalities. In considering these impacts, TfL will have regard to relevant legislation and strategies, including the national and Mayor's air quality strategies.

### **Population, economy and growth**

3.4.12 PO3 concerns the impacts of the scheme on businesses, access to employment and public transport. The connectivity benefits of the Scheme will increase the number of people who can access employment in the east and south east subregion, and by making journey times shorter and more reliable, improve conditions for businesses in the area. The provision of reliable public transport in the form of buses through the Silvertown Tunnel is especially important in improving access to jobs and services, and the Scheme enables a step-change in cross-river bus services.

3.4.13 TfL will consider the likely effects of the proposed charge in supporting the performance of the local economy, the ability of residents to access employment opportunities and the delivery of new housing. TfL will have regard to planning policy set out in the London Plan and the Local Plans of the Royal Borough of Greenwich, the London Borough of Newham and the London Borough of Tower Hamlets and any policies or proposals set out in the Mayor's Transport Strategy.

3.4.14 Overall, TfL will seek to facilitate planned economic development in east and south-east London by enhancing cross-river connectivity to enable businesses and residents to undertake essential movements by road more efficiently.

### **Other considerations (POs 4, 6 and 7)**

3.4.14 The secondary reason for the user charge, its ability to generate revenue to pay for the Scheme, is assessed under PO7. TfL is proposing to deliver the Scheme under a Public Private Partnership (PPP), where the ProjectCo will be responsible for the detailed design, construction and operation of the Silvertown Tunnel for a period of 25

years. One of the principal uses of the revenue from the user charges is to make payments to the ProjectCo over this period. Other sources of funding are not available and therefore it is important that the user charges are set and varied in a way which fulfils this arrangement.

- 3.4.15 In considering the initial user charges and potential variations, TfL will consider the extent to which these affect the ability to pay for the Scheme.
- 3.4.16 Project Objectives 4 and 6, which relate to the fit with land-use policies and stakeholder views respectively, are less directly influenced by the user charges than the other Project Objectives. The UCAF includes an appraisal against these objectives and it is expected that a qualitative appraisal, with STIG's input, is undertaken.

## 4. PROCEDURE FOR SETTING AND VARYING THE USER CHARGES

### 4.1 **Setting the initial charge in the context of the M&MS and the Bus Strategy**

4.1.1 Prior to the Silvertown Tunnel opening for public use, TfL must refresh its assessment of Scheme impacts, in order to:

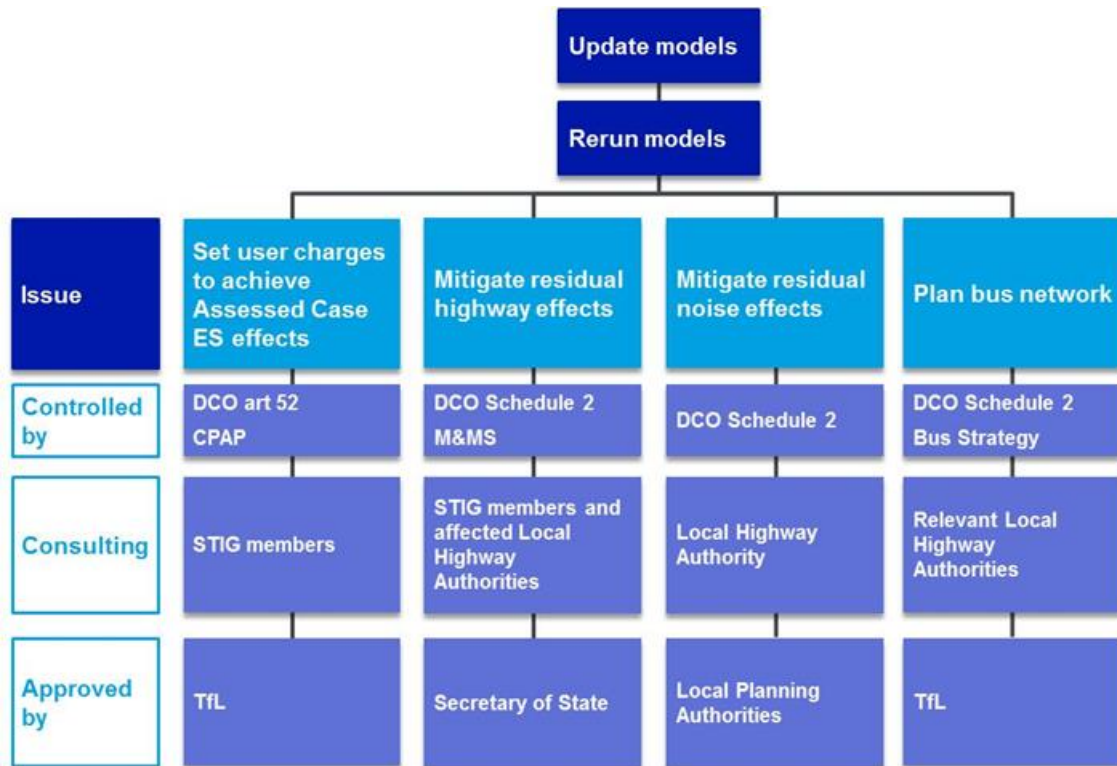
- Set the opening user charges;
- Define the requirement for and form of localised mitigation for residual effects; and
- Specify the bus network through the Silvertown Tunnel that will operate on opening.

4.1.2 For this process TfL will update the relevant transport and environmental models, rerun those models, and develop its proposals for each element in conformity with the commitments, policies and procedures set out in the relevant certified documents and any DCO requirements. The assessment will incorporate a wider range of analyses than the modelling alone.

4.1.3 Because there are interactions between each of these elements, TfL must ensure that they are developed and considered in light of one another.

4.1.4 Figure 4-1 below summarises the elements of the process and the governance arrangements applying to each.

**Figure 4-1: Process for setting the initial user charges in the context of the M&MS and the Bus Strategy**



4.1.5 This approach ensures that opening user charges, mitigation measures and the opening bus network are based on the most up to date information that is available before the Scheme opens.

4.1.6 This will result in a better outcome than specifying these aspects of the Scheme now, for the following reasons:

- The Scheme is still a number of years from implementation, with an expected opening date of 2023;
- Significant growth is expected across east and south-east London over the next few years, which could materially change background conditions (there is an inherent degree of uncertainty regarding the pace of this growth). As set out in Chapter 5 of the Transport Assessment, across the Silvertown Tunnel host boroughs (Greenwich, Newham and Tower Hamlets) the forecast growth rate in population

and employment in the period to 2021 is more than double the London average;

- Linked to this growth, the road network in this part of London is especially dynamic and will change and evolve between now and Scheme opening (with several schemes in the vicinity of the tunnels being actively considered although not presently committed; for example, Cycle Superhighway 4 and the Bow Vision scheme).

4.1.7 The refreshed assessment will not ‘replace’ the assessment which was used to identify the likely significant effects of the Scheme in the Environmental Statement (ES). Rather, it will enable TfL to have the benefit of the most up-to-date data when setting the initial user charges and identifying any implementing any mitigation measures that are necessary before the Scheme opens.

4.1.8 The Monitoring and Mitigation Strategy concerns the mitigation of residual traffic-related local effects identified as part of the refreshed assessment process undertaken prior to Scheme opening. If, through the refreshed assessment, the need for localised traffic-related mitigation measures is identified, TfL will develop these measures in consultation with STIG and submit them to the Secretary of State for approval. TfL must then implement the approved measures before the Silvertown Tunnel opens for public use, or provide funding for the relevant local highway authority to implement them.

4.1.9 Any measures required to mitigate residual noise impacts will be submitted for the approval of the local planning authority in accordance with the obligation in the ‘operational noise’ requirement set out in Schedule 2 to the DCO.

4.1.10 The data from the refreshed assessment will be used by TfL when setting the initial user charges. As these charges will have a direct bearing on the extent and scope of any mitigation measures required, it is important that any mitigation for residual effects is set in the context of these charges.

## **4.2 Setting the initial charge**

4.2.1 TfL must set initial charges before the Silvertown Tunnel opens to traffic. The process for setting the charges will commence around two and a half years in advance of Scheme opening.



Procedure 1: TfL will propose the initial user charges for the Scheme, having regard to the factors set out in section 3.2 above. TfL will follow the process set out below:

- TfL will re-run the strategic traffic model (using up-to-date data)
- TfL will use the outputs of this model run to undertake a re-assessment of the significant likely effects of the proposed initial user charges on air quality, noise, socio-economic effects, in accordance with the approach adopted in the Environmental Statement (Document Reference: 6.1)
- TfL will populate the UCAF with its impact assessment

TfL will consult with members of STIG on the proposed charges for the opening year, and present the completed UCAF. STIG members may make recommendations or representations to TfL in response to these, and the views of STIG's members will be recorded under PO6 of the UCAF.

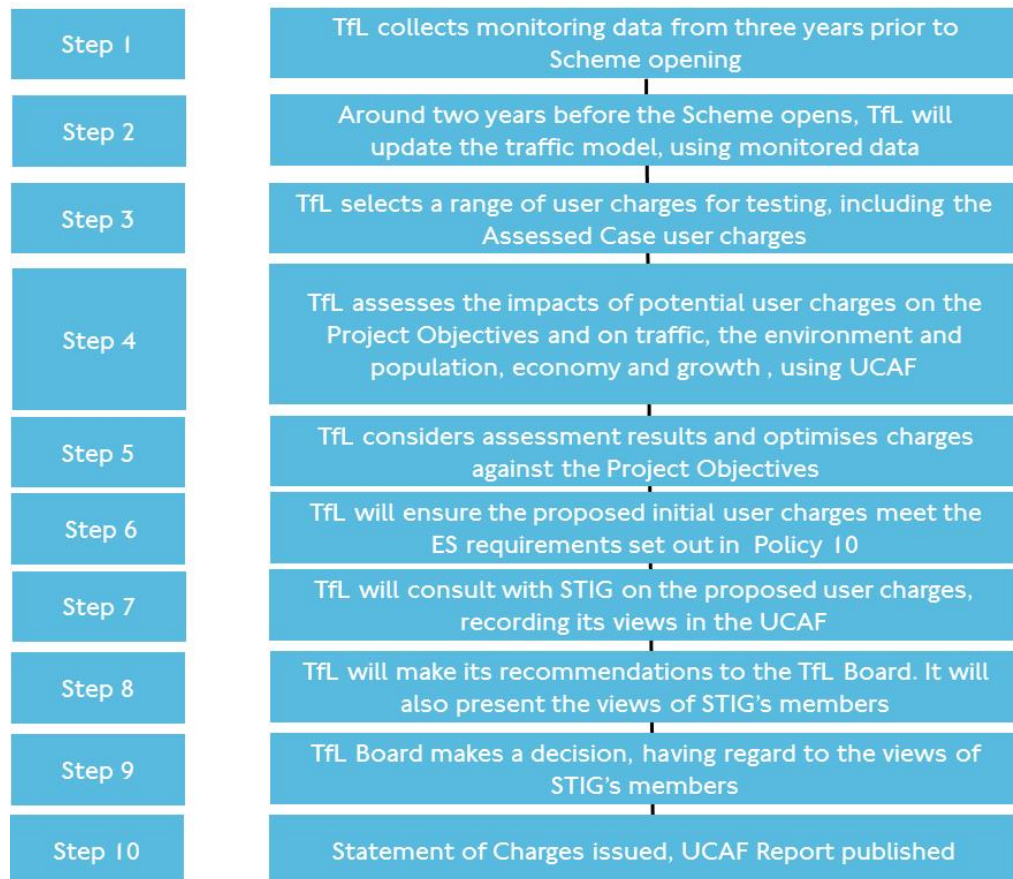
TfL will then submit the proposed charges, including setting out the recommendations and representations of STIG members, to the TfL Board for approval. When deciding whether or not to approve the proposed charges the TfL Board must:

- in accordance with article 65 of the DCO have regard to any recommendations or representations made by members of STIG; and
- only approve the charges if it is satisfied that Policies 9 and 10 are met.

4.2.2 The completed UCAF will be published on TfL's website as a record of the assessment undertaken.

4.2.3 Figure 4-2 below summarises the process for setting the initial user charges.

**Figure 4-2: Process for setting the initial user charges**



### 4.3 Subsequent variations to the user charges

4.3.1 TfL will keep the user charges under review in accordance with Policy 9 and will vary the charges when it considers it necessary and appropriate to do so, having regard to the Project Objectives and the factors set out in section 3.3 above.

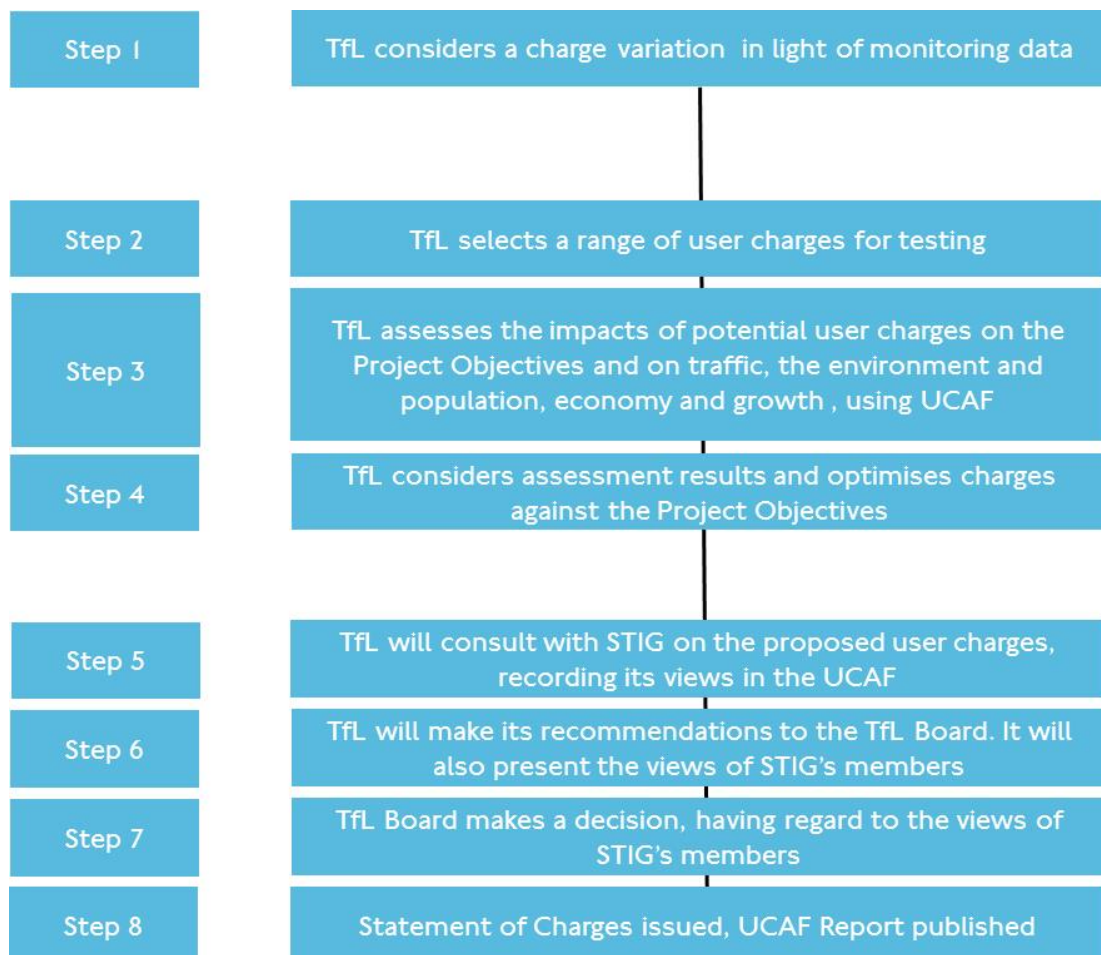
Procedure 2: In proposing variations to the user charges, TfL will use the UCAF to assess the likely impacts of variations to the charges on the achievement of the Project Objectives and other considerations. In accordance with Article 65 of the DCO, TfL will consult with members of STIG on these proposed variations who may make representations and recommendations in response.

TfL will then submit the proposed charges, including setting out the recommendations of STIG members, to the TfL Board for approval. When deciding whether or not to approve the variations the TfL Board must:

- in accordance with article 65 of the DCO have regard to any recommendations or representations made by members of STIG; and
- only approve the charges if it is satisfied that the proposed charges comply with Policy 12.

4.3.2 Figure 4-3 below summarises the process for varying the user charges.

**Figure 4-3: Process for varying the user charges**



#### **4.4 Publishing the Statement of Charges**

- 4.4.1 In accordance with Article 53 of the DCO, where the TfL Board decides to approve the proposed charges (for the initial charge and for subsequent variations), TfL must publish a Statement of Charges describing the charges in the form set out in Appendix A to this document or in a form to the like effect. The Statement will set out the date from which the charges take effect.
- 4.4.2 DCO Article 53 requires TfL to publish a Statement of Charges no less than 56 days before it comes into effect. TfL will endeavour to provide more notice than specified by this minimum period, and may publish a Statement of Charges up to six months in advance of the initial charges taking effect, and up to three months prior to the date on which any subsequent variations to the user charges take effect.
- 4.4.3 TfL will publish the Statement of Charges on its website and use other channels as appropriate in order to publicise the user charges.

Procedure 3: TfL will publish a Statement of Charges setting out the user charges no less than 56 days before the user charges come into effect.

#### **4.5 Occasional variations for inflation**

- 4.5.1 Separate to variations occasioned by TfL's continual review, the charge may be varied from time to time to account for inflation<sup>6</sup>. This variation will include changes to associated charges such as penalty charges and registration fees as well as the user charges themselves. This change will not be subject to the assessment and approval processes outlined in sections 4.1 - 4.3 above.

Procedure 4: Each time the charges are varied to take account of inflation TfL will publish a new Statement of Charges setting out these new charges in accordance with section 4.4 above and Article 53 of the DCO.

#### **4.6 Temporary suspension and changes to user charges**

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<sup>6</sup> Using the Retail Price Index (RPI)

- 4.6.1 Occasionally, planned events (such as roadworks) may necessitate a temporary change or waiver of the user charges. Additionally, unplanned incidents (such as traffic collisions) may also mean that a change or waiver of the user charges is necessary.

Policy 14: TfL may impose a temporary suspension or variation of charges where it considers it necessary to do so. Such a suspension would be advertised in advance on TfL's website.

TfL may, without notice, impose a temporary suspension or variation of user charges in response to emergencies or unplanned incidents on the highway network.

## 5. 12 MONTH REVIEW OF USER CHARGES

### 5.1 Review of user charges

5.1.1 In accordance with Policy 11 TfL will keep the user charges under review for the lifetime of the Scheme.

5.1.2 In addition to this requirement, TfL will undertake a review of the user charges once the Scheme has been operational for 12 months. This review will consider observed data related to the performance of the Scheme with regard to traffic at the crossing and other locations including adjacent crossings. This review will provide a timely opportunity for TfL to check that the Scheme is performing broadly in accordance with the forecasts set out in the refreshed traffic modelling undertaken prior to setting the initial user charges (as described at section 4.2 above).

Policy 15: TfL must complete a review of the user charges not later than 15 months after the Scheme opens for public use and, if necessary, must revise the charges to mitigate any significant adverse impacts attributable to the Scheme which were not predicted in the pre-opening assessment.

5.1.3 If the review required under Policy 15 necessitates a revision to the user charges, the procedure described in section 4.3 of this document will be followed.

5.1.4 The fixed-term review required under Policy 15 does not prejudice TfL's ability to make changes to the user charges in the period prior to and following this 12 month review if this is deemed necessary in accordance with the other requirements set out in this document.

### 5.2 Context of the review

5.2.1 This 12 month review will utilise the monitoring regime put in place by the Monitoring and Mitigation Strategy (M&MS) for the Scheme. By the time of the review, three annual monitoring reports will have been published as well as quarterly reports in the first year of operation. The 12 month review will benefit from data which has been collected for these reports.

5.2.2 The commitments to mitigation that TfL is making in the M&MS mean that opportunities to respond to the impacts of the Scheme exist:

- prior to Scheme opening,

- post-opening before the 12 month review
- at the point of the 12 month review
- for three years following Scheme opening

5.2.3 These mitigations are potentially in the form of adjustments to the user charge and localised measures.

### **5.3 Nature of the review**

5.3.1 The review will consider data related to traffic at the Blackwall and Silvertown Tunnels, adjacent crossings and diversion routes (as set out in the M&MS). By the time of the review, some 12 months of observed data will have been collected and processed, providing a reliable and settled overview of the Scheme's performance with regard to traffic.

5.3.2 The use of traffic data has been selected on the basis that traffic-related impacts can be clearly attributed to the Scheme, can be readily collected and verified, and, although it relates most closely to Project Objectives 1 and 2, serves as a broad indicator of meeting the other Project Objectives. The purpose of the review is to check that the user charges set for the opening of the Scheme are resulting in the Scheme performing broadly as expected.

5.3.3 It should be noted, however, that a wide range of metrics related to all of the Project Objectives and covering traffic, environment and socio-economic effects will have been considered in setting the initial user charges, and will be considered in making any subsequent variations (including any variation occasioned by the findings of the 12 month review).

### **5.4 Procedure for the review**

Procedure 5: TfL will analyse around 12 months of observed post-Scheme opening data, comparing it to observed conditions recorded prior to the Scheme opening

TfL will consider the data in the context of the wider monitoring programme, planned and implemented mitigations and the situation on the network overall. TfL will develop a proposal in response to the analysis, which could include:

- initiating the procedure to change the user charges
- initiating the process for mitigations
- further investigation of data, including data for additional metrics
- no further action

TfL will consult on its proposed response with members of STIG. Members of STIG may make representations in response to TfL's proposal. The decision on the response to the review will be made by TfL. TfL will publish a report summarising the review and its outcome.



## APPENDIX A. FORM OF STATEMENT OF CHARGES

### Interpretation

1. *[insert appropriate definitions].*

### Tunnels subject to charge

2. *[Describe the tunnels in respect of which charges are imposed. This may be in words or by reference to a plan].*

### Classes of vehicles subject to charge

3. (1) Charges are imposed in respect of all motor vehicles except exempt vehicles.

### Exemptions

4. Vehicles falling within any of the following classes are exempt vehicles:

*[Set out the classes of vehicles which are not subject to charges].*

### Discounts

5. The following discounts are available:

*[Set out the applicable discounts, expressed as a %].*

### Amount of charge

6. *[Insert details of the charges payable. These may vary according to matters including the day, the time of day, the class of vehicle etc. The basis on which variable charges are applied should be set out below].*

### Payment means or method

7. *[Insert details of the methods available to pay the charges].*

### Documents or equipment

8. *[Insert details of any documents or equipment needed in order to pay the charges].*

### Penalty charge for non-payment of charge

**9.** *[State where penalty charges are imposed for non-payment of charges and the amount of charges including reduction for prompt payment].*

### **Immobilisation of vehicles**

**10.** *[State the circumstances in which a vehicle may be immobilised on account of non-payment of penalty charges and amount of penalty charge for release from immobilisation devices].*

### **Removal of vehicles**

**11.** *[State the circumstances in which a vehicle may be removed on account of non-payment of penalty charges and amount of penalty charges for removal, storage and disposal of vehicle].*

### **Payment of charges and penalty charges**

**12.** *[Set out the ways in which and the times at which charges and penalty charges may be paid, including payment through accounts, by credit card and refunds].*

### **Commencement and duration**

**13.** *[State when the charges set out in this Statement of Charges come into effect and their duration].*

## APPENDIX B: ASSESSED CASE USER CHARGES

<b>Charge per trip in 2015 prices (during charging hours: 6am to 10pm)</b>			
User type	Account-holder		Non account-holder
Charge rates	Off-peak charge	Peak charge	Headline charge
Time	Weekdays <b>outside peak period</b> and at all times on weekends	Weekday <b>peak periods</b> between 6-10am going northbound <b>and</b> 4-7pm southbound	At all times
Motorcycle, moped, motor tricycle	£1.00	£2.00	£3.00
Car and small van	£1.00	£3.00	£4.00
Large van	£1.65	£5.00	£6.00
HGVs	£4.00	£7.50	£8.50
Bus, coach, minibus	Zero charge (100% discount)		

<b>Discounts and Exemptions (assumed in the Assessed Case)</b>
<b>100% Discount</b>
Recovery and accredited breakdown vehicles
Buses, coaches and minibuses
Blue Badge holders
Low emission vehicles
Selected Partner vehicles
Taxi and Private Hire Vehicles
NHS Patient Reimbursement
<b>Exemptions</b>
Emergency services vehicles
NHS vehicles exempt from vehicle tax
Vehicles in the disabled tax class
Military vehicles

## APPENDIX C. USER CHARGING ASSESSMENT FRAMEWORK

Scope of the assessment

To be completed when applying the framework e.g. An assessment against the Project Objectives of the impact of increasing the off-peak charges by 50%

All metrics used in this table are indicative

<p><b>Project Objective 1: To improve the resilience of the river crossings in the highway network in east and southeast London to cope with planned and unplanned events and incidents</b></p> <p><b>AND</b></p> <p><b>Project Objective 2: To improve the road network performance of the Blackwall Tunnel and its approach roads</b></p>	
<p>Impact on traffic flow and composition at the Blackwall &amp; Silvertown Tunnels</p> <p>Impact on delay at the Blackwall &amp; Silvertown Tunnels</p> <p>Impact on journey time and journey time reliability on strategic routes</p> <p>Impact on traffic flow at nearby crossings incl. Tower Bridge, Rotherhithe Tunnel, Woolwich Ferry, Dartford Crossing</p> <p>Impact on traffic composition at nearby crossings incl. Tower Bridge, Rotherhithe Tunnel, Woolwich Ferry, Dartford Crossing</p> <p>Impact on traffic on diversion routes and local roads</p>	
<p><b>Project Objective 3: To support economic and population growth in particular in east and southeast London by providing improved cross-river transport links</b></p> <p>Impact on user benefits</p> <p>Impact on business</p> <p>Impact on the ability of residents to access employment opportunities</p> <p>Impact on public transport</p>	
<p><b>Overall Impact against Project Objectives(s)</b></p> <p><b>Project Objective 4: To integrate with local and strategic land use policies</b></p> <p>Summary of assessment in relation to integration with relevant policies</p> <p><b>Overall Impact against Project Objectives(s)</b></p>	<p>State summary outcome</p>
<p><b>Project Objective 5: To minimise any adverse impacts of any proposals on communities, health, safety and the environment</b></p> <p>Impact on emission levels (air quality) on the Blackwall &amp; Silvertown Tunnel approaches</p> <p>Impact on emission levels (air quality) on the approaches to nearby crossings incl. Tower Bridge, Rotherhithe Tunnel &amp; Woolwich Ferry</p> <p>Impact on noise levels on the approaches to nearby crossings incl. Tower Bridge, Rotherhithe Tunnel &amp; Woolwich Ferry</p> <p>Impact on emission (air quality) levels on diversion routes and local roads</p> <p>Impact on noise levels on diversion routes and local roads</p> <p>Impact on different socio-economic groups</p> <p>Impact on safety</p>	<p>State summary outcome</p>
<p><b>Overall Impact against Project Objectives(s)</b></p> <p><b>Project Objective 6: To ensure where possible that any proposals are acceptable in principle to key stakeholders, including affected boroughs</b></p> <p>Summary of STG's and relevant stakeholders' views</p> <p><b>Overall Impact against Project Objectives(s)</b></p>	<p>State summary outcome</p>
<p><b>Project Objective 7: To achieve value for money and, through road user charging, to manage congestion</b></p> <p>Impact on the ability to fund the Scheme and other transport improvements without significantly impacting on other funds</p> <p><b>Overall Impact against Project Objectives(s)</b></p>	<p>State summary outcome</p>
<p><b>Other TIL duties</b></p> <p>Impact on TIL's network management duty under the Traffic Management Act 2004</p>	
<p><b>Overall Impact against other TIL duties</b></p> <p>Compliance with AQ mitigation</p> <p>Consistency with approved air quality mitigations</p>	<p>State summary outcome</p>

Summary assessment  
 Insert a summary of the above assessment, weighing up the outcomes against each project objective and taking into account TIL's other duties to arrive at an overall outcome and recommendation.

Appendix 4

# Silvertown and Blackwall Tunnels User Charges

User Charging Assessment Framework

November 2024

# Contents

<b>1 Overview .....</b>	<b>3</b>
<b>2 User Charging Assessment Framework .....</b>	<b>5</b>
<b>Appendix A – Tunnel User Charges .....</b>	<b>17</b>
<b>Appendix B – Discounts, exemptions and reimbursements .....</b>	<b>18</b>



# 1 Overview

The User Charging Assessment Framework (UCAF) is a summary of how the Silvertown Tunnel ('the Scheme', including the proposed user charges) performs against project objectives and other key requirements. The Charging Policy and Procedures (CPAP)<sup>1</sup>, which is a Certified Document of the DCO for the Silvertown Tunnel, states that the UCAF will be used to inform the setting of the opening user charges and for informing any subsequent variations to the charge.

The scoring and description of performance of the Scheme in the refreshed assessment, including proposed user charges reflects the opening year (2025) and is compared with the reference case, that is, without Silvertown Tunnel. Modelled performance is categorised using a seven-point scale (from -3 'major negative change' through 0 'no impact' to +3 'major positive change') and includes a rationale explaining how the Scheme with the user charges performs. Where a qualitative assessment is used, the framework will state whether or not the objective is met. The seven-point scale and colour-key is shown in **Table 1**.

The user charge levels and a list of discounts and exemptions and reimbursements are set out in the Appendix A and B.

**Table 1: UCAF seven-point scoring scale**

Performance	Score
Major negative change	-3
Negative change	-2
Slight negative change	-1
No impact	0
Slight positive change	1
Positive change	2
Major positive change	3

<sup>1</sup> [Silvertown Tunnel Charging Policies and Procedures \(2017\)](#)

Scheme performance against each metric has been assessed based on a range of information, including outputs and analysis from the refreshed assessment described above - this is summarised for metrics listed under each project objective in **Table 2**.

Further information on the UCAF, and background detail about the refreshed assessment that was undertaken to set the opening tunnel user charge, can be found in the Supplementary Information note that accompanied the user charge consultation between July and September 2024. This document has been updated following this consultation.

**Table 2: UCAF assessment types and metric inputs by project objective**

Project objective	Assessment type	Metric inputs
1 & 2	Quantitative	Strategic transport modelling outputs, including Scheme impacts on traffic flow, composition, speed, delay and journey times
3	Quantitative	Strategic transport modelling outputs; demographic and socio-economic data on the distribution of population and jobs
4	Qualitative	Reference to current local and strategic land use policies
5	Quantitative	Environmental modelling outputs, including Scheme impacts on air quality (Nitrogen dioxide (NO <sub>2</sub> ) concentration) and noise; demographic and socio-economic data on the distribution of population and jobs
6	Qualitative	Reference to ongoing engagement with local authorities, including the host boroughs
7	Quantitative	Strategic transport modelling outputs and financial assessment outputs
Alignment with other TfL duties	Qualitative	Reference to TfL's network management duty under the Traffic Management Act 2004, as well as other duties such as the public sector equality duty
Compliance with AQ mitigation	Quantitative	Environmental modelling outputs, including Scheme impacts on air quality (NO <sub>2</sub> concentration) and noise

## 2 User Charging Assessment Framework

Project Objective 1: To improve the resilience of the river crossings in the highway network in east and southeast London to cope with planned and unplanned events and incidents	
Project Objective 2: To improve road network performance of the Blackwall Tunnel and its approach roads	
Measure	Score and Description of Impact at Opening Year Charge Level
<i>Impact on vehicle delay, journey time, and journey time reliability through the Blackwall Tunnel</i>	<b>+3 Major Positive Change</b>
	<p>The Scheme, which includes the proposed user charges set out in the appendices, is forecast to result in a large reduction in delay and congestion on the tunnel approaches making vehicle journey times through the tunnel quicker and more reliable in both directions at peak times.</p> <p>Model forecasts indicate that northbound vehicle journey time through the Blackwall Tunnel is forecast to reduce by around 15 minutes in the average morning peak hour (AM peak) and nine minutes in the average evening peak hour (PM peak) in the opening year (2025).</p> <p>Southbound vehicle journey time in the evening peak is forecast to reduce by up to 14 minutes (journey time benefits in the morning peak southbound are less significant due to lower levels of traffic in that direction, at that time).</p> <p>However, the savings will often be greater (up to 20 minutes, and sometimes more), particularly when considering the knock-on effects of frequent closures and incidents at the Blackwall Tunnel which the scheme will significantly reduce – something that is not reflected in the transport models.</p>
<i>Impact on traffic flow and composition at the Silvertown and Blackwall tunnels</i>	<b>0 No Impact</b>
	<p>With new road projects, journey time savings such as those summarised above can result in an increase in traffic on affected routes as more drivers seek to benefit from the reduction in delay and congestion. However, the user charge that will be introduced on both the Silvertown and Blackwall tunnels as part of the Scheme will help to manage vehicle demand to use the tunnels, off-setting this effect.</p> <p>The total number of cross-river vehicle trips through both tunnels combined is consequently not forecast to change significantly with the Scheme (a two per cent increase in daily traffic is expected</p>

	<p>in the opening year), resulting in no significant impact. Note that the new cross-river bus service is included in this vehicle trip increase.</p> <p>The user charge will also help to manage Heavy Goods Vehicle (HGV) demand, meaning that no significant impact is forecast on traffic composition - the total number of daily cross-river Heavy Goods Vehicle trips is forecast to reduce by 0.5 per cent (around 30 trips in total) with the Scheme in place.</p>
<p><i>Impact on traffic flow and composition at nearby crossings (incl. Tower Bridge, Rotherhithe Tunnel, Woolwich Ferry, Dartford Crossing)</i></p>	<p><b>0 No Impact</b></p> <p>The impact on traffic flow and composition at nearby crossings is not forecast to be significant and can be summarised as follows:</p> <p><b>Tower Bridge:</b> the total number of daily cross-river vehicle trips is forecast to decrease by 0.1 per cent (-72 trips in total) - this includes a forecast increase in daily HGV trips of six per cent, 115 additional vehicle trips.</p> <p><b>Rotherhithe Tunnel:</b> the total number of daily cross-river vehicle trips is forecast to increase by four per cent (1,046 trips in total). HGVs are not permitted through the tunnel, this will continue with the Scheme in place.</p> <p><b>Woolwich Ferry:</b> the total number of daily cross-river vehicle trips is forecast to decrease by one per cent (-39 trips in total) - daily HGV trips are forecast to increase by two per cent, 15 additional vehicles.</p> <p><b>Dartford Crossing:</b> the total number of daily cross-river vehicle trips is forecast to increase by one per cent (1,615 trips in total) - daily HGV trips are forecast to increase by one per cent, 432 additional vehicle trips.</p> <p>These forecast changes are not significant and do not meet the criteria identified to determine requirements for mitigation for traffic or environmental issues caused by the Scheme. These criteria were agreed with the Silvertown Tunnel Implementation Group (STIG) during the refreshed assessment.</p>

<p><i>Impact on journey times along strategic routes</i></p>	<p><b>0 No Impact</b></p> <p>While significant time savings are forecast through the Blackwall Tunnel as summarised above, the Scheme is not forecast to have a significant impact on drivers making journeys on the same side of the River Thames along strategic routes (i.e. the A2, A200, A207, A206, A13 and A12).</p> <p>In some cases, journey times are forecast to decrease partly due to a reduction in delay and queuing on the Blackwall Tunnel approaches, for example along the A2 northbound between Falconwood and Sun-in-the-Sands (by approximately three minutes in the AM peak) and the A13 eastbound from Limehouse to Beckton Roundabout (by approximately two minutes in the PM peak).</p> <p>In other cases, journey times are forecast to increase (for example, the A2 eastbound from New Cross to Sun-in-the-Sands and the A206/A200 westbound from the A102 to Rotherhithe in the PM peak) albeit these increases do not exceed two minutes in any time period with the Scheme in place. This mix of slight increases and decreases in journey time on various strategic routes results in an overall assessment of 'no impact'.</p> <p>Traffic signal timings along key routes have been reviewed and will be optimised at relevant junctions to minimise delays as part of a planned comprehensive monitoring plan.</p>
<p><i>Impact on traffic on diversion routes and local roads</i></p>	<p><b>0 No Impact</b></p> <p>Traffic flow and composition is not forecast to change significantly on other roads because of the Scheme. The volume of traffic (measured in terms of total daily vehicle-kilometres) in Greenwich, Tower Hamlets and Newham is forecast to decrease in all time periods, except for Tower Hamlets in the evening peak (an increase of three per cent) and Newham in the morning peak (an increase of less than one per cent). These increases mostly occur on strategic routes (for example the A12).</p> <p>Traffic on some local roads such as Chrisp Street, Manor Road and Abbott Road is conversely forecast to decrease. In most time periods there is little change in the average speed of traffic, except for an increase from 21kph to 24kph in the morning peak in Greenwich and an increase from 17kph to 19kph in the evening peak in Tower Hamlets. As with the changes in traffic flow, this is primarily caused by improved conditions on strategic routes in these boroughs linked to a reduction in queuing on the Blackwall Tunnel approaches.</p>

<b>Overall impact against Project Objectives</b>	<b>Objectives Met</b>
	<p>The Scheme is forecast to deliver Project Objectives 1 and 2 by providing an additional cross-river traffic route (adding resilience) and introducing user charges set at a level to reduce vehicle journey time at peak times and improve journey time reliability by reducing delays and congestion.</p> <p>It is not forecast to cause any significant negative impacts on other roads and crossings. The traffic impact of the Scheme will be monitored extensively until at least 2028, including at key junctions in east London, enabling any unforeseen issues to be addressed.</p>

<b>Project Objective 3: To support economic and population growth, in particular in east and southeast London by providing improved cross-river transport links.</b>	
<b>Measure</b>	<b>Description of Impact at Opening Year Charge Level</b>
<i>Impact on user benefits</i>	<p><b>+3 Major Positive Change</b></p>
	<p>The Scheme is forecast to reduce vehicle journey time through the Blackwall Tunnel (including bus route 108) and improve journey time reliability by reducing congestion and queuing on the tunnel approaches through capacity enhancements and demand management through user charges. It will also provide two new cross-river bus routes (129 &amp; Superloop Bus route SL4) through the Silvertown Tunnel.</p> <p>In the opening year, these improvements are forecast to save 9,800 vehicle-hours per day and 2,800 public transport passenger-hours per day (07:00-19:00).</p> <p>In the Business Case for the Scheme, which has been developed in line with Government guidance, the value of these time savings to tunnel users is forecast to outweigh the cost of the user charge, resulting in a net benefit. Some residents from low-income households will also qualify for a discount to reduce the cost of the user charge.</p>

<p><i>Impact on business</i></p>	<p><b>+3 Major Positive Change</b></p> <p>The forecast reduction in vehicle journey time and improvement in journey time reliability through the Blackwall Tunnel will deliver a significant economic benefit for businesses. In the opening year, people travelling on business (including Light Goods Vehicles and Heavy Goods Vehicles drivers) are forecast to save 5,800 vehicle-hours per day due to the Scheme.</p> <p>New cross-river bus routes (129 &amp; SL4) and lower journey times on the Route 108 will also increase the number of people within 60 minutes' public transport travel time of major employment locations such as Canary Wharf, Stratford, Lewisham and Greenwich Town Centre - this will improve access to more potential workers for businesses and employers.</p> <p>Eligible small businesses, sole traders and charities based in the host boroughs<sup>2</sup> can register a maximum of three vehicles to receive a £1 discount on standard off-peak charges for a period of at least 12 months from tunnel opening.</p>
<p><i>Impact on the ability of residents to access employment opportunities</i></p>	<p><b>+2 Positive Change</b></p> <p>Residents will benefit from a forecast reduction in vehicle journey time and improvement in journey time reliability through the Blackwall Tunnel. In the opening year, car commuters are forecast to save 1,500 vehicle-hours per day with public transport commuters saving 900 passenger-hours per day (07:00-19:00).</p> <p>Although the user charge will be a new cost for residents, the overall value of time savings to tunnel users is forecast to outweigh the cost, resulting in a net benefit. Residents in east London boroughs<sup>3</sup> from qualifying low-income households will also receive a discount to reduce the cost of the user charge.</p> <p>The new cross-river bus network including routes 129 &amp; Superloop SL4 and lower journey times on the Route 108 will enable residents on the Greenwich Peninsula to access over 43,000 more jobs within a 60-minute journey.</p>

<sup>2</sup> London Borough (LB) Newham, LB Tower Hamlets, Royal Borough (RB) Greenwich

<sup>3</sup> London Borough (LB) Barking & Dagenham, LB Bexley, LB Bromley, City of London Corporation, Royal Borough (RB) Greenwich, LB Hackney, LB Havering, LB Lewisham, LB Newham, LB Redbridge, LB Southwark, LB Tower Hamlets, LB Waltham Forest.

	Similarly, residents of West Silvertown will be able to access over 21,000 more jobs within a 60-minute journey.
<i>Impact on public transport</i>	<b>+3 Major Positive Change</b>
	Bus route 108 uses the Blackwall Tunnel and the congestion on the tunnel approaches, alongside frequent tunnel closures, means this route has extended journey times and poor journey time reliability. The additional capacity provided by the Scheme, with the user charge to manage demand, will result in quicker and more reliable journeys on the 108 route as journeys will be more free-flowing and there will be fewer incidents of tunnel closures, particularly in the northbound direction. The two new cross-river routes (129 & SL4) through the Silvertown Tunnel will create new sustainable travel opportunities for people on both sides of the river.
<b>Overall impact against Project Objective</b>	<b>Objective Met</b>
	The Scheme is forecast to deliver Project Objective 3 through the provision of new cross-river bus network and reduced journey times as a result of enhanced capacity and user charges as well as improved reliability, for Route 108 passengers and other vehicle users. This is forecast to improve people's access to jobs, services and leisure and better connect businesses with their customers and suppliers, supporting economic and population growth in east and southeast London.



Project Objective 4: To integrate with local and strategic land use policies	
<b>Overall impact against Project Objective</b>	<b>Objective Met</b>
	The design of the Scheme, including the level of the proposed user charges to manage demand and emissions, reduces the severance which makes the area appealing for a variety of local and strategic land uses in east London. For instance, the scheme has been designed to facilitate future development at key sites, e.g. Tidal Basin Roundabout.

Project Objective 5: To minimise any adverse impacts of any proposals on communities, health, safety and the environment	
Measure	Description of Impact at Opening Year Charge Level
Impact on emission levels (air quality) on the Silvertown and Blackwall tunnel approaches	<b>1 Slight Positive Change</b>
	<p>The Scheme is not forecast to cause any exceedances of national air quality objectives (air quality limits and target values for a range of emissions that the UK must comply with for the purposes of National and Local Air Quality Management).</p> <p>Nitrogen dioxide (NO<sub>2</sub>) concentration on the A102 south of the Blackwall Tunnel is forecast to decrease by an average of 2.9 micrograms per cubic metre of air (µg/m<sup>3</sup>) due to the Scheme at the proposed user charge levels.</p> <p>NO<sub>2</sub> concentration on Silvertown Way and Tidal Basin Road (on the northern approach to the Silvertown Tunnel) are forecasted to slightly increase (by 1.3 µg/m<sup>3</sup> and 0.7 µg/m<sup>3</sup> respectively). None of these changes are significant. NO<sub>2</sub> concentrations on the A12 north of the Blackwall Tunnel is expected to decrease by 2.4 µg/m<sup>3</sup>.</p>

<i>Impact on emission levels (air quality) on the approaches to nearby crossings including Tower Bridge, Rotherhithe Tunnel and Woolwich Ferry</i>	<p><b>0 No Impact</b></p> <p>Little change is forecast in air quality on neighbouring crossings due to the Scheme. The Rotherhithe Tunnel southern portal is forecast to experience an insignificant increase in NO<sub>2</sub> concentration (of 0.1 µg/m<sup>3</sup>) which does not exceed the national air quality objective for NO<sub>2</sub>.</p>
<i>Impact on noise levels on the Silvertown and Blackwall tunnel approaches</i>	<p><b>0 No Impact</b></p> <p>Noise levels on the tunnel approaches are forecast not to change due to the Scheme. An insignificant increase of 1.3 decibels (db) is forecast on Tidal Basin Road. The Scheme is forecasted not to have a noise impact on properties or justify property-specific noise insulation measures.</p>
<i>Impact on noise levels on the approaches to nearby crossings incl. Tower Bridge, Rotherhithe Tunnel and Woolwich Ferry</i>	<p><b>0 No Impact</b></p> <p>Noise levels at neighbouring crossings are forecast not to change due to the Scheme. The Scheme is forecast not to have a noise impact on properties or justify property-specific noise insulation measures.</p>
<i>Impact on emissions (air quality) levels on diversion routes and local roads</i>	<p><b>0 No Impact</b></p> <p>Little change is forecast in air quality on diversion routes and local roads due to the Scheme. An insignificant increase is forecast on the A12 south of Bow Roundabout (+0.7 µg/m<sup>3</sup> in NO<sub>2</sub> concentration).</p>

	A small decrease in NO2 concentration is forecast on the A13 East India Dock Road (-2 µg/m3), Cotton Street (-1.3 µg/m3), and Abbott Road (-0.6 µg/m3), one of the routes identified above as benefitting from a forecast reduction in rat-running due to the Scheme.
<i>Impact on noise levels on diversion routes and local roads</i>	<b>0 No Impact</b>
	Noise levels on diversion routes and local roads are not forecast to change due to the Scheme. Insignificant increases in noise (of 2.2db and 1.6db) are forecast respectively on Lower Lea Crossing and Aspen Way. Insignificant decreases in noise (of 2.5db and 1db) are forecast respectively on Abbott Road and the A13 East India Dock Road. The Scheme is not expected to produce any noise impact on properties or justify property-specific noise insulation measures.
Impact on different socio-economic groups	<b>1 Slight Positive Change</b>
	Given proposed discounts and exemptions, the user charge is not expected to significantly impact accessibility by car for vulnerable populations (for example disabled people), who will also benefit from improved journey times and journey time reliability. Cross-river severance is considered to be improved due to improvements in connectivity, including by public transport. New cross-river bus routes (129 & SL4) and improved journey times on the Route 108 will also provide significant benefits for multiple groups of people and provide viable cross-river alternatives to private vehicle use. Of all the households within 400m of a bus stop on this new cross-river bus network, 60 per cent are in low-income areas; nearly 60 per cent do not have access to a car; and over 50 per cent identify as predominantly Black or minority ethnic. Further information can be found in the Equality Impact Assessment.

Impact on safety	<p>The design of the Scheme and mitigations meet all relevant safety standards. People from more deprived areas, some ethnic minorities, disabled people, children and older people are disproportionately affected by road danger in London. However, no impacts on road safety due to changes in traffic levels and speeds on local roads resultant of the Scheme have been identified.</p>
Overall impact against Project Objective	<p><b>Objective Met</b></p>
	<p>The Scheme is forecast to deliver Objective 5. A step-change in cross-river bus services will provide significant benefits to multiple groups of people. The Scheme is also forecast to improve air quality on the Blackwall Tunnel approaches, the A13 East India Dock Road, Cotton Street, West Parkside and Abbott Road.</p> <p>No significant negative impacts are expected on communities, health, safety, or the environment. The Scheme in operation at this charge level is not forecast to give rise to materially new or materially different environmental effects to those reported in the Environmental Statement.</p>

**Project Objective 6: To ensure where possible that any proposals are acceptable in principle to key stakeholders, including affected boroughs**

Overall impact against Project Objective	<p><b>Objective Met</b></p>
	<p>As per Article 66(5)(e) of the DCO, the views of Silvertown Tunnel Implementation Group (STIG) members (which includes officers from eleven London boroughs, City of London and National Highways) were collated as part of the consultation on the opening user charge levels as well as the proposed exemptions and discounts.</p> <p>All responses to issues raised by key stakeholders, including STIG members, are included in Appendix A of the Silvertown and Blackwall Tunnel User Charges Consultation Report. This can be found on the <a href="#">Silvertown and Blackwall tunnels user charge consultation website</a>.</p>

<b>Project Objective 7: To achieve value for money and, through road user charging, to manage congestion</b>	
<b>Overall impact against Project Objective</b>	<b>Objective Met</b>
	<p>The Scheme is forecast to deliver Objective 7: new cross-river road capacity will reduce congestion and queuing on the Blackwall Tunnel approaches and the user charge will manage traffic levels (see measures for Objectives 1 and 2).</p> <p>Revenue generated by the user charge is forecast to cover the costs of building, maintaining and operating the Scheme, meaning that it will deliver value for money. Any additional revenue raised over and above these costs will be reinvested in London's transport network.</p>

Other TfL duties (TfL's network management duty under the Traffic Management Act 2004; compliance with relevant legislation relating to TfL's functions)	
<b>Overall impact against Project Objective</b>	<b>Impact aligned with TfL duties</b>
	At the proposed levels, the user charge will enable us to fulfil our network management duty to maintain the expeditious movement of road users in addition to complying with the Development Consent Order requirements. This specifically relates to balancing the demands and priorities of all road users, including pedestrians and cyclists to minimise congestion and disruption. Traffic monitoring will continue once the tunnel is opened for a least three years to allow changes in traffic patterns to be analysed.
	The work on the refreshed assessment and setting of the initial charges is also aligned with the Public Sector Equality Duty. The Equality Impact Assessment can be found on the <a href="#">Silvertown and Blackwall tunnels user charge consultation website</a> .

Compliance with AQ mitigation	
<b>Overall impact against Project Objective</b>	<b>Impact compliant</b>
	Overall impact of the Scheme with the proposed user charge is forecast not to cause any exceedances of national air quality objectives and meets the objective of not worsening emissions overall. Decreases in NO <sub>2</sub> concentrations are expected in many areas alongside some very small increases in a small number of locations. Air quality will continue to be monitored against national air quality objectives in accordance with DCO requirements. We and the London Boroughs continue to monitor air quality across the city.

## Appendix A – Tunnel User Charges

Silvertown and Blackwall User Charges – 06:00 – 22:00			
	Charges paid via Auto Pay		Charges paid via other channels
	Standard off-peak charges	Peak charges Mon-Fri only <i>Northbound 06:00-10:00</i> <i>Southbound 16:00-19:00</i>	At all times
Motorcycle, moped, motor tricycle	£1.50	£2.50	£2.50
Car and small van	£1.50	£4.00	£4.00
Large van	£2.50	£6.50	£6.50
Heavy Goods Vehicles	£5.00	£10.00	£10.00
Penalty Charge Notice for non-payment - £180 (Reduced to £90 if paid within two weeks; maximum one PCN per day)			

## Appendix B – Discounts, exemptions and reimbursements for the Silvertown and Blackwall tunnels user charges

Discounts	Eligibility Criteria
<b>50 per cent Discount</b>	
East London low-income residents' discount (for a period of at least three years)	To qualify individuals must live within an east London borough <sup>4</sup> and be in receipt of certain benefits <sup>5</sup> .
<b>£1 discount business discount on standard off-peak charges</b>	
Business discount (for a period of at least 12 months)	Eligible small businesses, sole traders and charities based in the host boroughs can register a maximum of three vehicles to receive a £1 discount on off-peak charges.
<b>100 per cent Discount</b>	
Recovery and breakdown vehicles	This discount applies to recovery and breakdown vehicles operated by organisations in the European Economic Area that are accredited to BS EN ISO9001:2008 (and in accordance with the specification for applying that standard to the industry).
Vehicles with 9+ seats	This discount applies to vehicles with nine seats or more (vehicles registered with the DVLA as a minibus, bus or coach will automatically receive a discount and will not need to apply for the discount).
Blue Badge holders	This discount applies to individuals who hold a valid Blue Badge in the European Economic Area. Individuals can register up to two vehicles that would be used to travel though Silvertown or Blackwall Tunnels. This could be their own vehicle, or one they travel in.

<sup>4</sup> London Borough (LB) Barking & Dagenham, LB Bexley, LB Bromley, City of London Corporation, Royal Borough (RB) Greenwich, LB Hackney, LB Havering, LB Lewisham, LB Newham, LB Redbridge, LB Southwark, LB Tower Hamlets, LB Waltham Forest.

<sup>5</sup> Carer's Allowance, Child Tax Credit, Housing Benefit, Income-related Employment & Support Allowance, Income-based Jobseekers Allowance, Income Support, Universal Credit, State Pension Credit, Working Tax Credit



Certain operational vehicles	This discount applies to qualifying organisations that operate vehicles performing certain essential public services including certain services provided by the host boroughs <sup>6</sup> . Eligibility is determined by TfL.
Waste collection and waste disposal vehicles used by east London boroughs <sup>7</sup>	This discount applies to vehicles being used by east London boroughs to provide waste collection and disposal services. Eligibility is determined by TfL.
Zero-Emission Capable and Wheelchair Accessible private hire vehicles (PHVs)	This discount applies to PHVs designated as wheelchair-accessible vehicles or zero emission capable as long as they are fulfilling a private hire booking and are licensed with London Taxi and Private Hire.

<b>Exemptions</b>	
Taxis	This exemption applies to taxis which are licensed with London Taxi and Private Hire.
Emergency services vehicles exempt from vehicle tax	This exemption applies to emergency service vehicles which are exempt from vehicle tax on the date of travel.
NHS vehicles exempt from vehicle tax	This exemption applies to NHS vehicles that are exempt from vehicle tax.
Vehicles in the disabled tax class	This exemption applies to vehicles used by disabled people that are exempt from vehicle tax.
Military vehicles in use	This exemption applies to vehicles currently used by the armed forces including visiting services or international organisations.

<sup>6</sup> LB Newham, LB Tower Hamlets and RB Greenwich

<sup>7</sup> East London boroughs are those listed in footnote 1 above.

Reimbursements <sup>8</sup>	
NHS Patient Reimbursement <sup>9</sup>	<p>NHS patients are eligible for reimbursement if:</p> <ol style="list-style-type: none"> <li>1. Clinically assessed as too ill, weak or disabled to travel to an appointment on public transport, and any of following apply: <ul style="list-style-type: none"> <li>• Have a compromised immune system (problems with your immune system)</li> <li>• Require regular therapy or assessment</li> <li>• Require recurrent surgical intervention</li> </ul> </li> </ol> <p>OR</p> <ol style="list-style-type: none"> <li>2. During an epidemic or pandemic prevalent in Greater London, are clinically assessed as being too vulnerable to infection to travel to an appointment on public transport.</li> </ol>
NHS Staff Reimbursement	<p>NHS staff members, are eligible for reimbursement if any of the following criteria is met:</p> <ol style="list-style-type: none"> <li>1. Those using their vehicles to carry any of the following: <ul style="list-style-type: none"> <li>• Bulky, heavy or fragile equipment/supplies</li> <li>• Patients' notes or other confidential material</li> <li>• Controlled drugs</li> <li>• Clinical waste, contaminated sharps, radioactive materials or non-medicinal poisons</li> <li>• Prescription-only medicines or waste medicinal products</li> <li>• Clinical specimens, body fluids, tissues or organs</li> </ul> </li> </ol> <p>OR</p> <ol style="list-style-type: none"> <li>2. Those responding to an emergency Or other extraordinary circumstances when on call.</li> </ol>

<sup>8</sup> Before making a claim for reimbursement, the user charge must be paid on or before the day of your journey, or the vehicle used for the journey must be registered for a TfL Auto Pay account.

<sup>9</sup> The NHS trust or hospital must be registered with TfL for the reimbursement scheme. Any refund request should be made through the NHS trust or hospital as they manage the reimbursement process, not TfL.

# Appendix 5

## Silvertown and Blackwall Tunnels User Charges

Equality Impact Assessment

November 2024

# Contents

1	Acronyms and Abbreviations .....	5
2	Executive Summary.....	6
3	Introduction.....	20
4	Overview of Project.....	21
4.1	Background .....	21
4.2	Setting the Initial User Charges .....	22
4.2.1	The Assessed Case .....	22
4.2.2	Assessing the equality impacts of the user charges in the Assessed Case ...	23
4.2.3	Reviewing the Assessed Case.....	23
4.3	Purpose of EqIA .....	28
4.3.1	Role of EqIA in Setting the User Charges .....	29
5	Consultation.....	30
6	Impact Assessment Methodology .....	31
6.1	Scoping .....	31
6.1.1	People Scope.....	31
6.1.2	Spatial Scope .....	32
6.2	Evidence Base .....	34
6.3	Assessment Framework.....	34
6.4	Quantification of Effects.....	36
7	Baseline.....	38
7.1	Local Study Area Profile .....	38
7.1.1	The northern LSA.....	38
7.1.2	The southern LSA .....	39
7.1.3	Community Facilities .....	39
	Community Facilities in the LSA are comprised of:.....	39
7.2	Population Data.....	41
7.2.1	Population Statistics.....	41
7.2.2	Car Ownership by borough .....	41
7.2.3	Van Ownership by borough.....	42
7.2.4	Motorcycle ownership by borough.....	42
7.2.5	Cross-River Travel in East/Southeast London .....	43
7.3	Age.....	45
7.3.1	Age Profile.....	45
7.3.2	Travel Mode by Age .....	46
7.3.3	Cross-River Travel in East/Southeast London .....	47
7.4	Sex .....	48

7.4.1	Sex Profile.....	48
7.4.2	Travel Mode by Sex .....	49
7.4.3	Cross-River Travel in East/Southeast London .....	50
7.5	Fertility Rates .....	51
7.6	Religion or Belief .....	51
7.6.1	Religion or Belief Profile .....	51
7.7	Race .....	52
7.7.1	Race Profile.....	52
7.7.2	Travel Mode by Race .....	53
7.7.3	Car Ownership by Race .....	55
7.7.4	Cross-River Travel in East/Southeast London .....	55
7.8	Sexual Orientation and Gender Reassignment (LGBT).....	56
7.9	Disability .....	58
7.9.1	Disability Profile.....	58
7.9.2	Travel Mode by Disability .....	58
7.9.3	Cross-River Travel in East/Southeast London .....	60
7.9.4	Dial-a-Ride Users .....	60
7.9.5	Blue Badge Holders .....	61
7.10	Homelessness.....	62
7.11	Asylum Seekers & Refugees.....	63
7.12	Carers.....	64
7.13	Employment, Income and Deprivation.....	66
7.13.1	Employment Levels.....	66
7.13.2	Employment by Occupation .....	67
7.13.3	Universal Credit Support Recipients .....	69
7.13.4	Social Grades.....	69
7.13.5	Deprivation.....	70
7.13.6	Travel Mode by Income.....	72
7.13.7	Cross-River Travel in East/Southeast London .....	73
7.13.8	Car Ownership by Low-Income Residents .....	74
8	Equality Impact Assessment.....	75
8.1	Accessibility (Including Access to Community Facilities).....	75
8.1.1	Introduction .....	75
8.1.2	Summary.....	76
8.1.3	Age.....	78
8.1.4	Disability.....	81
8.1.5	Religion or Belief.....	84

8.1.6	Race.....	85
8.1.7	Homeless People and Asylum Seekers/Refugees .....	86
8.1.8	People on Low Incomes .....	87
8.1.9	Pregnancy and Maternity .....	88
8.1.10	Sex.....	88
8.1.11	Sexual Orientation and Gender Reassignment (LGBT) .....	89
8.2	Access to Work and Training.....	89
8.2.1	Introduction .....	89
8.2.2	Age.....	93
8.2.3	Disability.....	94
8.2.4	Homeless People and Asylum Seekers/Refugees .....	97
8.2.5	People on Low Incomes .....	97
8.2.6	Carers .....	99
8.3	Active Travel.....	102
8.3.1	Introduction .....	102
8.3.2	Summary.....	103
8.3.3	Assessment.....	103
8.4	Air Quality.....	104
8.4.1	Introduction .....	104
8.4.2	Summary.....	104
8.4.3	Assessment.....	105
8.5	Noise .....	106
8.5.1	Introduction .....	106
8.5.2	Summary.....	106
8.5.3	Assessment.....	107
8.6	Road Safety.....	107
8.6.1	Introduction .....	107
8.6.2	Summary.....	108
8.6.3	Assessment.....	108
8.7	Social Capital .....	109
8.7.1	Introduction .....	109
8.7.2	Summary.....	109
8.7.3	Assessment.....	110
9	Monitoring and Evaluation .....	112
10	Conclusion.....	113

# 1 Acronyms and Abbreviations

- CO<sub>2</sub>: Carbon Dioxide
- CPAP: Charging Policies and Procedures
- CQC: Care Quality Commission
- Db: Decibels
- DCO: Development Consent Order
- DLA: Disability Living Allowance
- DLR: Docklands Light Railway
- DWP: Department for Work and Pensions
- EHCP: Education Health and Care Plans
- EqIA: Equality Impact Assessment
- HEqIA: Health and Equality Impact Assessment
- IMD: Indices of Multiple Deprivation
- LB: London Borough
- LGBT: Lesbian, Gay, Bisexual, Transgender
- LSA: Local Study Area
- LSOA: Lower layer Super Output Area
- LTDS: London Travel Demand Survey
- NHS: National Health Service
- NO<sub>2</sub>: Nitrogen Dioxide
- NO<sub>x</sub>: Nitrogen Oxide
- ONS: Office for National Statistics
- PA: Personal Assistant
- PHV: Private Hire Vehicle
- PIP: Personal Independence Payment
- PM<sub>10</sub>/PM<sub>2.5</sub>: Particulate Matter
- PO: Project Objective
- PSED: Public Sector Equality Duty
- RB: Royal Borough
- SEND: Special Educational Needs and Disability
- STIG: Silvertown Tunnel Implementation Group
- TfL: Transport for London
- UCAF: User Charging Assessment Framework
- ZEC: Zero Emission Capable

## 2 Executive Summary

The Silvertown Tunnel scheme involves the construction of a twin-bore road tunnel under the Thames. This will provide a new road link between the A102 Blackwall Tunnel Approach on Greenwich Peninsula (London Borough of Greenwich) and the Tidal Basin Roundabout junction on the A1020 Lower Lea Crossing/Silvertown Way (London Borough of Newham).

A critical part of the Silvertown Tunnel scheme is the implementation of user charges on the Silvertown and Blackwall tunnels when Silvertown Tunnel opens in 2025 to manage traffic demand at the crossings and ensure the Scheme meets its objectives.

In order to understand the potential impacts arising from the proposed user charges on people from different groups, and to help fulfil our statutory duty under the Public Sector Equality Duty (PSED) and the Equality Act 2010, we have carried out an Equality Impact Assessment (EqIA) to identify any potential disproportionate or differential equality impacts on protected characteristic and disadvantaged groups, to enhance opportunities and to foster good relationships between those with a protected characteristic and those without.

Table 1 summarises the potential disproportionate and/or differential impacts identified as part of the assessment in Section 8.

**Table 1: Summary of equality impact by group**

Group	Relevant Topics	Summary
Age (Young People)	Accessibility (including access to community facilities <sup>1</sup> ), access to work and training, air quality, noise, active travel, road safety, social capital	<p>No disproportionate or differential impacts identified.</p> <p>Young people in London are more likely to travel by bus and will benefit from proposed improvements to bus services cross-river. In addition to travel concessions provided under the green and fair package of concessions and discounts, young people may also be eligible for existing travel concessions for young people in London provided by us.</p> <p>Some young people may be reliant on travel as a car passenger for cross-river journeys, and due to the high levels of deprivation in the area, the user charge may present a financial barrier to travel, leading to changes in travel mode. This is considered to be offset by improvements to journey times and reliability, improvements to public transport provision, and the east London low-income residents' discount (subject to eligibility).</p>

<sup>1</sup> 'Community facilities' includes Education and Healthcare Facilities, Community Centres and Places of Worship



		<p>Young people may also be reliant on travel by community transport (Vehicles with 9+ seats), and the 100 per cent discount for these vehicles help ensure that services are not impacted.</p> <p>Young people are more vulnerable to the negative health impacts of poor air quality. The Scheme is forecast not to cause any exceedances of national air quality objectives. Due to the insignificant changes in NO<sub>2</sub> emissions forecast, there is not expected to be an overall disproportionate or differential impact.</p> <p>Young people may be more sensitive to negative health impacts of increased noise levels from vehicular traffic. However, there is no disproportionate or differential impact identified on people due to noise resultant of the Scheme.</p> <p>Children are disproportionately impacted by road danger in London, and walking and cycling are popular modes of travel for young people. However, no impacts on active travel and road safety due to changes in traffic levels on local roads resultant of the scheme have been identified.</p>
Age (Older People)	Accessibility (including access to community facilities), access to work and training, air quality, noise, active travel, road safety, social capital	<p>No disproportionate or differential impacts identified.</p> <p>Older people are less likely to travel by car as a driver than other age groups, however due to safety and security concerns some may prefer to travel by car cross-river. A large proportion of older people are on low incomes, and this may be exacerbated in the local area due to the high levels of deprivation. The user charge may present a financial barrier to travel, leading to changes in travel mode.</p> <p>Older people eligible for a Blue Badge can receive a 100 per cent discount on the user charges, and those with a vehicle in the disabled tax class will be exempt. Older people on low incomes may also be eligible</p>

		<p>for the east London low-income residents' discount.</p> <p>Older people travelling to eligible NHS appointments by private vehicle (as a driver or passenger) may be eligible for a reimbursement of the user charge if use of the tunnels is required to access their appointment(s).</p> <p>It is recognised that older people are at greater risk of digital exclusion than other age groups, meaning they may face barriers to signing up to Auto Pay, paying the user charge online and applying for concessions they may be eligible for. Customers are able to contact our call centre to carry out functions such as setting up a discount and setting up Auto Pay and are able to send in supporting evidence via post. Customers can also pay the tunnel charges via the automated telephony system without having to go online or download the app.</p> <p>Older people are more likely than other age groups to be in receipt of care provided by carers. If impacts on the provision of care cross-river were to arise, it could have a disproportionate negative impact on older people. Whilst we believe that the proposed concessions in addition to the improvements to journey times and reliability will help to offset any negative impacts, it is proposed that we effectively market the concessions which may be available to carers to them prior to Scheme opening, and review whether further support is required in line with Policy 15 of the Charging Policies and Procedures (CPAP) following tunnel opening.</p> <p>The 100 per cent discount for community transport (Vehicles with 9+ seats) helps to ensure that services provided by community and charitable organisations are not negatively impacted by the user charges.</p> <p>Older people may be eligible for travel concessions provided by us for travel pan-London. However, those not eligible for these who travel by public transport will benefit from the improvements to bus service provision</p>
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		<p>and speeds cross-river, and the travel concessions provided under the green and fair package of concessions and discounts for at least one year after Scheme opening. All of our buses are fully accessible, and those travelling in a wheelchair or mobility scooter travel for free.</p> <p>Some older people may be reliant on travel by taxi or private hire vehicles (PHVs) for cross-river journeys. The exemption for taxis helps ensure services are not negatively impacted. Due to the user charges for non-zero emission capable (ZEC) and non-wheelchair accessible (WAV) PHVs, there may be a potential increase in fares for these journeys. This impact is considered to be limited and offset by improvements to journey times and availability of alternatives, including the bus (with new and improved services cross-river) and taxis. Furthermore, the improvements in journey times and congestion may improve the availability of PHVs for cross-river trips.</p> <p>Older people are disproportionately affected by road danger in London. However, no impacts on road safety due to changes in traffic levels and speeds on local roads resulting from the scheme have been identified.</p> <p>Older people are more vulnerable to the negative health impacts of poor air quality. The Scheme is forecast not to cause any exceedances of national air quality objectives. Due to the insignificant changes in NO<sub>2</sub> emissions forecast, there is not expected to be an overall disproportionate or differential impact.</p>
Disability	Accessibility (including access to community facilities), air quality, noise, active travel, road safety, social capital	<p>No disproportionate or differential impacts identified.</p> <p>Disabled people are more likely to travel by bus than any other mode in London. However, it is recognised that some may face barriers to travel by public transport and may travel by car (as a driver or passenger) due to comfort, safety and security concerns.</p>

		<p>There is a recognised potential for disabled people to be on low incomes, and the user charge may present a financial barrier to travel for some. For those unable to switch modes due to the aforementioned barriers, this may lead to changes to cross-river travel, which may lead to negative impacts on accessibility, access to work and training and social capital for disabled people.</p> <p>To mitigate negative impacts on disabled people who may be reliant on cars for travel, we have proposed a 100 per cent discount for Blue Badge holders, and an exemption for vehicles in the disabled tax class. We have also proposed a 50 per cent discount on the user charges for people on low incomes through the east London low-income residents' discount.</p> <p>Disabled people travelling to eligible NHS appointments by private vehicle (as a driver or passenger) may be eligible for a reimbursement of the user charge if use of the tunnels is required to access their appointment(s).</p> <p>Overall, we believe that the potential negative impact is mitigated through our proposed discounts, exemptions and concessions, alongside the improvements to journey times and reliability.</p> <p>Some disabled people may face barriers to accessing online services such as signing up to Auto Pay, paying the user charge online and applying for concessions they may be eligible for. Customers are able to contact our call centre to carry out functions such as setting up a discount and setting up Auto Pay and are able to send in supporting evidence via post. Customers can also pay the tunnel charges via the automated telephony system without having to go online or download the app.</p> <p>Some disabled people may be in receipt of care provided by carers and are more likely to be receiving care than non-disabled people. If impacts on the provision of care cross-river were to arise, it could have a disproportionate</p>
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		<p>negative impact on disabled people. Whilst we believe that the proposed concessions in addition to the improvements to journey times and reliability will help to offset any negative impacts, it is proposed that we effectively market the concessions which may be available to carers to them prior to Scheme opening, and review whether further support is required in line with Policy 15 of the Charging Policies and Procedures (CPAP) following tunnel opening.</p> <p>The 100 per cent discount for community transport (Vehicles with 9+ seats) helps to ensure that services provided by community and charitable organisations are not negatively impacted by the user charges.</p> <p>Disabled people may be eligible for travel concessions provided by us for travel pan-London. However, those not eligible for these who travel by public transport will benefit from the improvements to bus service provision and speeds cross-river, and the travel concessions provided under the green and fair package of concessions and discounts for at least one year after Scheme opening. All of our buses are fully accessible, and those travelling in a wheelchair or mobility scooter travel for free. For those who would like to switch modes to using public transport, we offer a free travel mentor scheme to support people who would like to try making their journey by different modes on our network.</p> <p>Some disabled people may be reliant on travel by taxi or private hire vehicles (PHVs) for cross-river journeys. The exemption for taxis helps ensure services are not negatively impacted. Due to the user charges for non-ZEC and non-wheelchair accessible PHVs, there may be a potential increase in fares for these journeys. This impact is considered to be limited and offset by improvements to journey times and availability of alternatives, including the bus (with new and improved services cross-river) and taxis. Furthermore, the improvements in journey times and congestion may improve the availability of PHVs for cross-river trips.</p>
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		<p>Disabled people may be more sensitive to negative health impacts of increased noise levels from vehicular traffic. However, there is no disproportionate or differential impact identified on people due to noise resultant of the Scheme.</p> <p>Disabled people are more vulnerable to the negative health impacts of poor air quality. The Scheme is forecast not to cause any exceedances of national air quality objectives. Due to the insignificant changes in NO<sub>2</sub> emissions forecast, there is not expected to be an overall disproportionate or differential impact.</p> <p>Disabled people are disproportionately affected by road danger in London. However, no impacts on road safety due to changes in traffic levels and speeds on local roads resulting from the scheme have been identified.</p>
Pregnancy and Maternity	Accessibility (including access to community facilities), road safety, air quality, social capital	<p>No disproportionate or differential impacts identified.</p> <p>Pregnant and maternal people may prefer travel by car for comfort and safety purposes. Some may be eligible for the east London low-income residents' discount, and all will benefit from improved accessibility due to improved journey times and reliability, which may also lead to improved access to a greater range of facilities and lower risk of missing appointments. Some may also be eligible for the NHS Patient reimbursement scheme when travelling for medical appointments.</p> <p>Some pregnant and maternal people may prefer to use PHVs. Due to the user charges for non-ZEC and non-wheelchair accessible PHVs, there may be a potential increase in fares for these journeys. This impact may be offset by improvements to journey times and availability of PHVs for cross-river trips.</p> <p>Pregnant people and their unborn child are more vulnerable to the negative impacts of poor air quality. The Scheme is forecast not to cause any exceedances of national air</p>

		<p>quality objectives. Due to the insignificant changes in NO<sub>2</sub> emissions forecast, there is not expected to be an overall disproportionate or differential impact.</p>
Race	<p>Accessibility (including access to community facilities), air quality, noise, active travel, road safety, social capital</p>	<p>There may be a potential negative impact on access to work and training for private hire drivers on low incomes who do not own a zero-emission capable (ZEC) or wheelchair accessible PHV. Due to the demographics of private hire drivers, this could have a potential disproportionate impact on people of Asian ethnicity. No additional mitigations are proposed to offset this impact as it is anticipated to reduce over time as vehicles are upgraded to meet licencing requirements and the industry is actively preparing for this transition. Private hire drivers on low incomes may also be eligible for the east London low-income residents' discount, or the business discount helping to offset the cost of the user charge.</p> <p>The Scheme is in an area of high racial diversity and high levels of deprivation, particularly north of the river, and there is an evidenced correlation between deprivation and areas with higher levels of racial diversity.</p> <p>The user charge may present a financial barrier to travel for some. This may lead to reductions and changes in cross-river travel, which may lead to negative impacts on accessibility, access to work and training and social capital. This is considered to be offset by improvements to journey times and reliability, improvements to public transport provision, and the east London low-income residents' discount (subject to eligibility).</p> <p>People from Black, Asian and Other Ethnic Group have a greater intention to use the Silvertown Tunnel at least once a week or more than White respondents, are more likely to use the bus, and more likely to use the Tunnel 2-3 times a week or more. London Travel Demand Survey (LTDS) data shows that Black Londoners are more likely to use</p>

		<p>the bus and less likely to travel by car or rail than other Londoners.</p> <p>Those that continue to or switch to travel by bus will benefit from proposed improvements to bus services cross-river. In addition to travel concessions provided under the green and fair package of concessions and discounts.</p> <p>LTDS data shows that Black Londoners are slightly more likely to use PHVs for travel than other ethnic groups. Due to the user charges for non-ZEC and non-wheelchair accessible PHVs, there may be a potential increase in fares for these journeys. This impact is considered to be limited and offset by improvements to journey times and availability of alternatives, including the bus (with new and improved services cross-river) and taxis. Furthermore, the improvements in journey times and congestion may improve the availability of PHVs for cross-river trips.</p> <p>Black, Asian and minority ethnic people are more likely to live in areas with poorer air quality in London. The Scheme is forecast not to cause any exceedances of national air quality objectives. Due to the insignificant changes in NO<sub>2</sub> emissions forecast, there is not expected to be an overall disproportionate or differential impact.</p> <p>Black, Asian and minority ethnic people may live in areas where noise pollution resultant of vehicular traffic is greater. However, there is no disproportionate or differential impact identified on people due to noise resultant of the Scheme.</p> <p>Some ethnic minority groups are disproportionately affected by road danger in London. However, no impacts on road safety due to changes in traffic levels and speeds on local roads resulting from the scheme have been identified.</p>
Religion or Belief	Accessibility (including access to community)	The Local Study Area is religiously diverse. Some people may be reliant on the use of



	<p>facilities), social capital</p>	<p>private vehicle for access to religious centres and services, and community events.</p> <p>The east London low-income residents' discount in addition to improved journey times and reliability, and improved bus speeds and service provision through the tunnels help to offset potential negative impacts on accessibility for people who make regular cross-river trips for religious purposes.</p> <p>Some people of different religions may benefit from the 100 per cent discount for community transport (Vehicles with 9+ seats) where this is required to attend community events or religious services.</p> <p>There may be a potential negative impact on access to work and training for private hire drivers on low incomes who do not own a zero-emission capable (ZEC) or wheelchair accessible PHV. Due to the demographics of private hire drivers, this could have a potential disproportionate impact on people of Muslim religion. No additional mitigations are proposed to offset this impact as it is anticipated to reduce over time as vehicles are upgraded to meet licencing requirements and the industry is actively preparing for this transition. Private hire drivers on low incomes may also be eligible for the east London low-income residents' discount, or the business discount helping to offset the cost of the user charge.</p>
<p>Sex</p>	<p>Accessibility (including access to community facilities), access to work and training, social capital</p>	<p>No disproportionate or differential impacts identified.</p> <p>The charge may present a financial barrier to for some people of either sex who frequently travel by private vehicle and are on lower incomes, including some women who may have concerns around using public transport due to fear of harassment. The potential negative impact on women who have concerns around public transport travel is considered to be minor and mitigated by the east London low-income residents' discount (subject to eligibility). Wider TfL transport policy improvements relating to safety and harassment on public transport may also help</p>

		<p>some women feel more comfortable travelling by public transport cross-river if they choose to switch modes.</p> <p>Additionally, improved journey times and improvements to cross-river public transport speeds and provision will help to mitigate potential negative impacts.</p>
Sexual Orientation and Gender Reassignment (LGBT)	Accessibility (including access to community facilities), social capital	<p>No disproportionate or differential impacts identified.</p> <p>Due to fear of harassment on public transport, some LGBT people may prefer to use a private vehicle or PHV to travel. Due to the user charges for non-ZEC and non-wheelchair accessible PHVs, there may be a potential increase in fares for these journeys. This impact is not considered to be disproportionate and is offset by improvements to journey times and availability of alternatives, including the bus (with new and improved services cross-river) and taxis. Furthermore, the improvements in journey times and congestion may improve the availability of PHVs for cross-river trips. Wider TfL transport policy improvements relating to safety and harassment on public transport may also help some LGBT people feel more comfortable travelling by public transport cross-river if they choose to switch modes.</p> <p>The potential negative impact of the user charges on LGBT people who have concerns around public transport travel is considered to be minor and mitigated by the east London low-income residents' discount (subject to eligibility) and the improved journey times.</p>
People on Low Incomes	Accessibility (including access to community facilities), access to work and training, air quality, noise, active travel, road safety, social capital	<p>The user charges may present a financial barrier for some people on low incomes, leading to changes in travel modes and frequency. This could impact accessibility, access to work and training, and social capital.</p> <p>This impact is mitigated through the proposed east London low-income residents' discount and improvements to bus services through the tunnels due to new and improved routes.</p>

		<p>In addition there are public transport travel concessions provided by TfL for Londoners on low incomes (subject to eligibility). Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London.</p> <p>There may be a potential negative impact on access to work and training identified for private hire drivers on low incomes who do not own a zero-emission capable (ZEC) or wheelchair accessible PHV. Due to the demographics of private hire drivers, this could have a potential secondary disproportionate impact on people of Asian ethnicity and the Muslim religion. No additional mitigations are proposed to offset this impact as it is anticipated to reduce over time as vehicles are upgraded to meet licencing requirements and the industry is actively preparing for this transition. Private hire drivers on low incomes may also be eligible for the east London low-income residents' discount, or the business discount helping to offset the cost of the user charge.</p> <p>People on low incomes are more likely to live in areas with poorer air quality in London. The Scheme is forecast not to cause any exceedances of national air quality objectives. Due to the insignificant changes in NO<sub>2</sub> emissions forecast, there is not expected to be an overall disproportionate or differential impact.</p> <p>People on low incomes may live in areas where noise pollution resultant of vehicular traffic is greater. However, there is no disproportionate or differential impact identified on people due to noise resultant of the Scheme.</p> <p>People from more deprived areas are disproportionately affected by road danger in London. However, no impacts on road safety due to changes in traffic levels and speeds on</p>
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		local roads resulting from the scheme have been identified.
Homeless People	Accessibility (including access to community facilities), air quality, noise, road safety, social capital	<p>No disproportionate or differential impacts identified.</p> <p>For some homeless people, the user charges may present a financial barrier, and some may face barriers to applying for Auto Pay. This could impact accessibility (including access to community facilities). However, the east London low-income residents' discount (subject to eligibility) in addition to improved journey times and reliability, and improved bus speeds and service provision through the tunnels help to offset potential negative impacts on accessibility for people who make regular cross-river trips.</p> <p>Homeless people may be more reliant on community transport provided by community or charitable organisations. The provision of a 100 per cent discount for community transport (Vehicles with 9+ seats) will benefit charities and organisations that support these groups and helps to ensure that these services are not reduced or cut due to the proposed user charges. These services will also benefit from reduced journey times and improved reliability due to the Scheme.</p>
Asylum Seekers and Refugees	Accessibility (including access to community facilities), air quality, noise, road safety, social capital	<p>No disproportionate or differential impacts identified.</p> <p>For some asylum seekers and refugees, the user charges may present a financial barrier, and some may face barriers to applying for Auto Pay. This could impact accessibility (including access to community facilities). However, the east London low-income residents' discount (subject to eligibility) and free (refunded) pay as you go cross river bus and certain DLR journeys (for at least the first 12 months) in addition to improved journey times and reliability, and improved bus speeds and service provision through the tunnels help to offset potential negative impacts on accessibility for people who make regular cross-river trips.</p>

		<p>Some asylum seekers and refugees may be more reliant on community transport provided by community or charitable organisations. The provision of a 100 per cent discount for community transport (Vehicles with 9+ seats) will benefit charities and organisations that support these groups and the individuals who they support and helps to ensure that these services are not reduced or cut due to the proposed user charges. These services will also benefit from reduced journey times and improved reliability due to the Scheme.</p>
<p>Carers (paid, voluntary, informal and personal assistants)</p>	<p>Access to work and training</p>	<p>There is potential for the user charges to impact on access to work and training for carers (voluntary, paid, informal and personal assistants) and care providers providing services cross-river. If this impact were to affect the provision of care, it could lead to negative impacts on social capital and accessibility for disabled people and older people, and access to work and training for disabled people. Changes to the provision of care by the voluntary and charitable sectors could negatively impact disabled people, older people, homeless people, and asylum seekers and refugees.</p> <p>Whilst we believe that our proposed discounts and exemptions together with the improvements to journey times and reliability will help to ensure these impacts do not arise, it is important that we monitor how the scheme is affecting cross-river care provision and seek to address these impacts should they arise (while continuing to meet the Project Objectives of the scheme). In line with Policy 15 of the CPAP, we will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening.</p> <p>Additionally, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended we provide targeted communications to raise awareness of the discounts, exemptions and free (refunded) pay as you go bus and certain DLR river crossings (for at least 12 months) that care providers or their clients may be entitled to as</p>

		well as the benefits of signing up for Auto Pay as part of our marketing plan.
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### 3 Introduction

In May 2018, a Development Consent Order (DCO) was granted by the Secretary of State for Transport for the construction of the Silvertown Tunnel under the Thames.

As part of the Scheme, user charges will be introduced at both Silvertown Tunnel and Blackwall Tunnel when the Silvertown Tunnel opens in 2025.

We must set the initial charges before the Silvertown Tunnel opens to traffic and have been following the processes and policies for setting these charges in line with the Charging Policies and Procedures (CPAP).<sup>2</sup>

We have undertaken an Equality Impact Assessment (EqIA) (this document) to identify any potential disproportionate or differential equality impacts on protected characteristic and disadvantaged groups arising from the proposed user charges. The document details the impacts identified and sets out the measures which may be required to reduce or mitigate these impacts where appropriate.

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<sup>2</sup> [Silvertown Tunnel Charging Policies and Procedures \(2017\)](#)

# 4 Overview of Project

## 4.1 Background

The Silvertown Tunnel scheme (the Scheme) involves the construction of a twin-bore road tunnel under the Thames. This will provide a new road link between the A102 Blackwall Tunnel Approach on Greenwich Peninsula (London Borough of Greenwich) and the Tidal Basin Roundabout junction on the A1020 Lower Lea Crossing/Silvertown Way (London Borough of Newham).

The purpose of constructing the tunnel is to improve the reliability and resilience of the wider road network. At present, the Blackwall Tunnel – the main river crossing in the area, is frequently impacted by delays, congestion and closures. This leads to long tailbacks and increased journey times as drivers choose longer routes to avoid the tunnel.

The DCO for the Scheme was granted by the Department for Transport in May 2018. Construction commenced on the project in 2020, and the tunnel is planned to open in 2025.

The Scheme aims to reduce this chronic congestion experienced in east London today, improve journey times and keep traffic moving efficiently. When the Silvertown Tunnel opens it will help to:

- Reduce delays and queues at the Blackwall Tunnel, with journey times up to 20 minutes faster;
- Reduce the environmental impact of traffic congestion on some of London's most polluted roads;
- Provide more opportunities to cross the river by public transport with a network of zero-emission buses (at the tailpipe) offering new routes and better access to more destinations.

A critical part of the Scheme is the implementation of user charges on the Silvertown and Blackwall tunnels when Silvertown Tunnel opens.

The DCO confers a general power on us to impose user charges at the Silvertown and Blackwall tunnels. This power provides scope to set all aspects of the proposed user charges including the charge levels, and stipulating the hours during which the charge shall apply, the vehicles charged, the discounts and exemptions granted and other related criteria.

The primary function of the user charges is to enable the management of traffic demand for the river crossing. By managing this traffic demand, the other effects of the Scheme can be effectively managed and the Project Objectives (PO) met. The Project Objectives are as follows:

- PO1: to improve the resilience of the river crossings in the highway network in east and southeast London to cope with planned and unplanned events and incidents;
- PO2: to improve the road network performance of the Blackwall Tunnel and its approach roads;

- PO3: to support economic and population growth, in particular in east and southeast London by providing improved cross-river transport links;
- PO4: to integrate with local and strategic land use policies;
- PO5: to minimise any adverse impacts of any proposals on communities, health, safety and the environment;
- PO6: to ensure where possible that any proposals are acceptable in principle to key stakeholders, including affected boroughs;
- PO7: to achieve value for money and, through road user charging, to manage congestion.

The user charges also provide a means of helping to pay for the design and construction and operation of the Scheme.

The user charges need to be applied at both the Silvertown and Blackwall tunnels to achieve the Project Objectives and realise the Scheme benefits. Further information on the requirement for user charges at Silvertown and Blackwall tunnels is contained within the [Supplementary Information document](#) published during our public consultation on the proposed user charges.

## 4.2 Setting the Initial User Charges

### 4.2.1 The Assessed Case

The DCO gives us the power to set the user charges prior to Silvertown Tunnel opening and to make subsequent variations to the user charges.

The DCO application was based on our Assessed Case, which set out a scenario of proposed charges, discounts and exemptions which would enable us to meet the Project Objectives.

The Assessed Case had been developed along with a number of alternative scenarios and sensitivity tests in readiness for the submission of the DCO application in spring 2016. It was based on our understanding and forecasting of the likely conditions at Scheme opening. The Assessed Case enabled us, the examiners, stakeholders and the public to understand the likely impacts of the Scheme based on current assumptions about traffic and its impacts.

Part of the Assessed Case was the set of user charges and associated parameters, based on 2015 prices.

It was recognised at the time that there would be a need to refresh the assumptions in the Assessed Case prior to scheme opening, by re-running the relevant transport and environmental models and carrying out up to date analysis.

This update – known as the Refreshed Assessment – is now complete, and the process we followed is described below. This update has led us to revise the proposed user charges and these are now the subject of this consultation.

Further information can be found in the [Supplementary Information document](#).



## 4.2.2 Assessing the equality impacts of the user charges in the Assessed Case

A Health and Equality Impact Assessment<sup>3</sup> (HEqIA) formed part of the suite of documents prepared to accompany the DCO Application for the Scheme. This assessed the impact of the Scheme during its construction and operation – based on the indicative user charges in the Assessed Case.

In relation to the equality impacts of the operation of the Scheme, the following potential disproportionate/differential equality impacts were identified for the indicative user charges:

- *Low-income households may be disproportionately affected as a result of the user charge. This may be offset by improvements to public transport.*

At the time of the HEqIA, no discounts or exemptions were proposed for people on low incomes. However, in 2016 when Sadiq Khan was elected Mayor of London, he undertook a review of the scheme (which at the time was part of a river crossings in east London programme). As well as affirming his support for the Scheme, at the time the Mayor announced various amendments related to the user charges, including a minimum of 50 per cent discount for host borough residents on a low income for the duration of the three-year monitoring period.

## 4.2.3 Reviewing the Assessed Case

Prior to the Silvertown Tunnel opening in 2025, and in line with Article 53 of the DCO, we have reviewed the user charges proposed for the Scheme.

In accordance with the CPAP, we have re-run the strategic traffic model (applying monitored data) taking into consideration the proposed user charges and carried out additional analysis. The outputs of this modelling and analysis have then been used to assess the effects of the proposed initial user charges on air quality, noise, socio-economic effects, in accordance with the approach adopted in the Environmental Statement submitted as part of the DCO.

Table 2 sets out the proposed user charges, and Table 3 sets out the proposed discounts and exemptions.

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<sup>3</sup> [Silvertown Tunnel Health and Equalities Impact Assessment \(April 2016\)](#)

**Table 2: Summary of proposed charge levels**

<b>Silvertown and Blackwall tunnels user charges – 06:00 to 22:00</b>			
	<b>Charges paid via Auto Pay</b>		<b>Charges paid via other channels</b>
	<b>Standard off-peak charges</b>	<b>Peak charges</b> Mon-Fri only Northbound 06:00 - 10:00, Southbound 16:00 - 19:00	<b>At all times</b>
Motorcycle, moped, motor tricycle	£1.50	£2.50	£2.50
Car and small van	£1.50	£4.00	£4.00
Large van	£2.50	£6.50	£6.50
Heavy Goods Vehicles	£5.00	£10.00	£10.00
Penalty Charge Notice for non-payment - £180 (Reduced to £90 if paid within two weeks)			

Discounts require annual renewals (with provision of relevant proofs or registration fees) except Blue Badge holders who are granted their discount in line with the expiry of their badge (up to three years from point of issue).

**Table 3: Proposed discounts, exemptions and reimbursements for the Silvertown and Blackwall tunnels user charges**

Discounts, exemptions and reimbursements	Eligibility Criteria
<b>50 per cent Discount</b>	
East London low-income residents' discount (for a period of at least three years)	To qualify individuals must live within an east London borough <sup>1</sup> and be in receipt of certain benefits <sup>2</sup> .
<b>£1 discount business discount on standard off-peak charges</b>	
Business discount (for a period of at least 12 months)	Eligible small businesses, sole traders and charities based in the host boroughs can register a maximum of three vehicles to receive a £1 discount on off-peak charges.
<b>100 per cent Discount</b>	
Recovery and breakdown vehicles	This discount applies to recovery and breakdown vehicles operated by organisations in the European Economic Area that are accredited to BS EN ISO9001:2008 (and in accordance with the specification for applying that standard to the industry).
Vehicles with 9+ seats	This discount applies to vehicles with nine seats or more (vehicles registered with the DVLA as a minibus, bus or coach will automatically receive a discount and will not need to apply for the discount).
Blue Badge holders	This discount applies to individuals who hold a valid Blue Badge in the European Economic Area.  Individuals can register up to two vehicles that would be used to travel though Silvertown or Blackwall Tunnels. This could be their own vehicle, or one they travel in.
Certain operational vehicles	This discount applies to qualifying organisations that operate vehicles performing certain essential public services including certain services provided by the host boroughs <sup>3</sup> . Eligibility is determined by TfL.

Waste collection and waste disposal vehicles used by east London boroughs <sup>4</sup>	This discount applies to vehicles being used by east London boroughs to provide waste collection and disposal services. Eligibility is determined by TfL.
Zero-Emission Capable and Wheelchair Accessible private hire vehicles (PHVs)	This discount applies to PHVs designated as wheelchair-accessible vehicles or zero emission capable as long as they are fulfilling a private hire booking and are licensed with London Taxi and Private Hire.
<b>Exemptions</b>	
Taxis	This exemption applies to taxis which are licensed with London Taxi and Private Hire.
Emergency services vehicles exempt from vehicle tax	This exemption applies to emergency service vehicles which are exempt from vehicle tax including ambulances, police vehicles and fire engines.
NHS vehicles exempt from vehicle tax	This exemption applies to NHS vehicles that are exempt from vehicle tax.
Vehicles in the disabled tax class	This exemption applies to vehicles used by disabled people that are exempt from vehicle tax.
Military vehicles in use	This exemption applies to vehicles currently used by the armed forces including visiting services or international organisations.
<b>Reimbursements<sup>5</sup></b>	
NHS Patient Reimbursement <sup>6</sup>	<p>NHS patients are eligible for reimbursement if:</p> <ol style="list-style-type: none"> <li>1. Clinically assessed as too ill, weak or disabled to travel to an appointment on public transport, and any of following apply: <ul style="list-style-type: none"> <li>• Have a compromised immune system (problems with your immune system)</li> <li>• Require regular therapy or assessment</li> <li>• Require recurrent surgical intervention</li> </ul> </li> </ol> <p>OR</p>

	<p>2. During an epidemic or pandemic prevalent in Greater London, are clinically assessed as being too vulnerable to infection to travel to an appointment on public transport.</p>
NHS Staff Reimbursement	<p>NHS staff members, are eligible for reimbursement if any of the following criteria is met:</p> <p>1. Those using their vehicles to carry any of the following:</p> <ul style="list-style-type: none"> <li>• Bulky, heavy or fragile equipment/supplies</li> <li>• Patients' notes or other confidential material</li> <li>• Controlled drugs</li> <li>• Clinical waste, contaminated sharps, radioactive materials or non-medicinal poisons</li> <li>• Prescription-only medicines or waste medicinal products</li> <li>• Clinical specimens, body fluids, tissues or organs</li> </ul> <p>OR</p> <p>2. Those responding to an emergency or other extraordinary circumstances when on call.</p>

It is proposed that the resident discount is a 50 per cent discount available to eligible residents in receipt of certain low-income benefits of east London boroughs<sup>4</sup> (east London low-income residents' discount).

The proposed qualifying benefits are:

- Income Support
- Income-related Employment & Support Allowance
- Income-based Jobseekers Allowance
- Universal Credit
- State Pension Credit
- Child Tax Credit

<sup>4</sup> London Borough of (LB) Barking & Dagenham, LB Bexley, LB Bromley, City of London Corporation, Royal Borough of (RB) Greenwich, LB Hackney, LB Havering, LB Lewisham, LB Newham, LB Redbridge, LB Southwark, LB Tower Hamlets, LB Waltham Forest

- Housing Benefit
- Working Tax Credit
- Carer's Allowance

Alongside these proposals sits a green and fair package of concessions and discounts to support local residents and businesses to shift to more sustainable alternatives and adapt to the new user charge. This package includes:

- New buses, with 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times (15 in the Silvertown Tunnel, six in the Blackwall Tunnel) including the Superloop bus route SL4
- A regular cross-river cycle shuttle-bus through the Silvertown Tunnel for cyclists, free for at least 12 months following Scheme opening
- Bus concessions to provide free pay as you go trips to support local residents to use the new cross-river bus services which will run through the tunnel (Route 108, 129 and SL4) for at least 12 months following Scheme opening
- DLR concessions to provide free pas as you go trips (refunded) to support local residents making journeys from King George V - Woolwich Arsenal and Island Gardens - Cutty Sark for at least 12 months following Scheme opening
- Eligible small businesses, sole traders and charities based in the host boroughs can register a maximum of three vehicles to receive a £1 discount on standard off-peak charges.

### 4.3 Purpose of EqIA

Assessing the impact of the proposed user charges in an EqIA enables us to understand how different groups are impacted and helps us to ensure inclusion and people are at the heart of our decision-making. It is also a way to demonstrate that we have complied with our statutory duty under the Equality Act 2010 – the Public Sector Equality Duty (PSED). The purpose of the EqIA is to assess the equality impacts (positive and/or negative) of the proposed user charges on people with protected characteristics.

As a public authority, we must ensure that decisions, policies, and projects do not unlawfully discriminate against any protected characteristics, to enhance opportunities and to foster good relationships between those with a protected characteristic and those without. The Equality Act identifies nine protected characteristics:

- Age
- Disability
- Sex
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion or belief
- Sexual orientation
- Marriage and civil partnerships

Marriage and Civil Partnership is not a relevant protected characteristic for the purposes of s. 149(1)(b)-(c) and has therefore not been included in this EqIA. While we have a duty to consider this protected characteristic, it is limited in application to discrimination in work and employment.

As a functional body of the Greater London Authority we have also considered the wider impacts of the Scheme on other groups who are disadvantaged in London, including:

- People on low incomes
- Refugees and asylum seekers
- Homeless people
- Carers (paid, voluntary, informal and PA's)

As a public authority, we have obligations under s.149 of the Equality Act, the PSED. The PSED requires that we have due regard to the need to:

- Eliminate unlawful discrimination, harassment, victimisation, and any other conduct prohibited by or under the Act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it by:
  - removing or minimising disadvantages experienced by people that are connected to that protected characteristics;
  - taking steps to meet the needs of people with protected characteristics that are different from the needs of people without the characteristic; and
  - encouraging people with protected characteristics to participate in public life or other activities in which participation by such people is disproportionately low.
- Foster good relations, between people who share a 'protected characteristic' and people who don't.

#### **4.3.1 Role of EqIA in Setting the User Charges**

As stated in Section 4.2.3 it is a requirement of the CPAP for the initial user charges to be set taking into consideration updated traffic modelling and analysis, and then re-assessing the impacts of the proposed initial user charges on achieving the Project Objectives. This has been done through the use of the User Charging Assessment Framework (UCAF). The UCAF has been used to help set the initial user charges, and has enabled us to assess the extent to which the proposed user charges are likely to:

- Achieve the Project Objectives; and
- Enable us to fulfil our other duties, including:
  - TfL's network management duty under the Traffic Management Act 2004
  - Compliance with other relevant legislation

The UCAF provides a means of assessing the potential user charges with regard to their impact on the Project Objectives.

Further information on the UCAF is contained in the [Supplementary Information](#) document.

As set out in Section 4.3, it is a requirement for us to have regard to our statutory duties under the PSED. An EqlA is a way to demonstrate compliance with these duties. The conclusions inform the UCAF and demonstrate compliance with 'other relevant legislation' when setting the proposed user charges.

Conversely, the findings of the UCAF in relation to the impact on the Project Objectives and the relevant assessment metrics inform the assessment undertaken as part of this EqlA.

Further information on how the EqlA feeds into the decision making on setting the proposed user charges can be found in the [Supplementary Information](#) document.

## 5 Consultation

Prior to the submission of the DCO application, a statutory consultation on the scheme took place (the Consultation Report for this formed part of the application). This was itself preceded by several non-statutory consultations starting in 2012 and has been followed by consultations on the bus network and provision for cyclists.

Further information on these consultations can be found in the [Supplementary Information](#) document.

The responses relating to equality received during the previous consultations were reviewed as part of the work in setting the proposed user charges.

As part of the process to set the initial user charges, a public consultation ran for eight weeks from 10 July 2024 to 3 September 2024 which sought views on the proposed initial user charges levels and our approach to discounts and exemptions.

A draft version of this EqlA was one of a number of documents which was published as part of this consultation, which were published on the dedicated [consultation webpage](#). The responses to this consultation were reviewed to inform the final decision on the user charges, taking into consideration the matters raised by protected characteristic and disadvantaged groups.

Furthermore, engagement was held with communities, stakeholders and organisations representing local residents, businesses, and protected characteristic and disadvantaged groups. This engagement alongside the responses received during the public consultation has been analysed and inform the final decision on the proposed user charges.

Full detail on the consultation we undertook, the stakeholders consulted and engaged with, and analysis of responses received is contained within our consultation report, which can be found on our [consultation webpage](#).



# 6 Impact Assessment Methodology

## 6.1 Scoping

### 6.1.1 People Scope

As discussed in Section 4.3, we have a duty under the PSED to look at the potential impact of proposals, policies and decisions on the protected characteristic groups under the Equality Act 2010. Additionally, as a functional body of the Greater London Authority, we need to consider the potential impact on people who are disadvantaged in London.

Taking these requirements into consideration, and how the proposed user charges could result in a change which has a disproportionate or differential effect on those people with a protected characteristic and disadvantaged groups in London, the following have been concluded as in scope for assessment as part of this EqIA (Table 4). As stated in Section 4.3, Marriage and Civil Partnership is not a relevant protected characteristic for the purposes of s. 149(1)(b)-(c) and has therefore not been included in this EqIA.

**Table 4: People Scope**

<b>People Groups</b>
Age
Disability
Religion or Belief
Gender Reassignment
Pregnancy & Maternity
Race
Sex
Sexual Orientation
People on low incomes (household income less than £20,000 per year)
Homeless People
Asylum Seeker & Refugees
Carers (paid, voluntary, informal and personal assistants)

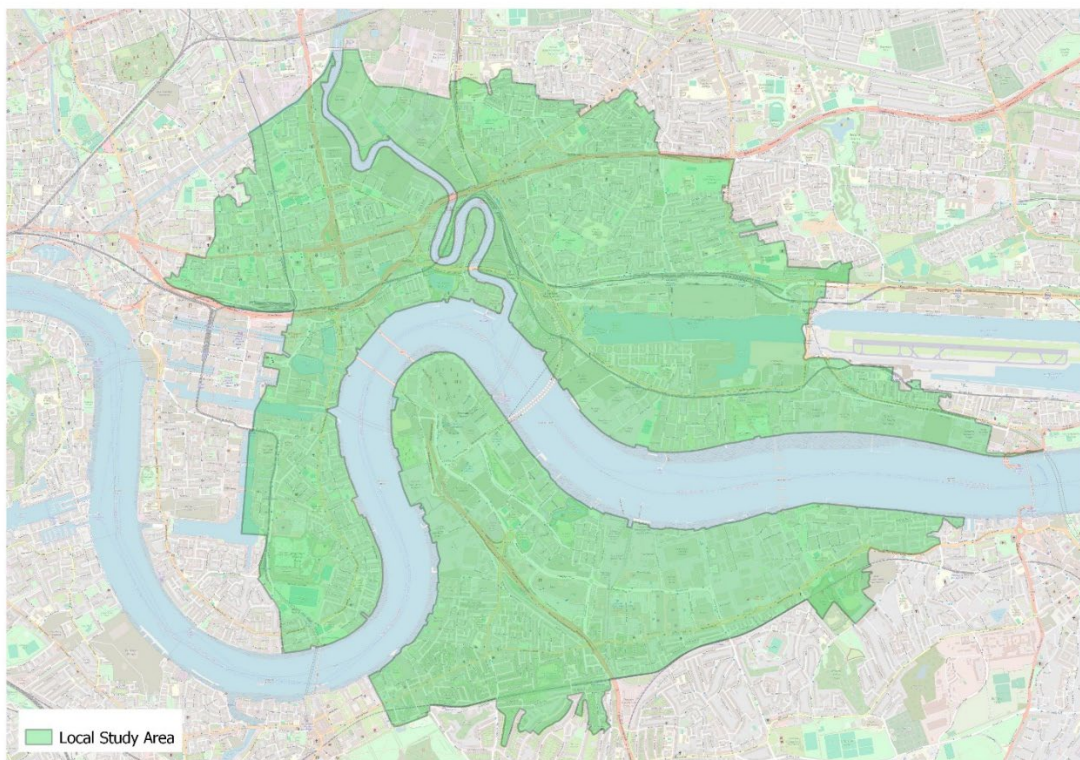
## 6.1.2 Spatial Scope

The Spatial Scope for this EqIA, as set out in Table 5 has been chosen to correspond with the areas identified in other assessments at DCO stage (the Local Study Area and Wider Borough Area), as well as factoring in the boroughs which make up the Silvertown Tunnel Implementation Group (STIG) and which have been considered as eligible for potential discounts (Sub-Region).

**Table 5: Spatial Scope**

Zone	Description
Local Study Area (LSA) (Figure 1)	Lower layer Super Output Areas (LSOAs) at the northern and southern portals, extending approximately 1km from each portal.
Host Borough Area (Figure 2)	The Host Borough Area comprises the three host boroughs of London Borough (LB) Newham, LB Tower Hamlets and Royal Borough of Greenwich.
Sub-Region (Figure 3)	The Sub-Region includes, in addition to the three host boroughs, the LBs of Barking and Dagenham, Bexley, Bromley, City of London, Southwark, Hackney, Havering, Lewisham, Redbridge and Waltham Forest.

**Figure 1: Local Study Area Map**



**Figure 2: Host Boroughs Map**



**Figure 3: Sub-Region Map**



## 6.2 Evidence Base

Baseline data has been collated from a range of sources to provide an overview of the characteristics of the different areas. It also includes research into the travel behaviour of specific groups. It includes journey purposes for certain groups to examine how it may differ from that of other groups and the wider population, to understand how the proposed initial user charges could affect certain groups with protected characteristics.

This provides an understanding of the local area and its facilities. Data on the community, health, and educational facilities within the LSA has been collated.

This provides greater context on the local communities surrounding the Silvertown and Blackwall tunnels and whether access to these facilities could be impacted by the initial user charges for certain groups.

Chapter 7 provides an analysis of this data.

Data has been gathered from a range of sources which provide accurate data on different protected characteristic and disadvantaged groups at the relevant spatial scales. Sources include:

- ONS Census data
- Indices of Multiple Deprivation
- DWP data
- London Travel Demand Survey (LTDS) data

Secondary research has also been undertaken to gather data and evidence on protected characteristic and disadvantaged groups from sources such as government publications, and publications and research by representative bodies, advocacy groups and charitable organisations. All sources of evidence have been provided in the footnotes where such data and evidence are presented.

## 6.3 Assessment Framework

As set out in Section 4.3, this EqlA is an assessment of the potential equality impacts of the proposed user charges including parameters such as charge levels (Table 2) and discounts and exemptions (Table 3).

The user charges manage demand at the tunnels and mitigate against the impacts of increased traffic and emissions on local communities, including those with protected characteristics and disadvantaged groups. This EqlA has reviewed the topics which were assessed in the HEqlA undertaken for the DCO application and considered which of these topics are relevant to assess the equality impacts of the initial user charges. This will help us to understand the impacts which could be experienced by protected characteristic and disadvantaged groups.

The topics set out in Table 6 have been determined as in scope for assessing the potential equality impacts of the proposed user charges:

**Table 6: Assessment Topics Scope**

Topic	Justification
Accessibility	<p>Accessibility affects how people live, socialise, spend recreation time, access services and work. These activities have a direct link to health and wellbeing.</p> <p>The range, availability, efficiency and affordability of transport modes to access key facilities are important, and the proposed user charges could potentially influence these.</p>
Access to Work and Training	<p>Access to work and training can have beneficial impacts on both the health and life prospects of local populations. The Scheme is located within some of the most economically deprived areas of London, with high levels of unemployment and people on low incomes.</p> <p>The proposed user charges aim to manage demand which should cause reductions in congestion and journey times for users of the tunnels. There is also the potential for the financial impacts of the proposed user charges to influence the ability for some groups to access work and training by certain modes. However, improvements to public transport may provide some mitigation.</p>
Access to Community Facilities	<p>Access to community facilities is important, particularly for multiple protected characteristic and disadvantaged groups. Community facilities can include Education and Healthcare Facilities, Community Centres, and Places of Worship. If the proposed user charges impact access to these facilities it could result in negative outcomes for impacted populations.</p>
Active Travel	<p>The proposed user charges may impact the mode people choose to travel by and could lead to an increase in walking and cycling, including as part of public transport journeys.</p> <p>The affordability of the charges could impact the use of active travel for certain groups to a greater extent than others.</p> <p>Changes in traffic levels and speeds resulting from the proposed user charges may impact perceptions of safety in certain locations and cause reductions in active travel, which may impact certain groups due to the location of these changes.</p>
Air Quality	<p>The Scheme aims to reduce congestion as a result of the provision of a new tunnel and to control increases in traffic through user charging. Changes in air quality can have a direct effect on exposure to pollutants and thereby the health and well-being of populations, including vulnerable populations and particular, groups with protected characteristics.</p>

Noise	Noise levels along key routes – both improvements to the current situation as well as increases in noise could occur as a result of the scheme and proposed user charges.  These changes may occur in locations which result in a greater impact on certain protected characteristics or disadvantaged groups.
Road Safety	Changes in traffic volume and patterns as a result of the proposed user charges may impact road safety. Vulnerable populations and equality groups may be particularly sensitive to changes in road safety.
Social Capital	Changes to social capital e.g. social links, networks, participation and satisfaction with living in an area could result due to the impact of the proposed user charges. The proposed user charges may impact severance as well as changes to the amenity of the area for local residents (for example from changes in noise and air quality).

Topics scoped out which were in scope for the HEqIA include access to open space and nature. This is because this topic was assessed for its impacts to/on access to existing areas of open space during the construction of the Silvertown Tunnel.

The topic of safety has also been amended to only assess road safety. In the HEqIA, the wider topic of 'safety' included both road safety and community safety as a result of changes to the local environment in the vicinity of the tunnel (for example lighting, CCTV). The latter has been scoped out as it is only relevant to the construction and design of the Silvertown Tunnel, not the user charges.

## 6.4 Quantification of Effects

To capture the effects on equality groups, the assessment has identified whether the impact is likely to have a disproportionate or differential effect, described as follows:

- **Disproportionate** – where there is a proportionately greater impact on members of an equality group than on other members of the general population in a particular area.
- **Differential** – an impact which affects members of an equality group differently from the rest of the general population because of specific needs or a recognised vulnerability.

The overall effect of the equality impacts identified will be measured against the following scale:

**Table 7: Scale of overall effect of equality impact**

<b>Scale of overall impact</b>	<b>Negative</b>	<b>Neutral</b>	<b>Positive</b>
<b>Rating</b>	-1	0	+1

## 7 Baseline

This Chapter sets out a description of the LSA north and south of the river. The Silvertown Tunnel will provide a new link connecting communities both sides of the river improving connectivity to jobs, services and community facilities.

This chapter also sets out an analysis of socio-economic and equality data within the LSA, host boroughs and the wider sub-region. This has been used to provide a summary of protected characteristic and disadvantaged groups and help to identify key issues.

### 7.1 Local Study Area Profile

Both the northern LSA and southern LSA comprise of a range of residential, commercial and industrial land uses, and are crossed by major road and rail infrastructure. The River Thames forms a further corridor of activity (both commercial and recreational) which causes severance between the two areas.

#### 7.1.1 The northern LSA

The northern LSA is dominated by the Royal Docks, which includes Gallions Point Marina, the ExCel Centre, the University of East London campus and London City Airport. Population in the vicinity of the Royal Docks area is focused in Silvertown, Canning Town and North Woolwich. The A1020 and A112 run west/east through this area, with primarily industrial and port related uses to the south and housing to the north. There is a local centre on the north side at Custom House. Silvertown Way (A1020) separates residential areas and the local centre from the Custom House DLR station.

Britannia Village, a residential area is located to the west of Silvertown. The Woolwich Ferry crosses the River Thames providing a link for cars, pedestrians and cyclists. Areas of public open space include the Royal Victoria Gardens and the Thames Barrier Park.

Residential areas to the north of the Royal Docks are focused at Custom House and Canning Town. Canning Town is bounded by Victoria Dock Road to the south and the A1011 to the west. Freemasons Road, which runs north/south through Canning Town is a local centre, with shops, cafes and businesses along much of its length. The A124 (Barking Road) provides a local shopping centre with a range of services and facilities. The River Lea, which heads north from the River Thames, is flanked by industrial uses on its eastern side. The DLR passes through Poplar with stations at Langdon Park, All Saints, Blackwall and East India.

The A13 East India Dock Road passes east/west through the Poplar area. West of its junction with the A102, the A13 acts as a busy community artery, with cafes, shops and community facilities. Poplar High Street includes food stores well as other local retail units runs east/west (and is also the route of Cycleway 3). The Isle of Dogs is located to the south of Aspen Way and includes the diverse areas of Canary Wharf (an extension of the Central London Central Business District) and local community focused areas such as Cubitt Town. The A1206 Prestons Road is the main access on the Isle of Dogs and to Cubitt Town. There is a local centre to the south near the Island Gardens DLR station.



Important areas of green space on the Isle of Dogs include Millwall Park and Mudchute Park and Farm.

### **7.1.2 The southern LSA**

The southern LSA is dominated by the Greenwich Peninsula which comprises mainly industrial, commercial and leisure uses. The O2 Arena at the northernmost tip of the Peninsula is a national entertainment venue and tourist attraction. It also provides local shops and services and is accessed by North Greenwich underground station (Jubilee Line), the IFS Cloud Cable Car and from North Greenwich Bus Station. There are large areas of car parking to the south, interspersed with light industrial and commercial uses.

The Greenwich Peninsula Masterplan sets out comprehensive redevelopment of former industrial and commercial land uses, with the Greenwich Millennium Village forming part of this redevelopment. Community facilities include Millennium Primary School and St Mary Magdalene Primary and Secondary Schools. The Greenwich Peninsula Ecology Park and an area of Metropolitan Open Land (MOL) on Millennium Way provide local open space for the residential community.

Residents from new housing developments on the Peninsula use the local facilities at The O2 Arena giving it a district centre role. The A206 (Trafalgar Road/Woolwich Road) passes west-east from Greenwich through New Charlton to Woolwich. Trafalgar Road is fronted by shops, businesses, restaurants and cafes between Greenwich and the A102. It forms a district centre for the local community with nearby residential areas including the community of Westcombe Park.

Residential areas straddle the A206 (Trafalgar Road) with the area to the north including suburban housing along Tunnel Avenue, Glenister Road and Blackwall Lane. The land uses to the north and south of the A206 (Woolwich Road) differ markedly. Land uses to the north principally comprise retail and leisure areas, for example the Millennium Leisure Park, Greenwich Shopping Park to the south of the A206 (Woolwich Road) are principally residential areas including Charlton and, further east, is the district centre of Woolwich.

### **7.1.3 Community Facilities**

Community Facilities in the LSA are comprised of:

- Places of worship
- Medical facilities
- Educational facilities
- Care institutions
- Community Centres

Figure 4 and Figure 5 show schools and other community facilities in the LSA.

Figure 4: Local Schools

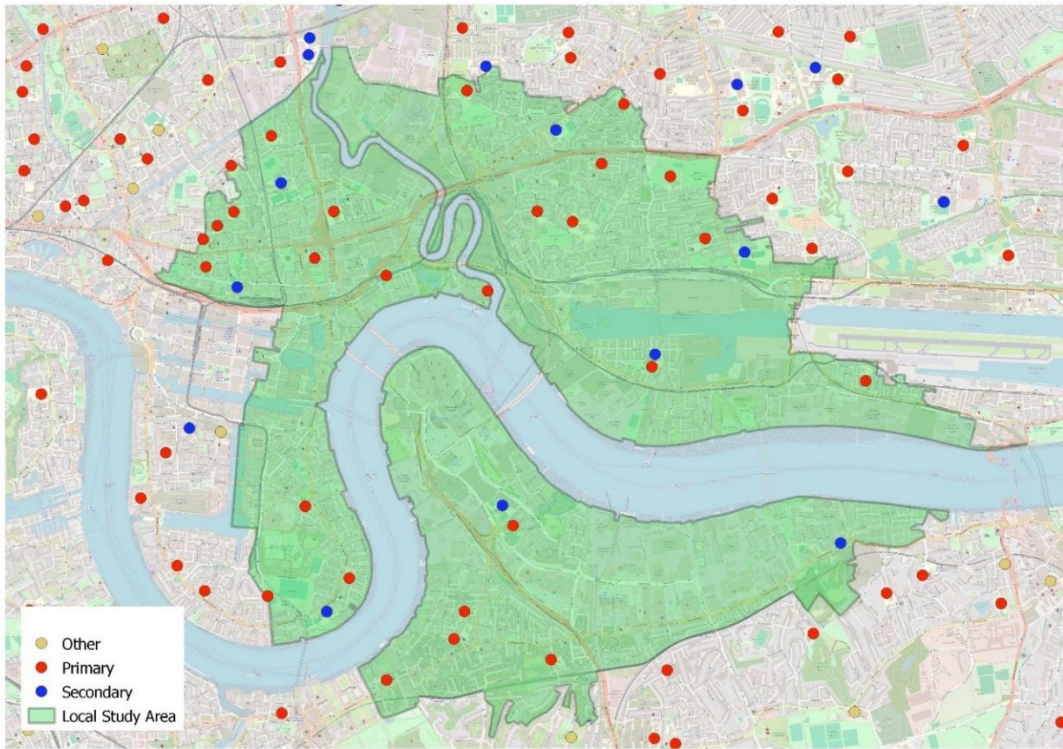
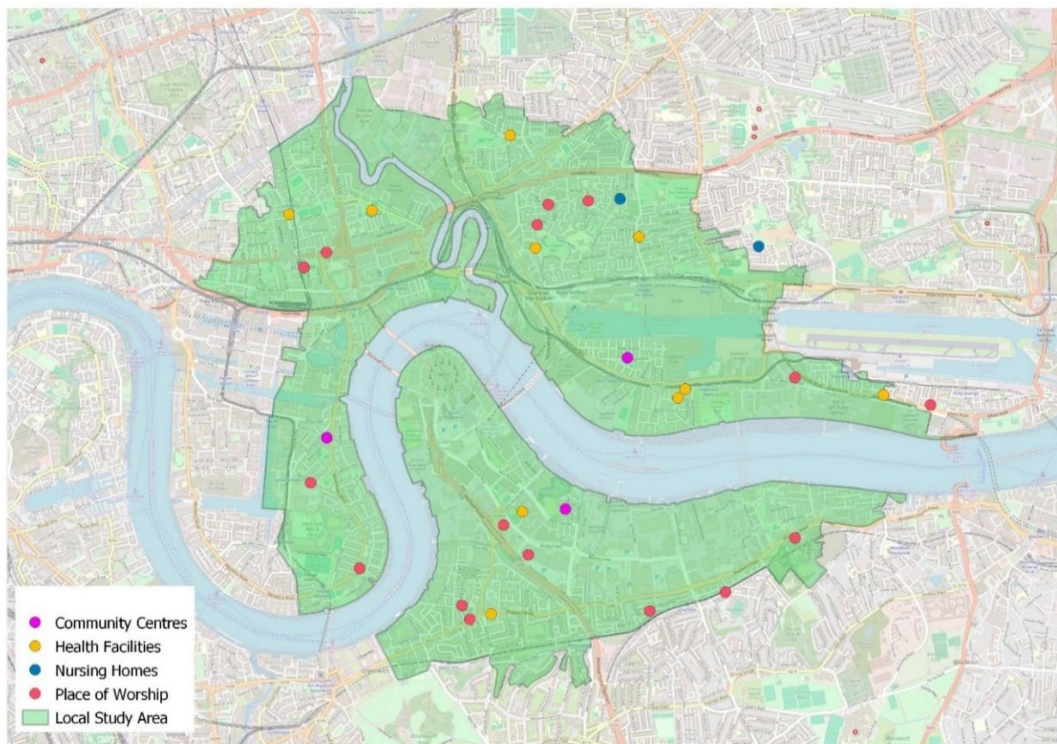


Figure 5: Local Community Facilities



## 7.2 Population Data

### 7.2.1 Population Statistics

According to the 2021 Census, the total population of the LSA is 123,800 with 93,470 north of the river and 30,330 south of the river.

The population of the host boroughs is 950,400. Newham is the most populous of the three host boroughs, with a population of 351,000. This is followed by Tower Hamlets and Greenwich, with populations of 310,300 and 289,100 respectively.

The population of the Sub-Region Area is 3,472,400, which is 40 per cent of London's total population.

**Table 8: Population Data<sup>5</sup>**

<b>Area</b>	<b>Total</b>
Greenwich	289,071
Newham	351,036
Tower Hamlets	310,306
<b>Sub-Region</b>	<b>3,472,396</b>
<b>Local Study Area (North)</b>	<b>93,469</b>
<b>Local Study Area (South)</b>	<b>30,334</b>
<b>London</b>	<b>8,799,725</b>

### 7.2.2 Car Ownership by borough

**Table 9: Car Ownership Data<sup>6</sup>**

<b>Area</b>	<b>Total</b>
Greenwich	35%
Newham	24%
Tower Hamlets	19%
<b>Sub-Region</b>	<b>34%</b>
<b>London</b>	<b>36%</b>

<sup>5</sup> ONS Census (2021)

<sup>6</sup> London Travel Demand Survey 2022/23

Car ownership levels vary across the host boroughs, Sub-Region and London (Table 9).

Data from the 2022/2023 London Travel Demand Survey<sup>7</sup> shows that 19 per cent of residents in Tower Hamlets own a personal car. This is lower than the proportion within Newham and Greenwich at 24 per cent and 36 per cent respectively. This is substantially lower than national levels of car ownership.

Average car ownership across the Sub-Region varies, with higher levels of car ownership in outer London boroughs. The average proportion of residents with a personal car in the Sub-Region is 34 per cent. This is slightly lower than the London-wide average of 36 per cent.

Cross-river car travel may also be by hire or car club vehicles and there are several car club vehicles / bays on either side of the Silvertown and Blackwall tunnels. It is not yet known whether operators will pass the proposed user charges onto customers.

### 7.2.3 Van Ownership by borough

Van ownership varies across the host boroughs and London and is comparatively low (Table 10).

**Table 10: Van ownership<sup>8</sup>**

<b>Area</b>	<b>Households with 1 or more vans</b>
Greenwich	2.2%
Newham	0.4%
Tower Hamlets	0.9%
<b>Sub-Region</b>	<b>3%</b>
<b>London</b>	<b>2%</b>

### 7.2.4 Motorcycle ownership by borough

Motorcycle ownership varies across the host boroughs and London and is comparatively low (Table 11).

<sup>7</sup> London Travel Demand Survey is an annual survey by TfL.

<sup>8</sup> London Travel Demand Survey 2022/23

**Table 11: Motorcycle ownership<sup>9</sup>**

<b>Area</b>	<b>Households with 1 or more motorcycles</b>
Greenwich	1%
Newham	3%
Tower Hamlets	4%
<b>Sub-Region</b>	<b>2%</b>
<b>London</b>	<b>3%</b>

### 7.2.5 Cross-River Travel in East/Southeast London

The Silvertown Tunnel Socio-Economic Monitoring Report<sup>10</sup> (May 2024) highlights some variation in trip purposes as seen in Table 12.

64 per cent of residents from Greenwich and 43 per cent from Newham cross the river at least once a week for any purpose compared to 22 per cent in Tower Hamlets. Cross-river commuting, leisure trips and journeys for shopping or personal business are higher in Greenwich compared to Newham and Tower Hamlets.

**Table 12: Travelling for journey purposes across the River Thames in East/ Southeast London at least once a week – by borough of residence<sup>11</sup>**

	<b>Greenwich (n=131)</b>	<b>Newham (n=256)</b>	<b>Tower Hamlets (n=221)</b>
<b>Travel to work (commuting)</b>	49%	32%	12%
<b>Travel for work (business)</b>	18%	15%	4%
<b>Travel to education</b>	5%	8%	2%
<b>Travel for shopping and personal business</b>	24%	10%	6%
<b>Leisure</b>	30%	15%	8%
<b>Other reasons</b>	5%	7%	0%

<sup>9</sup> London Travel Demand Survey 2022/23

<sup>10</sup> TfL, [Silvertown Tunnel socio-economic monitoring: year 2](#) (May 2024)

<sup>11</sup> TfL, Silvertown Tunnel socio-economic monitoring (May 2024); resident surveys; Q2 'How often do you travel across the River Thames in east/southeast London for [purpose]?', 2023 (base sizes as above)

<b>One day a week or more for any purpose</b>	64%	43%	22%
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As shown in Table 13 people are more likely to cross the river regularly for travel for work purposes. However, the proportion who make daily journeys for any purpose is small.

**Table 13: Frequency of travelling for different purposes across the River Thames in East/Southeast London among those who make any journey type<sup>12</sup>**

	<b>Travel for work (commuting)</b>	<b>Travel for work (business)</b>	<b>Travel for shopping and personal business</b>	<b>Travel to education</b>	<b>Leisure</b>	<b>Other reasons</b>
<b>Every day</b>	13%	2%	0%	4%	0%	0%
<b>3-4 times per week</b>	14%	18%	1%	18%	2%	0%
<b>2 days per week</b>	9%	9%	4%	9%	4%	1%
<b>1 day per week</b>	5%	8%	8%	1%	11%	9%
<b>A few days per month</b>	2%	6%	9%	0%	9%	3%
<b>Less than one day per month</b>	8%	19%	33%	5	41%	26%
<b>Not applicable</b>	48%	37%	43%	62%	31%	38%
<b>Don't know</b>	0%	1%	0%	0%	1%	23%

As part of the public consultation, we asked respondents how often they currently use the Blackwall Tunnel. 46 per cent of respondents use the tunnel at least once a week, 11 per cent use the tunnel every day and six per cent only use the Blackwall Tunnel at the weekend. We also asked respondents which statement best met their future travel

<sup>12</sup> TfL, Silvertown Tunnel socio-economic monitoring (May 2024); resident surveys; Q2 'How often do you travel across the River Thames in east/southeast London for [purpose]?', 2023 (base sizes vary from n= 117 to 964).

intentions when the Silvertown Tunnel opens. 44 per cent of respondents intend to partially switch their journeys from the Blackwall Tunnel to the Silvertown Tunnel and 34 per cent of respondents have no intention of switching their journeys from the Blackwall Tunnel to the Silvertown Tunnel.

## 7.3 Age

### 7.3.1 Age Profile

As shown in Table 14, the age distribution across all spatial scales is largely similar. However, the northern LSA has a greater proportion of people aged 25-29.

The proportion of people aged 25-29 is greater in Tower Hamlets compared to Greenwich and Newham as well as, the wider Sub-Region and London.

**Table 14: Approximate proportion of residents by age<sup>13</sup>**

Age	LSA (North)	LSA (South)	Greenwich	Newham	Tower Hamlets	Sub-Region	London
0 to 4	6%	7%	7%	7%	6%	6%	6%
5 to 9	6%	6%	6%	7%	6%	6%	6%
10 to 14	6%	5%	6%	7%	6%	6%	6%
15 to 19	6%	4%	5%	6%	6%	6%	6%
20 to 24	9%	7%	6%	8%	10%	7%	7%
25 to 29	15%	13%	9%	10%	14%	9%	9%
30 to 34	14%	15%	10%	10%	13%	10%	9%
35 to 39	10%	12%	9%	9%	10%	9%	8%
40 to 44	7%	8%	8%	8%	7%	8%	8%
45 to 49	5%	6%	7%	6%	6%	7%	7%
50 to 54	5%	5%	7%	6%	4%	6%	7%
55 to 59	4%	4%	6%	5%	3%	6%	6%
60 to 64	3%	3%	4%	4%	3%	4%	5%
65 to 69	2%	2%	3%	3%	2%	3%	3%
70 to 74	1%	2%	3%	2%	1%	3%	3%

<sup>13</sup> ONS Census (2021), TS007A - Age by five-year age bands

<b>75 to 79</b>	1%	1%	2%	1%	1%	2%	2%
<b>80 to 84</b>	1%	1%	1%	1%	1%	1%	2%
<b>85 +</b>	1%	1%	1%	1%	1%	1%	2%

### 7.3.2 Travel Mode by Age

As shown in Table 15, young people aged between 0-15 are more likely to be car passengers than any other age group.

The most common mode of travel for people aged 16-24 after walking is the bus, with 72 per cent using this mode at least once per week – higher than for any other age group. Only 14 per cent of people in this age group drive at least once per week<sup>14</sup>, which is significantly lower than the preceding age groups.

People aged 24-44 are more likely to travel by rail (Underground, Overground, National Rail).

Mode share is similar between people aged 45-59 and 60-64. However, people aged 60-64 are more likely to use the bus, and less likely to cycle.

People aged 65 and over travel by all modes less frequently than other people aged 16 and above. Although walking is the most common mode of travel of this age group, at 84 per cent, this is around 10 per cent lower than the other age groups.

**Table 15: Proportion of Londoners using modes of travel at least once per week, by age<sup>15</sup>**

<b>Mode</b>	<b>Age 0-15 years</b>	<b>Age 16-24</b>	<b>Age 25-44</b>	<b>Age 45-59</b>	<b>Age 60-64</b>	<b>Age 65+</b>
<b>Bus</b>	56%	72%	55%	48%	59%	52%
<b>Walking</b>	97%	96%	97%	94%	95%	84%
<b>Car (Driver)</b>	0%	14%	40%	54%	54%	43%
<b>Car (Passenger)</b>	67%	42%	33%	33%	34%	34%
<b>London Underground</b>	16%	50%	53%	37%	34%	22%
<b>National Rail</b>	6%	18%	19%	15%	13%	9%
<b>London Overground</b>	6%	17%	18%	12%	10%	6%

<sup>14</sup> 16 year olds on higher rate of Disability Living Allowance are legally allowed to drive.

<sup>15</sup> LTDS 2022/23



<b>DLR</b>	3%	7%	6%	5%	4%	2%
<b>Tram</b>	2%	3%	2%	1%	1%	1%
<b>PHV</b>	5%	17%	14%	9%	5%	5%
<b>Taxi</b>	1%	1%	2%	3%	2%	1%
<b>Motorcycle</b>	0%	1%	1%	2%	1%	0%
<b>Pedal Cycle</b>	13%	9%	15%	14%	9%	4%

According to previous TfL research<sup>16</sup>, 16-24 year olds are more likely to feel worried about their personal security (i.e. being safe from, crime or antisocial behaviour) when travelling by public transport.

16-24 year olds are also more likely than other age groups to have experienced unwanted sexual behaviour while using public transport. 18 per cent said they had personally experienced unwanted sexual behaviour compared with 10 per cent of all Londoners.

### 7.3.3 Cross-River Travel in East/Southeast London

According to the Silvertown Tunnel Socio-Economic Monitoring Report (May 2024), cross-river trips for any purpose decreases with age (41 per cent among under 35s compared to 22 per cent of those aged 65+).

Overall, people aged between 35-64 were most likely to cross the Thames by car (as a driver or passenger). Public transport had larger shares across all age groups, in particular among younger people (under 35s) and 55-64s.

**Table 16: Travelling for journey purposes across the River Thames in East/ Southeast London at least once a week, by age group<sup>17</sup>**

	<b>16-34 (n=426)</b>	<b>35-44 (n=221)</b>	<b>45-54 (n=160)</b>	<b>55-64 (n=129)</b>	<b>65+ (n=91)</b>
<b>Travel to work (commuting)</b>	30%	34%	28%	22%	3%
<b>Travel for work (business)</b>	10%	10%	14%	9%	0%
<b>Travel to education</b>	8%	2%	0%	1%	0%

<sup>16</sup> TfL (2019), [Travel in London: Understanding our diverse communities](#)

<sup>17</sup> TfL, Silvertown Tunnel socio-economic monitoring (May 2024); resident surveys; Q2 'How often do you travel across the River Thames in east/southeast London for [purpose]?', 2023 (base sizes as above)

<b>Travel for shopping and personal business</b>	12%	10%	14%	16%	14%
<b>Leisure</b>	17%	17%	13%	12%	18%
<b>Other reasons</b>	3%	4%	3%	3%	3%
<b>One day a week or more for any purpose</b>	41%	40%	36%	35%	22%

The analysis of the responses to the public consultation found that people aged 25 years and under were more likely to use the London Underground, London Overground or Rail (73 per cent) compared to people aged over 25 years (49 per cent), and respondents aged between 26 and 55 were more likely to use the Blackwall Tunnel at least weekly (56 per cent) than those aged 56 and over (39 per cent).

When the Silvertown Tunnel opens, respondents aged 25 and under were more likely to say that they do not intend to use either tunnel (29 per cent) than those in older age groups (16 per cent), and respondents aged under 35 were more likely to say that they intend to use new public transport options (28 per cent) compared to those aged between 46 and over (19 per cent).

Respondents aged 26 and above were more likely to have an Auto Pay account (32 per cent) than those aged 25 and below (14 per cent), which may correlate with the lower current and intended use of the tunnels by individuals in this age range.

## 7.4 Sex

### 7.4.1 Sex Profile

The gender split between men and women is similar within the host boroughs, Sub-Region, and London (see Table 17).

**Table 17: Sex Profile<sup>18</sup>**

<b>Area</b>	<b>Women</b>	<b>Men</b>
Greenwich	51%	49%
Newham	50%	50%
Tower Hamlets	50%	50%
<b>Sub-Region</b>	<b>51%</b>	<b>49%</b>
<b>Local Study Area (North)</b>	<b>50%</b>	<b>50%</b>

<sup>18</sup> ONS Census (2021), TS008 - Sex

<b>Local Study Area (South)</b>	<b>51%</b>	<b>49%</b>
<b>London</b>	<b>51%</b>	<b>49%</b>

### 7.4.2 Travel Mode by Sex

As shown in Table 18, women in London are more likely than men to travel by bus. However, men are more likely to travel by car as a driver, while women are more likely to be a passenger.

Women are also much less likely to cycle, with only eight per cent reporting using this mode at least once per week compared to 17 per cent of men.

**Table 18: Proportion of Londoners using modes of travel at least once per week, by sex<sup>19</sup>.**

<b>Mode</b>	<b>Men</b>	<b>Women</b>
Bus	53%	58%
Walking	95%	94%
Car (Driver)	40%	30%
Car (Passenger)	33%	45%
London Underground	42%	37%
National Rail	16%	14%
London Overground	14%	12%
DLR	5%	5%
Tram	2%	2%
PHV	10%	11%
Taxi	2%	2%
Motorcycle	2%	0%
Pedal Cycle	17%	8%

According to previous TfL research<sup>20</sup>, women are more likely than men to be travelling with buggies and/or shopping, and to be travelling with children. For this reason, the car is often

<sup>19</sup> LTDS 2022/23

<sup>20</sup> [TfL \(2019\), Travel in London: Understanding our diverse communities](#)

seen as convenient. However, the cost and stress associated with driving means that some women prefer to use public transport.

Women are more likely to be worried about personal security (i.e. being safe from crime or antisocial behaviour) while using public transport in London, and are also more likely to have experienced unwanted sexual behaviour while using public transport. However, the mean number of incidents experienced in the past three months is the same among women and men (both 2.7 incidents on average).

### 7.4.3 Cross-River Travel in East/Southeast London

According to the Silvertown Socio-Economic Monitoring Report (May 2024), men were more likely than women to cross the river for all purposes except shopping/personal business, although the difference was small for this purpose. For commuting and business travel, the share of men crossing was significantly higher compared to women.

In general, men were more likely than women to use the car, in particular as a driver, to cross the river for all purposes on one or more days a week, while women were much more likely than men to be a passenger. They were also much more likely than men to travel by public transport, in particular using National Rail services (21 per cent compared to 12 per cent of men).

**Table 19: Travelling for journey purposes across the River Thames in East/ Southeast London at least once a week – by sex<sup>21</sup>**

	<b>All (n=1027)</b>	<b>Men (n=531)</b>	<b>Women (n=496)</b>
<b>Travel to work (commuting)</b>	27%	32%	21%
<b>Travel for work (business)</b>	10%	13%	6%
<b>Travel to education</b>	4%	4%	3%
<b>Travel for shopping and personal business</b>	13%	12%	13%
<b>Leisure</b>	16%	17%	14%
<b>Other reasons</b>	3%	4%	3%
<b>One day a week or more for any purpose</b>	38%	43%	32%

<sup>21</sup> TfL, Silvertown Tunnel socio-economic monitoring (May 2024); resident surveys; Q2 'How often do you travel across the River Thames in east/southeast London for [purpose]?', 2023 (base sizes as above)

## 7.5 Fertility Rates

General Fertility Rate (GFR) is the number of live births per 1,000 women of child-bearing age ('child-bearing age' is taken as ages 15-44 inclusive for the purposes of calculating the rate).

As shown in Table 20, the GFR in Tower Hamlets, at 45.8, is lower than the London-wide GFR of 52.7. The GFR in Greenwich and Newham is higher than the London-wide average, at 55.8 and 58.9 respectively. The Sub-region average is closer to the London-wide average, at 53.3.

**Table 20: General Fertility Rates** <sup>22</sup>

<b>Area</b>	<b>General Fertility Rate</b>
Greenwich	55.8
Newham	58.9
Tower Hamlets	45.8
<b>Sub-Region</b>	<b>53.3</b>
<b>London</b>	<b>52.7</b>

## 7.6 Religion or Belief

### 7.6.1 Religion or Belief Profile

There is a high level of diversity of religion or belief across the LSA, the three host boroughs and the Sub-Region, as demonstrated in Table 21.

In the northern LSA, Christians are the most common religious group with 34 per cent of residents reporting this as their religion at the 2021 Census. This is followed by Muslims at 29 per cent, and 24 per cent reported having no religion or belief.

In the southern LSA, while the prevalence of Christians is similar to the northern LSA at 38 per cent, the proportion of residents reporting as Muslim is significantly lower at eight per cent. A higher proportion of residents in this area have no religion or belief, at 39 per cent.

These differences between religious identities can also be seen across the three host boroughs. 40 per cent of Tower Hamlets residents are Muslim, compared to 35 per cent in Newham and nine per cent in Greenwich.

Conversely, 45 per cent of residents in Greenwich are Christian, compared to 35 per cent in Newham and 22 per cent in Tower Hamlets.

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<sup>22</sup> ONS (2021), Live births in England and Wales: birth rates down to local authority areas

33 per cent of residents in Greenwich have no religion or belief, compared to 27 per cent in Tower Hamlets and 14 per cent in Newham.

Across the Sub-Region, Christians are the most common religious group, at 40 per cent. 17 per cent of residents are Muslim whilst 29 per cent have no religion. This is similar to the religious identities London-wide, with 41 per cent Christians, 17 per cent Muslims, and 29 per cent reporting no religion.

**Table 21: Resident Population by religion or belief<sup>23</sup>**

Area	No religion	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religion	N/A
Greenwich	33%	45%	2%	4%	0%	9%	1%	1%	6%
Newham	14%	35%	1%	6%	0%	35%	2%	1%	7%
Tower Hamlets	27%	22%	1%	2%	0%	40%	0%	1%	7%
<b>Sub-Region</b>	<b>29%</b>	<b>40%</b>	<b>1%</b>	<b>3%</b>	<b>1%</b>	<b>17%</b>	<b>1%</b>	<b>1%</b>	<b>7%</b>
<b>Local Study Area (North)</b>	<b>24%</b>	<b>34%</b>	<b>1%</b>	<b>4%</b>	<b>0%</b>	<b>29%</b>	<b>1%</b>	<b>1%</b>	<b>7%</b>
<b>Local Study Area (South)</b>	<b>39%</b>	<b>38%</b>	<b>1%</b>	<b>4%</b>	<b>0%</b>	<b>8%</b>	<b>1%</b>	<b>1%</b>	<b>7%</b>
<b>London</b>	<b>27%</b>	<b>41%</b>	<b>1%</b>	<b>5%</b>	<b>2%</b>	<b>15%</b>	<b>2%</b>	<b>1%</b>	<b>7%</b>

## 7.7 Race

### 7.7.1 Race Profile

The 2021 Census data shows that the northern LSA has a greater level of racial diversity compared to the southern LSA.

In the southern LSA, over half (58 per cent) of the population is White, with 16 per cent Black and 14 per cent Asian. By contrast, 39 per cent are White in the northern LSA, while 35 per cent are Asian and 16 per cent are Black.

<sup>23</sup> ONS Census (2021), TS030 - Religion

In both Newham and Tower Hamlets, the most common race reported by residents is Asian, at 42 per cent of the population in Newham and 44 per cent in Tower Hamlets. This is significantly higher than in Greenwich, where 13 per cent of the population is Asian.

The Asian population in the Sub-Region is 22 per cent, which is similar to the London-wide Asian population of 21 per cent.

In Tower Hamlets, seven per cent of the population is Black. This is lower than Greenwich (21 per cent), Newham (17 per cent), the Sub-Region (16 per cent) and London (14 per cent).

Due to the greater levels of racial diversity in Newham and Tower Hamlets, the White population in these boroughs, at 31 per cent and 39 per cent respectively, is lower than in Greenwich. At 56 per cent, the White population in Greenwich is similar to the Sub-Region (53 per cent) and London (54 per cent).

Less than one per cent of the population are Gypsies or Irish Travellers in the LSA, host boroughs, and Sub-region.

Around one per cent of population in the area of the northern LSA is Roma, which is similar to the Roma Population in Tower Hamlets. In all other areas, less than one per cent of the population is Roma.

**Table 22: Resident Population by Race<sup>24</sup>**

Area	Asian	Black	Mixed	White	Other
Greenwich	13%	21%	56%	6%	4%
Newham	42%	17%	31%	5%	5%
Tower Hamlets	44%	7%	39%	5%	4%
<b>Sub-Region</b>	22%	16%	53%	5%	5%
<b>Local Study Area (North)</b>	35%	16%	39%	6%	4%
<b>Local Study Area (South)</b>	15%	16%	58%	7%	4%
<b>London</b>	21%	14%	54%	6%	6%

### 7.7.2 Travel Mode by Race

Table 23 highlights that Black Londoners are less likely to drive than other Londoners, but more likely to use the bus, DLR and PHVs.

Asian Londoners are more likely to travel by car as a passenger, and less likely to travel by rail modes (London Underground, Overground, National Rail).

<sup>24</sup> ONS Census (2021), TS021 - Ethnic group

Black and Asian Londoners are over 50 per cent less likely to cycle than White Londoners (seven per cent compared to 15 per cent).

**Table 23: Proportion of Londoners using modes of travel at least once per week, by race<sup>25</sup>**

<b>Mode</b>	<b>White</b>	<b>Mixed, Other and Arab</b>	<b>Asian</b>	<b>Black</b>
<b>Bus</b>	52%	56%	52%	69%
<b>Walking</b>	95%	93%	94%	94%
<b>Car (Driver)</b>	38%	30%	37%	27%
<b>Car (Passenger)</b>	38%	38%	46%	38%
<b>London Underground</b>	41%	37%	36%	40%
<b>National Rail</b>	17%	13%	11%	14%
<b>London Overground</b>	13%	12%	7%	18%
<b>DLR</b>	3%	6%	7%	8%
<b>Tram</b>	1%	3%	1%	3%
<b>PHV</b>	10%	11%	7%	14%
<b>Taxi</b>	2%	1%	1%	1%
<b>Motorcycle</b>	1%	1%	1%	1%
<b>Bicycle</b>	15%	12%	7%	7%

According to previous research<sup>26</sup>, Black, Asian and minority ethnic Londoners are more likely than white Londoners be worried about their personal security (i.e. being safe from crime or antisocial behaviour) while using public transport.

Black, Asian and minority ethnic Londoners are also more likely than white Londoners to have experienced hate crime targeted at themselves or witnessed it in the past year (27 per cent compared with 19 per cent). The proportion rises to 32 per cent among mixed ethnicity Londoners.

<sup>25</sup> LTDS 2022/23

<sup>26</sup> [TfL \(2019\), Travel in London: Understanding our diverse communities](#)



### 7.7.3 Car Ownership by Race

LTDS Data from 2022/2023 highlights that car ownership levels vary by race within the host boroughs, Sub-Region and London.

In Greenwich, residents reporting as ‘mixed, other and Arab’ are most likely to own a personal car, at 63 per cent. This is followed by White residents (41 per cent), Asian (29 per cent) and Black (24 per cent).

In Newham, Black residents are most likely to own a car, at 26 per cent. This is marginally higher than for all other racial groups, at 23 per cent.

In Tower Hamlets 24 per cent of Asian residents own a car. This is relatively greater than car ownership levels for White and Mixed, Other and Arab residents, both at 17 per cent. Black residents in Tower Hamlets are least likely to own a car, at 14 per cent.

### 7.7.4 Cross-River Travel in East/Southeast London

According to the Silvertown Tunnel Socio-Economic Monitoring Report (May 2024), White residents were more likely to cross the river for any trip type once a week or more. Asian residents and people from Mixed/Chinese/Other racial groups were more likely than average to travel across the river for education.

Across all purposes, car use (as a driver or passenger) was higher for Asian and Black residents than others. Consequently, public transport use was relatively low for these groups. Cycling was higher among White residents (six per cent compared to no respondents in the Black or Asian subgroups).

**Table 24: Travelling for journey purposes across the River Thames in East/ Southeast London at least once a week – by ethnicity<sup>27</sup>**

	All (n=1027)	Asian (n=239)	Black (n=145)	Mixed/ Chinese/ Other (n=84)	White (n=558)
<b>Travel to work (commuting)</b>	27%	23%	26%	27%	29%
<b>Travel for work (business)</b>	10%	12%	8%	6%	10%
<b>Travel to education</b>	4%	7%	4%	6%	2%
<b>Travel for shopping and personal business</b>	13%	9%	7%	11%	16%

<sup>27</sup> TfL, Silvertown Tunnel socio-economic monitoring (May 2024); resident surveys; Q2 ‘How often do you travel across the River Thames in east/southeast London for [purpose]?’, 2023 (base sizes as above)

<b>Leisure</b>	16%	12%	7%	15%	20%
<b>Other reasons</b>	3%	4%	4%	2%	3%
<b>One day a week or more for any purpose</b>	38%	34%	34%	38%	40%

Analysis of the responses to the consultation found that Black, Asian and other Ethnic groups were more likely to use the bus (20 per cent) compared to White respondents (13 per cent), and Black, Asian and Other Ethnic Group respondents were more likely to use the Tunnel 2-3 times a week or more (38 per cent) than White respondents (24 per cent).

When the Silvertown Tunnel opens, Black, Asian and Other Ethnic Group respondents have a greater intention to use the Silvertown Tunnel at least once a week or more (31 per cent) than White respondents (17 per cent).

## 7.8 Sexual Orientation and Gender Reassignment (LGBT)

We recognise that sexual orientation and gender identity are two separate protected characteristics under the Equality Act 2010, however data sources often merge the two under the ‘umbrella’ term ‘LGBT’ (lesbian, gay, bisexual, transgender).

The Equality Act 2010 uses the term ‘transsexual’ for individuals who have the protected characteristic of gender reassignment. We recognise that some people consider this term outdated, so we have used the term ‘trans’ to refer to a person who has the protected characteristic of gender reassignment. However, we note that some people who identify as trans may not fall within the legal definition.

A person can be at any stage in the transition process, from proposing to reassign their sex, undergoing a process of reassignment, or having completed it. This can therefore make it difficult to accurately quantify the number of people who are protected under the Equality Act due to their gender reassignment at a local level. Census data on the proportion of people identifying as trans is therefore a useful proxy for this data.

The 2021 Census data shows that four per cent of residents aged 16 and over in Tower Hamlets are Gay or Lesbian and three per cent are Bisexual. This is marginally higher than in Greenwich and Newham, and the Sub-Region and London levels.

**Table 25: Sexual Orientation of Population<sup>28</sup>**

<b>Area</b>	<b>Straight or Heterosexual</b>	<b>Gay or Lesbian</b>	<b>Bisexual</b>	<b>All other sexual orientations</b>	<b>Not answered</b>
Greenwich	87%	2%	1%	<1%	9%

<sup>28</sup> ONS Census (2021), TS077 - Sexual orientation

Newham	85%	2%	2%	<1%	11%
Tower Hamlets	83%	4%	3%	<1%	10%
<b>Sub-Region</b>	86%	2%	2%	<1%	9%
<b>London</b>	86%	2%	2%	<1%	10%

The Census data in Table 26 shows that less than one per cent of the population identify as trans in the host boroughs, sub-region and London.

**Table 26: Resident Population by Gender Identity and Trans Status<sup>29</sup>**

<b>Area</b>	<b>Gender identity the same as sex registered at birth</b>	<b>Gender identity different from sex registered at birth but no specific identity given</b>	<b>Trans woman</b>	<b>Trans man</b>	<b>All other gender identities</b>	<b>Not answered</b>
Greenwich	92.0%	0.4%	0.2%	0.2%	0.1%	7.2%
Newham	88.5%	0.9%	0.2%	0.3%	0.1%	10.0%
Tower Hamlets	90.7%	0.6%	0.1%	0.1%	0.2%	8.3%
<b>Sub-Region</b>	<b>91.7%</b>	<b>0.4%</b>	<b>0.2%</b>	<b>0.2%</b>	<b>0.1%</b>	<b>7.4%</b>
<b>London</b>	<b>91.2%</b>	<b>0.5%</b>	<b>0.2%</b>	<b>0.2%</b>	<b>0.1%</b>	<b>7.9%</b>

According to previous research<sup>30</sup>, LGBT Londoners are more likely to have been subjected to sexual comments or sexual gestures when using public transport compared to heterosexual and/or cisgender Londoners and are more likely to have experienced or witnessed hate crime.

Fear of intimidation and/or abuse are potential barriers to public transport use, and modifications to travel behaviour as a result of such fears are thought to depend on many factors, including people's personalities, previous experiences and the degree to which they perceive themselves as visibly LGBT.

<sup>29</sup> ONS Census (2021), TS078 - Gender identity

<sup>30</sup> [TfL \(2019\), Travel in London: Understanding our diverse communities](#)

## 7.9 Disability

### 7.9.1 Disability Profile

Under the Equality Act 2010, a disability is classified as a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on the ability of an individual to do normal daily activities. 'Substantial' is more than minor or trivial, for example, it takes much longer than it usually would to complete a daily task like getting dressed. 'Long-term' means 12 months or more, for example a breathing condition that develops as a result of a lung infection.

A progressive condition is one that gets worse over time. People with progressive conditions can be classed as disabled. However, an individual automatically meets the disability definition under the Equality Act 2010 from the day they are diagnosed with HIV infection, cancer or multiple sclerosis.<sup>31</sup>

As shown in Table 27, disability rates are similar in across all of the spatial areas.

**Table 27: Resident Population by Disability<sup>32</sup>**

<b>Area</b>	<b>Disabled under the Equality Act</b>	<b>Not disabled under the Equality Act</b>
Greenwich	14%	86%
Newham	12%	88%
Tower Hamlets	13%	87%
<b>Sub-Region</b>	<b>14%</b>	<b>86%</b>
<b>Local Study Area (North)</b>	<b>12%</b>	<b>88%</b>
<b>Local Study Area (South)</b>	<b>11%</b>	<b>89%</b>
<b>London</b>	<b>13%</b>	<b>87%</b>

### 7.9.2 Travel Mode by Disability

As shown in Table 28, disabled Londoners are less likely to travel by all modes compared to non-disabled Londoners.

<sup>31</sup> [GOV, Definition of disability under the Equality Act 2010](#)

<sup>32</sup> ONS Census (2021), TS038 - Disability

Similar to non-disabled Londoners, walking and bus are the two most commonly used modes. However, for disabled Londoners car as a passenger is the third most common, which is fourth for non-disabled people.

Disabled people are much less likely to use rail modes (London Underground, Overground, National Rail).

Taxi and PHV use are similar for disabled and non-disabled Londoners. However, 17 per cent of disabled people in the host boroughs and 13 per cent in Sub-region travel by PHV at least once per week. This is greater than the use by non-disabled people in these areas by ten per cent.

**Table 28: Proportion of Londoners using modes of travel at least once per week, by disability<sup>33</sup>**

<b>Mode</b>	<b>Disabled</b>	<b>Non-Disabled</b>
<b>Bus</b>	44%	57%
<b>Walking</b>	73%	96%
<b>Car (Driver)</b>	25%	36%
<b>Car (Passenger)</b>	35%	39%
<b>London Underground</b>	14%	41%
<b>National Rail</b>	7%	16%
<b>London Overground</b>	7%	14%
<b>DLR</b>	4%	5%
<b>Tram</b>	1%	2%
<b>PHV</b>	11%	11%
<b>Taxi</b>	2%	2%
<b>Motorcycle</b>	1%	1%
<b>Pedal Cycle</b>	3%	13%

<sup>33</sup> LTDS 2022/23

According to previous research<sup>34</sup>, disabled Londoners are more likely than non-disabled Londoners to be worried about personal security (i.e. being safe from crime or antisocial behaviour) while using public transport in London.

Furthermore, disabled Londoners are more likely than non-disabled Londoners to have experienced a specific worrying incident in the past three months (38 per cent compared with 30 per cent).

### 7.9.3 Cross-River Travel in East/Southeast London

According to the Silvertown Tunnel Socio-Economic Monitoring Report (May 2024), respondents who have a disability were much less likely to travel for all purposes across the Thames.

**Table 29: Travelling for journey purposes across the River Thames in East/ Southeast London at least once a week – by disability<sup>35</sup>**

	All (n=1027)	Has a disability (n=107)	Does not have a disability (n=907)
<b>Travel to work (commuting)</b>	27%	5%	30%
<b>Travel for work (business)</b>	10%	3%	11%
<b>Travel to education</b>	4%	0%	4%
<b>Travel for shopping and personal business</b>	13%	11%	13%
<b>Leisure</b>	16%	10%	16%
<b>Other reasons</b>	3%	1%	4%
<b>One day a week or more for any purpose</b>	38%	13%	41%

### 7.9.4 Dial-a-Ride Users

London Dial-a-Ride is a free, door-to-door transport service provided by TfL for older and disabled Londoners who can't always use public transport.

Dial-a-Ride can be used for local trips, such as going to the shops, visiting family or friends, attending social activities and GP or dentist and some other medical appointments

<sup>34</sup> TfL (2019), [Travel in London: Understanding our diverse communities](#)

<sup>35</sup> TfL, Silvertown Tunnel socio-economic monitoring (May 2024); resident surveys; Q2 'How often do you travel across the River Thames in east/southeast London for [purpose]?', 2023 (base sizes as above)

where no other form of door-to door transport is available. It cannot be used for hospital appointments, local authority day centres and school transport.

To be eligible for Dial-a-Ride services, users must meet any of the following criteria:

- A Taxicard member
- Getting the Higher Rate Mobility Component of Disability Living Allowance
- Getting the Standard or Enhanced Mobility Rate of the Personal Independence Payment (PIP)
- Registered blind or partially sighted
- Aged 85 or over
- Getting a Higher Rate Attendance Allowance
- Getting a War Pension Mobility Supplement.

Table 30 summarises the number of residents in the host boroughs registered for Dial-a-Ride and the number of trips made in the period 28 May 2023 to 24 June 2023.

**Table 30: Dial-a-Ride Users and Trips in the Host Boroughs<sup>36</sup>**

Area	Registered members	Trips
Newham	1,540	2,090
Tower Hamlets	595	528
Greenwich	586	368

### 7.9.5 Blue Badge Holders

Table 31 highlights that the proportion of Blue Badge holders is similar within the host boroughs, sub-region and London-wide.

**Table 31: Proportion of Resident Population with Blue Badges<sup>37</sup>**

Area	Number of valid Blue Badges held on 31 March 2023	Badge holders as a percentage of the population
All London	273,000	3%
Sub-Region	107,000	3%
Greenwich	8,000	3%
Newham	9,000	3%
Tower Hamlets	8,000	3%

<sup>36</sup> TfL Data

<sup>37</sup> Department for Transport (2023), DIS0105 - Valid Blue Badges held and population measures by region and local authority in England

To be eligible for a Blue Badge, holders must:

- Receive the higher rate of the mobility component of the Disability Living Allowance (DLA)
- Receive a Personal Independence Payment (PIP) because they can't walk more than 50 metres (a score of 8 points or more under the 'moving around' activity of the mobility component)
- Be registered blind (severely sight impaired)
- Receive a War Pensioners' Mobility Supplement
- Have received a lump sum benefit within tariff levels 1 to 8 of the Armed Forces and Reserve Forces (Compensation) Scheme and have been certified as having a permanent and substantial disability that causes inability to walk or very considerable difficulty in walking.
- Receive the mobility component of PIP and have obtained 10 points specifically for descriptor E under the 'planning and following journeys' activity, on the grounds that they are unable to undertake any journey because it would cause them overwhelming psychological distress.

## 7.10 Homelessness

Table 32 sets out the approximate number of people seen rough sleeping in the three host boroughs in 2022/2023.

**Table 32: Number of people seen rough sleeping in Host Boroughs in 2022/2023<sup>38</sup>**

Area	Number of people seen rough sleeping in 2022/2023
Greenwich	196
Newham	503
Tower Hamlets	460

Table 33 sets out number of people who threatened with homelessness and owed prevention duties which include any activities aimed at preventing a household threatened with homelessness within 56 days from becoming homeless. This table also shows the number of people who are homeless and owed relief duties and require help to secure settled accommodation.

<sup>38</sup>[GLA \(2023\) CHAIN Annual Report – Greater London – April 2022 to March 2023](#)



However, it should be noted that this data may not fully represent the homeless population at any given time.

**Table 33: Number of people homeless and threatened with homelessness between July to Sept 2023<sup>39</sup>**

<b>Area</b>	<b>Threatened with homelessness – Prevention duty owed</b>	<b>Homeless – duty owed</b>
<b>Greenwich</b>	290	334
<b>Newham</b>	156	503
<b>Tower Hamlets</b>	277	382
<b>London</b>	<b>6,600</b>	<b>8,040</b>

## 7.11 Asylum Seekers & Refugees

Table 34 sets out the number of Asylum Seekers in the Sub-Region in receipt of support as of 31 March 2023. It should be noted that this does not account for Asylum Seekers who are awaiting approval of their application for support or are yet to be approved accommodation within a local authority through a resettlement programme.

**Table 34: Sum of Asylum Seekers in receipt of support, by borough<sup>40</sup>**

<b>Area</b>	<b>Number of People</b>
<b>Greenwich</b>	568
<b>Newham</b>	1,550
<b>Tower Hamlets</b>	449
<b>Sub-Region</b>	<b>9,074</b>

Table 35 sets out the number of refugees resettled from Q1 2019 to Q1 2023.

<sup>39</sup> Department for Levelling Up, Housing and Communities (2024), Statutory homelessness: Detailed local authority-level tables July-September 2023, Table A1 - Number of households by initial assessment of homelessness circumstances and needs

<sup>40</sup> Home Office (2023), Immigration System Statistics – Asylum and Resettlement – Asylum Seekers in receipt of support by Local Authority

**Table 35: Sum of Refugees Resettled from Q1 2019 to Q1 2023, by borough<sup>41</sup>**

<b>Area</b>	<b>Number of People</b>
<b>Greenwich</b>	56
<b>Newham</b>	6
<b>Tower Hamlets</b>	9
<b>Sub-Region</b>	<b>300</b>

## 7.12 Carers

Care workers predominantly fall under two categories: care home workers and domiciliary care workers. The former provide care within a set location, such as a care or nursing home. The latter provide care in the community and typically visit their clients in their own home. A domiciliary care worker would visit multiple clients in their own homes over a typical shift, in order to fulfil their care needs.

Similar to domiciliary care workers, personal assistants (PAs) provide care within a client's own home. However, rather than being employed by a care organisation, a PA would typically be employed by the person they are caring for (or by their guardian) to support the individual to live independently. This may include tasks such as organising activities and appointments, helping with travel, personal care, and household tasks. Some PAs may be employed by a senior PA, who manages multiple PAs.

Some care workers also work on a voluntary basis for charitable organisations, whilst others may undertake care responsibilities on an informal basis by providing care duties for a friend or family member.

Our definition of carers for the purposes of this assessment includes:

- Paid carers (domiciliary and residential)
- Informal carers (unpaid)
- Carers in the voluntary and community sectors (paid and unpaid)
- Personal Assistants (PAs)

Care workers are amongst the lowest paid workers in the UK. Nationally, care worker median pay was £11 (£11.31 in the London region) in December 2023 according to research by Skills for Care<sup>42</sup>. However, in 2024, this is considered to be around roughly £12 an hour<sup>43</sup>. This reflects changes in the National Living Wage to £11.44 in April 2024.

<sup>41</sup> Home Office (2023) Immigration System Statistics – Asylum and Resettlement – Resettlement by Local Authority

<sup>42</sup> [Skills for Care \(2023\), A summary of the adult social care sector and workforce in London 2022/23](#)

<sup>43</sup> [Nurses.co.uk \(30 July 2024\), What is the NHS minimum wage and which social care workers are paid it?](#)

According to the Government's National Career Service website, the average starter salary for a care worker is £19,000 a year and £25,000 for an experienced care worker<sup>44</sup>. Assuming a 40-hour work week, carers receiving the National Living Wage would be paid around £23,795 annually. This is similar to the entry point (Band 2) salary of a Health Care Assistant in the NHS<sup>45</sup>. However, it is important to acknowledge that many care workers in London are employed on zero-hour contracts. In 2023, around 39 per cent (73,000 filled posts) of the workforce in London were recorded as being employed on zero-hour contracts. Non-residential care services had the highest proportion of workers employed on zero-hour contracts at 62 per cent<sup>46</sup>. Therefore, for these care workers, salaries may be lower.

It is also understood that the care sector faces significant workforce challenges in retaining and recruiting staff. There is also reported to be a very high staff turnover in the sector. This is likely to be due to a combination of factors, with key concerns raised around the low pay and workload pressures experienced by staff in the sector.

A further challenge faced by many working in the domiciliary care sector is that the majority are not paid for time spent travelling between jobs. According to Unison, a survey of more than 300 domiciliary care workers across England in 2023 found that 75 per cent of care staff who look after people at home are not being paid for the time it takes them to travel between appointments.<sup>47</sup> However, a survey by Homecare Association found that 90 per cent of staff who worked for the organisations which responded use their own vehicle or public transport and expenses are paid – this of course comes at a cost to the organisation, many of whom have expressed concern about the rising costs of covering travel for care workers.<sup>48</sup>

Except for the regulated professions (such as social workers and registered nurses), the social care workforce in England is not subject to professional regulation. This is an area where England differs from the rest of the UK. In Scotland, care workers are required to register with the Scottish Social Services Council and must attain a specific qualification in line with their role within five years if they do not already possess one. In Wales, care workers must commit to complete a required qualification within three years if they do not already possess one. In Northern Ireland, registration is intended to demonstrate compliance with standards of conduct and practice rather than qualifications.<sup>49</sup>

Care Homes and Care Agencies that employ care workers are required to be registered with the Care Quality Commission (CQC). However, this is managed at the organisational level rather than care workers being directly regulated and/or holding a qualification at the individual level.

For charities that provide formal care services and employ care workers, many of these organisations are regulated by the CQC and as such would be included. However, as with NHS nurses, it is likely that nurses working for charities are less likely to be amongst the lowest paid.

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<sup>44</sup> [National Careers Service, Care Worker](#)

<sup>45</sup> [NHS Pay Scales for 2024/25](#)

<sup>46</sup> [Skills for Care \(2023\), A summary of the adult social care sector and workforce in London 2022/23](#)

<sup>47</sup> [Unison \(15 June 2023\), Majority of homecare staff are unpaid for travel between visits](#)

<sup>48</sup> [Homecare Association \(March 2022\) Fuel costs and homecare – impact on service capacity](#)

<sup>49</sup> [Adult social care workforce in England, House of Commons Research Briefing](#) (September 2022)

Voluntary care workers and informal carers would not be included as they are not employed by a CQC registered care provider. Not all PAs are required to be registered with the CQC, and this is dependent on a number of factors including whether 'personal care' is involved, whether they are directly employed by an individual, use an introduction agency or matching service to find the PA, employ a pool of PAs working together, whether the individual pools their budget with other individuals to employ a PA, or they engage a self-employed PA.<sup>50</sup> As a result, it may be harder for a care worker to provide proof of their role, unlike nurses or social workers (who would be able to provide evidence from a regulatory body).

According to Skills for Care, in 2022/23 the adult social care sector in the London region had an estimated 3,500 organisations with 5,800 care-providing locations. The total number of posts was 250,000 (a change of -2,600 from 2021/22). Of these posts, 226,000 were currently filled by a person, called 'filled posts' (0.0 per cent change since 2021/22) and 24,500 were vacant posts (vacancies) that employers were actively seeking to recruit somebody into (a change of -9.8 per cent since 2021/22).<sup>51</sup> Around 79 per cent of care workers in London are female and 65 per cent are from ethnic minority groups.<sup>52</sup>

A search of a sample of homecare providers inspected by the CQC in the host borough area found that some service providers were providing care in other London boroughs to the ones they were registered in, including clients in cross-river boroughs. The location a domiciliary care worker may travel to is not static and can change regularly. Homecare Association estimates that around 71 per cent of domiciliary care staff in Greater London use either their own vehicle or a company to carry out their duties.<sup>53</sup> The distance travelled by a PA is likely to vary dependent on the responsibilities required as part of their employment, which may include travelling with or on behalf of their client, and transporting a client to locations including work, education, social activities or health facilities.

## 7.13 Employment, Income and Deprivation

### 7.13.1 Employment Levels

The percentage of economically active people in employment (excluding full time students) is higher in the LSA compared to the Host-Boroughs, Sub-Region and London-wide.

In the southern LSA, economic inactivity is lower than in the area of the northern LSA, host boroughs, Sub-Region and the London-wide average.

In Newham, employment levels at 56 per cent, are marginally lower than in the other host boroughs, and the average across the Sub-Region and London. In Tower Hamlets and Greenwich, the percentage of people in employment is similar to the Sub-Region of 60 per cent.

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<sup>50</sup> [Skills for Care \(2017\), Understanding the employment status of personal assistants \(PAs\) – A guide for individual employers](#)

<sup>51</sup> [Skills for Care \(2023\), A summary of the adult social care sector and workforce in London 2022/23](#)

<sup>52</sup> [Skills for Care \(2023\), A summary of the adult social care sector and workforce in London 2022/23](#)

<sup>53</sup> [Homecare Association \(2022\), High fuel costs – the ongoing impact on homecare](#)

**Table 36: Economic Activity of Resident Population<sup>54</sup>**

<b>Area</b>	<b>Economically active (excluding full-time students): In employment</b>	<b>Economically active (excluding full-time students): Unemployed</b>	<b>Economically active and a full-time student</b>	<b>Economically inactive</b>
Greenwich	60%	5%	3%	32%
Newham	56%	5%	4%	35%
Tower Hamlets	59%	5%	4%	33%
<b>Sub-Region</b>	59%	4%	3%	33%
<b>Local Study Area (North)</b>	62%	5%	4%	29%
<b>Local Study Area (South)</b>	69%	4%	4%	23%
<b>London</b>	59%	4%	3%	34%

### 7.13.2 Employment by Occupation

Table 37 shows the percentage of working age population in employment by occupation.

The percentage of residents employed as ‘managers, directors and senior official’ is higher in the southern LSA. In the northern LSA, and within Tower Hamlets, a higher proportion of residents are in ‘professional occupations’.

16 per cent of residents in Newham are employed in ‘elementary occupations’, a greater proportion than in the other areas. A higher proportion of residents are also in lower skilled occupations categories of ‘process, plant and machine operatives’ and ‘sales and customer service occupations’.

<sup>54</sup> ONS Census (2021), TS066 - Economic activity status

**Table 37: Resident Population by Occupation<sup>55</sup>**

<b>Area</b>	<b>Local Study Area (North)</b>	<b>Local Study Area (South)</b>	<b>Greenwich</b>	<b>Newham</b>	<b>Tower Hamlets</b>	<b>Sub-Region</b>	<b>London</b>
<b>1. Managers, directors and senior officials</b>	13%	17%	13%	9%	13%	13%	15%
<b>2. Professional occupations</b>	29%	35%	25%	20%	32%	25%	26%
<b>3. Associate professional and technical occupations</b>	16%	18%	15%	12%	18%	15%	15%
<b>4. Administrative and secretarial occupations</b>	7%	7%	8%	8%	7%	9%	8%
<b>5. Skilled trades occupations</b>	6%	4%	8%	10%	5%	8%	8%
<b>6. Caring, leisure and other service occupations</b>	7%	6%	9%	9%	6%	8%	8%
<b>7. Sales and customer service occupations</b>	6%	5%	6%	9%	7%	7%	6%
<b>8. Process, plant and machine operatives</b>	5%	2%	5%	7%	4%	5%	5%
<b>9. Elementary occupations</b>	10%	6%	11%	16%	8%	10%	9%

<sup>55</sup> ONS Census (2021), TS063 - Occupation

### 7.13.3 Universal Credit Support Recipients

Table 38 shows the approximate percentage of the population of the Sub-Region boroughs who are in receipt of Universal Credit. Universal Credit is a form of income support provided by Government for people who are on low incomes, out of work or who cannot work.

This data provides an insight into the potential number of people within each borough who may be on low incomes. However, it is not fully representative of the low-income population.

**Table 38: Resident Population in Receipt of Universal Credit<sup>56</sup>**

<b>Area</b>	<b>Approx. Percentage of population in receipt of Universal Credit</b>
Greenwich	10%
Newham	13%
Tower Hamlets	13%
<b>Sub-region</b>	11%
<b>London</b>	12%

### 7.13.4 Social Grades

Table 39 shows the percentage of residents in the host boroughs, Sub-Region and London by Social Grade.

Social Grade is a socio-economic classification. This is a way of grouping people by type, which is mainly based on their social and financial situation.

Social Grade has six possible classifications (A, B, C1, C2, D and E). Census data uses a combined, four-way classification:

- AB: Higher and intermediate managerial, administrative and professional occupations
- C1: Supervisory, clerical, and junior managerial, administrative and professional occupations
- C2: Skilled manual occupations
- DE: Semi-skilled and unskilled manual occupations; unemployed and lowest grade occupations

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<sup>56</sup> DWP (2024), People on Universal Credit

**Table 39: Resident Population by Approximated Social Grade<sup>57</sup>**

Area	AB	C1	C2	DE
Greenwich	26%	30%	19%	24%
Newham	17%	28%	23%	32%
Tower Hamlets	28%	28%	14%	30%
<b>Sub-Region</b>	26%	31%	19%	24%
<b>London</b>	28%	31%	18%	23%

### 7.13.5 Deprivation

The Income Deprivation Domain measures the proportion of the population in an area experiencing deprivation due to low income. The definition of low income includes both those people that are out-of-work, and those that are in work but who have low earnings (and who satisfy the respective means tests).

As shown in Table 40, of the three host boroughs, Tower Hamlets has the greatest proportion of population in the 10 per cent most income deprived LSOAs nationally. This is the second highest within the sub-region.

In contrast, Tower Hamlets also has the highest proportion of LSOAs in the 10 per cent least income deprived of the three host boroughs.

96 per cent of LSOAs in Newham are in the 50 per cent most income deprived deciles, compared to 87 per cent of LSOAs in Tower Hamlets and 77 per cent in Greenwich.

**Table 40: Income Deprivation<sup>58</sup>**

Area	Income Decile (where 1 is most deprived 10% of LSOAs)									
	1	2	3	4	5	6	7	8	9	10
Greenwich	6%	21%	19%	19%	12%	9%	4%	6%	2%	2%
Newham	4%	19%	38%	23%	12%	1%	0%	1%	1%	2%
Tower Hamlets	15%	36%	16%	10%	9%	4%	2%	4%	2%	2%
<b>Host Boroughs</b>	<b>8%</b>	<b>25%</b>	<b>25%</b>	<b>18%</b>	<b>11%</b>	<b>5%</b>	<b>2%</b>	<b>3%</b>	<b>2%</b>	<b>2%</b>

<sup>57</sup> ONS Census (2021), Approximated social grade

<sup>58</sup> Indices of Deprivation (2019), Local income deprivation data



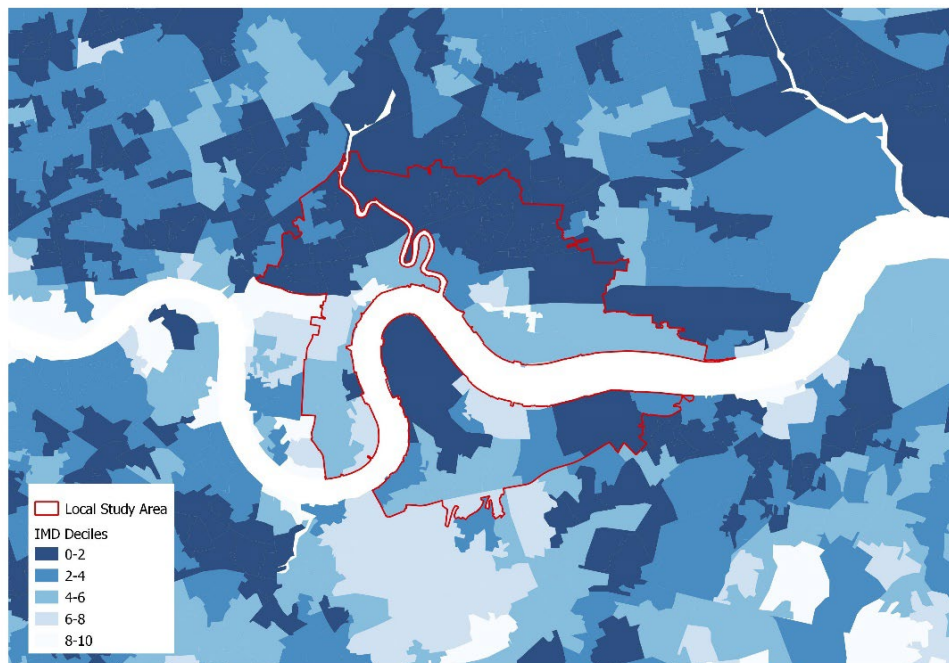
<b>Sub-Region</b>	<b>7%</b>	<b>18%</b>	<b>19%</b>	<b>16%</b>	<b>12%</b>	<b>7%</b>	<b>5%</b>	<b>5%</b>	<b>5%</b>	<b>5%</b>
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When considering the indices of multiple deprivation, 32 per cent of LSOAs in Tower Hamlets are in the 20 per cent most deprived nationally. This is higher than Newham (27 per cent) and Greenwich (22 per cent). As seen in Table 41 some of the LSOAs in the host boroughs are within the most deprived nationally.

**Table 41: IMD – Proportion of LSOAs in most deprived 10% nationally<sup>59</sup>**

<b>Area</b>	<b>IMD – Proportion of LSOAs in most deprived 10% nationally</b>
Greenwich	1%
Newham	2%
Tower Hamlets	1%
<b>Sub-Region Average</b>	<b>2%</b>

**Figure 6: Indices of multiple deprivation**



<sup>59</sup> Indices of Deprivation (2019), Local authority district summaries (lower-tier)

Figure 6 shows the indices of multiple deprivation in the local area, with '1' being the LSOAs within the 10 per cent most deprived and '10' being the 10 per cent least deprived LSOAs in England.

The Scheme is located in an area with high levels of deprivation and racial diversity. Data has shown that people from ethnic minorities are more likely than White British people to live in the most overall deprived 10 per cent of neighbourhoods in England.<sup>60</sup>

### 7.13.6 Travel Mode by Income

As shown in Table 42 Londoners on lower incomes (below £20,000) are more likely to travel by bus than people on higher incomes, at 67 per cent compared to 55 per cent of people on salaries above £20,000.

Londoners on lower incomes are less likely to drive, with 16 per cent driving at least once per week compared to 36 per cent with higher incomes. People on low incomes are also less likely to travel by active modes (walking and cycling).

**Table 42: Proportion of Londoners using modes of travel at least once per week, by income<sup>61</sup>**

Mode	Less than £20,000	£20,000+
Bus	67%	55%
Walking	90%	95%
Car (Driver)	21%	36%
Car (Passenger)	29%	40%
London Underground	33%	41%
National Rail	10%	15%
London Overground	12%	15%
DLR	7%	5%
Tram	2%	2%
PHV	11%	11%

<sup>60</sup> [Department for Levelling Up, Housing and Communities \(2020\), People living in deprived neighbourhoods](#)

<sup>61</sup> LTDS 2022/23

<b>Taxi</b>	2%	2%
<b>Motorcycle</b>	0%	1%
<b>Pedal Cycle</b>	7%	13%

### 7.13.7 Cross-River Travel in East/Southeast London

According to the Silvertown Tunnel Socio-Economic Monitoring Report (May 2024), ABC1<sup>62</sup> respondents were significantly more likely than residents from lower social grades to cross the river at least once a week for any purpose (48 per cent vs 23 per cent C2DE<sup>63</sup>). Across all purposes except travel for education or 'other' trips, ABC1 respondents were more likely to make cross-river trips than C2DEs.

Overall, car usage (as a driver or passenger) was much higher among C2DE respondents, while public transport use was higher for ABC1 respondents.

For commuting, Underground/ DLR and car (as a driver) were the most popular modes among both ABC1 (38 per cent and 28 per cent and C2DE residents (52 per cent and 38 per cent) but only ABC1 commuters were likely to use National Rail or Bus services (18 per cent and 10 per cent respectively vs. two per cent for each among C2DE commuters).

Cycling had a larger share of ABC1s whereas walking was more popular among C2DEs.

**Table 43: Travelling for journey purposes across the River Thames in East/ Southeast London at least once a week – by social grade<sup>64</sup>**

	<b>All (n=1027)</b>	<b>ABC1 (n=603)</b>	<b>C2DE (n=423)</b>
<b>Travel to work (commuting)</b>	27%	39%	10%
<b>Travel for work (business)</b>	10%	13%	6%
<b>Travel to education</b>	4%	2%	7%
<b>Travel for shopping and personal business</b>	13%	13%	12%
<b>Leisure</b>	16%	18%	13%
<b>Other reasons</b>	3%	3%	4%

<sup>62</sup> ABC1: Crafts/tradesperson/skilled worker, Office/clerical/administration, Middle management, Senior management, Professional

<sup>63</sup> C2DE: Homemaker/housewife/househusband, Student/Full time education, Retired, Unemployed/on benefit, Factory/manual worker

<sup>64</sup> TfL, Silvertown Tunnel socio-economic monitoring (May 2024); resident surveys; Q2 'How often do you travel across the River Thames in east/southeast London for [purpose]?', 2023

<b>One day a week or more for any purpose</b>	38%	48%	23%
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### 7.13.8 Car Ownership by Low-Income Residents

LTDS data, as shown in

Table 44, highlights that car ownership for lower income residents is lower when compared to the average for all income groups.

Car ownership is lowest in Newham and Tower Hamlets for lower income residents, at 12 per cent and 14 per cent respectively. In contrast, around 24 per cent of residents in Newham irrespective of income own a car, and 19 per cent of Tower Hamlets residents.

Car ownership in lower income households is greater in Greenwich, at 28 per cent. This is higher than the average across the Sub-region and London-wide for lower income residents of 25 per cent and 27 per cent respectively.

**Table 44: Proportion of Resident Population who have access to a personal car, by income<sup>65</sup>**

<b>Area</b>	<b>Income Below £25,000</b>	<b>All Incomes</b>
Newham	12%	24%
Tower Hamlets	14%	19%
Greenwich	28%	36%
<b>Sub-Region</b>	25%	34%
<b>London</b>	27%	36%

<sup>65</sup> LTDS 2022/23

## 8 Equality Impact Assessment

The following section assesses the potential equality impacts of the proposed user charges on protected characteristic and disadvantaged groups in London. This assessment has looked at the potential impacts in relation to the following topics:

- Accessibility (including access to community facilities)
- Access to work and training
- Active Travel
- Noise
- Air Quality
- Road Safety
- Social Capital

Table 1 provides a summary of the impacts topics which have been assessed with regards to their potential impact on protected characteristic and disadvantaged groups and summarises the disproportionate or differential impacts identified. The assessment draws on the data set out in the baseline in Section 7 of this document.

### 8.1 Accessibility (Including Access to Community Facilities)

#### 8.1.1 Introduction

Accessibility is a key influence on how people live, affecting how they socialise, spend recreation time, access services and work; this has a direct link to health and wellbeing.

The Silvertown Tunnel provides a new link across the Thames improving connectivity north and south of the River Thames in east London and giving access to a significantly wider catchment of services and facilities including education, retail, leisure, healthcare, places of worship and open space. The location of the northern portal of Silvertown Tunnel also provides direct access to the Royal Docks for people travelling from south of the river.

The Scheme will result in improved reliability and reduced journey times of existing bus routes as well as the provision of additional cross-river routes. The availability, efficiency and affordability of transport modes is important, and the proposed user charges have the potential to influence this.

The Scheme, which includes proposed user charges, is forecast to result in a large reduction in delay and congestion on the tunnel approaches making vehicle journey times through the tunnel quicker and more reliable in both directions at peak times. Model forecasts indicate that northbound vehicle journey time through the Blackwall Tunnel is forecast to reduce by around 15 minutes in the morning peak and nine minutes in the evening peak in the opening year (2025). Southbound vehicle journey time in the evening peak is forecast to reduce by up to 14 minutes (journey time benefits in the morning peak southbound are less significant due to lower levels of traffic in that direction, at that time). However, the savings will often be greater (up to 20 minutes, and sometimes more) when considering the knock-on effects of frequent closures and incidents at the Blackwall Tunnel which the scheme will significantly reduce – something that is not reflected in the transport models. This large reduction in delay and congestion would make vehicle journey times

through the tunnel more reliable in both directions at peak times. The new tunnel will also reduce the impact of incidents and closures at the Blackwall Tunnel by providing an additional vehicle route across the Thames.

Furthermore, the Scheme will also provide two new cross-river bus routes (129 & SL4) through the Silvertown Tunnel and provide improved reliability and quicker journey times for the existing route 108 via the Blackwall Tunnel. In the opening year, these improvements are forecast to save 9,800 vehicle-hours per day and 2,800 public transport passenger-hours per day (07:00-19:00).

The user charges are an essential component of the Scheme to remove queueing and congestion at the crossings, enabling reliable bus journeys and thereby opening up access to a wider range of facilities across the river.

### 8.1.2 Summary

Table 45 summarises the overall equality impact of the proposed user charges on Accessibility. Sections 8.1.3–8.1.11 provide further detail on the factors which have been considered as part of this assessment and the conclusions reached.

**Table 45: Accessibility Summary**

<b>Summary</b>	<p>The 100 per cent discount for Blue Badge Holders and exemption for disabled tax class vehicles helps to ensure that accessibility is not impacted for eligible disabled people who may be reliant on car use for cross-river travel. These could also potentially benefit some older people.</p> <p>Similarly, the exemptions for taxis and ZEC and/or wheelchair accessible PHVs help to advance equality of opportunity by ensuring that these vehicles are available to disabled people and the proposed user charges will not negatively impact fares. Thus, helping to eliminate unlawful discrimination, advance equality of opportunity, and foster good relations by enabling disabled people who may be reliant on car, taxis, wheelchair accessible PHVs to benefit from improved accessibility.</p> <p>The 100 per cent discount for community transport (Vehicles with 9+ seats) mitigates potential impacts of reduced or cut services provided by community or charitable organisations due to the proposed user charges. This could have a greater positive impact on young children, older people, disabled people, religious groups, homeless people, asylum seekers, refugees, and people on low incomes reliant on this form of transport. Furthermore, the scheme will lead to improved access to a greater range of community facilities due to faster and more reliable journey times. This discount helps to eliminate unlawful discrimination, advance equality of opportunity, and foster good relations.</p> <p>The NHS Patient reimbursement helps to ensure that access to health facilities is not negatively impacted for those unable to travel by public</p>
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transport (subject to eligibility). This could benefit older people, disabled people and pregnant and maternal people to a greater extent than other groups. This helps to eliminate unlawful discrimination and advance equality of opportunity to access healthcare.

The east London low-income residents' discount will help mitigate potential negative impacts on accessibility for people on low incomes who may need to travel by private vehicle. This discount may also benefit people who fall into other protected characteristic and disadvantaged groups who are more likely to be on low incomes, such as older people, Black, Asian and minority ethnic people, and disabled people. Thus, helping to eliminate unlawful discrimination, advance equality of opportunity and foster good relations by ensuring people on low incomes are able to benefit from improved accessibility by private vehicle.

Negative impacts associated with the proposed user charges on accessibility for those not eligible for discounts and exemptions are considered to be offset by faster and more reliable journey times leading to improved accessibility and access to a greater range of community facilities. Furthermore, the provision of new and improved cross-river bus services, with improved journey times and service reliability is considered to provide a viable alternative mode of travel cross-river. As part of the green and fair package of concessions and discounts there will be bus concessions to provide free pay as you go trips to support local residents to use the new cross-river bus services which will run through the tunnel (Route 108, 129 and SL4) and DLR concessions to provide free pay as you go trips (refunded) to support local residents making journeys from King George V - Woolwich Arsenal and Island Gardens - Cutty Sark. The improvements to cross-river accessibility by public transport and other vehicles are considered to help advance equality of opportunity and foster good relations by improving accessibility (including to access to community facilities) cross-river.

There is a risk that the user charge could have a negative impact on carers and the provision of care cross-river by informal, voluntary and paid care workers and PAs. If negative impacts were to arise, this could lead to negative impacts on accessibility for disabled people and older people. Whilst we believe that our proposed support options help to mitigate these potential impacts from occurring, it is important that we monitor whether any negative impacts arise and explore options to mitigate these in line with Policy 15 of the CPAP, and that we provide targeted communications to raise awareness of the discounts and exemptions that care providers or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan.

<b>Overall rating of impact</b>	Neutral
<b>Overall Impacts identified for protected characteristic and disadvantaged groups</b>	N/A
<b>Mitigations required</b>	N/A

### 8.1.3 Age

#### 8.1.3.1 Young People

As shown in the baseline (Section 7.3.2), young people under the age of 16 in London are more likely to be a car passenger at least once per week than any other age group, at 67 per cent, and around 56 per cent use the bus at least once per week.

Young people aged 16-24 use the bus significantly more than any other age group, with 72 per cent travelling by this mode at least once per week.

Young people reliant on car passenger trips cross-river who live in low-income households eligible for the east London low-income residents' discount will benefit from the discount. This could mitigate negative changes in accessibility resultant from the financial impact of the proposed user charges.

The proposed user charges may present a financial barrier for some young people in households that do not meet eligibility for this discount, which may lead to changes in cross-river travel.

However, the improvements to cross-river public transport provision through the introduction of new bus services through the Silvertown Tunnel and improvements to existing journey times will help to mitigate potential negative impacts on making cross-river journeys for young people, with a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

Young people are also eligible for a number of concessions on public transport use. Including the Zip Oyster card (for people aged 11-17) allowing free travel on buses and discounts on other public transport services. Furthermore, children aged 5-10 with a 5-10 Zip Oyster card travel for free on all TfL services, and children younger than five years of age travel for free with a fare paying adult.

Additionally, for those not eligible for the aforementioned concessions, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people



switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys, and free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V.

The community transport (Vehicles with 9+ seats) 100 per cent discount ensures that school age children reliant on community and charitable transport to access cross-river social, educational, and recreational facilities are not negatively impacted due to reduced or cut services resultant of the proposed user charges.

This discount, in addition to improved journey times and reliability could have a positive impact on accessibility for young people reliant on these services. This would be particularly beneficial to young people with Education Health and Care Plans (EHCPs), with around 40 per cent using this type of travel.<sup>66</sup>

The proposed user charges for PHVs which are not ZEC or wheelchair accessible could lead a small reduction in the availability of PHVs for cross river trips. This could have a small impact on access to Special Educational Needs and Disability (SEND) schools for young people with an EHCP who may use a PHV to travel to school.

However, the impact on availability is predicted to be limited, as only a small number of PHVs meet the standards for SEND transport, with taxis (which are exempt) being the more commonly used mode behind minibuses.<sup>67</sup>

### **8.1.3.2 Older People**

People aged 65 and over travel by all modes less frequently than other people aged 16 and above. Around 43 per cent travel by car as a driver at least once per week (34 per cent as a passenger), and around 52 per cent travel by bus at least once per week.

As shown in the baseline (Section 7.3.3), 22 per cent of people aged 65 and over cross the Thames in east and southeast London at least once per week, with 'leisure' and 'shopping and personal business' being the primary reasons for crossing the river.

The community transport (Vehicles with 9+ seats) 100 per cent discount helps to ensure that older people who may be reliant on community and charitable transport which may require cross-river travel are not negatively impacted due to user charges. This discount, alongside the improved journey times and reliability is likely to have a positive impact on people older people reliant on services such as Dial-a-Ride.

Older people who are eligible for a Blue Badge will benefit from the 100 per cent discount for Blue Badge Holders. This discount will help ensure that older people who may need to travel by car do not experience reduced accessibility resulting from the financial implications of the proposed user charges. The improvements in journey times and reliability could have a positive impact on accessibility for older people who are Blue Badge holders.

Older people with a disabled tax class vehicle will benefit from the exemption for vehicles with a disabled tax class. This will help ensure that older people who may need to travel by car do not experience reduced accessibility resultant of the financial implications of the

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<sup>66</sup> [London Councils \(March 2020\), SEN Transport in London: Current and emerging practice](#)

<sup>67</sup> [London Councils \(March 2020\), SEN Transport in London: Current and emerging practice](#)

proposed user charges. This exemption, alongside the improvements in journey times and reliability could have a positive impact on accessibility.

Some older people may be reliant on a domiciliary, voluntary, or informal care worker or PA to help them with cross-river travel by private vehicle. As set out further in Section 8.2.6, there is a risk that the proposed user charges could lead to a negative impact on the provision of care cross-river. If this were to occur, it could lead to negative impacts on accessibility for older people in receipt of care.

When travelling with a person in receipt of care who has a Blue Badge, care workers can potentially apply their vehicle to the Blue Badge holder's Road User Charging account prior to travel in order to receive a 100 per cent discount on the user charges. A maximum of two vehicles can be registered to an account. If the carer or PA is the nominated driver for a person eligible for a vehicle to be registered in the Disabled Tax Class, they are able to receive an exemption. Furthermore, if transporting an older person to an eligible NHS appointment, they may be able to claim a reimbursement of the user charges.

Some carers and PAs may be eligible for a 50 per cent discount on the user charges through the east London low-income residents' discount. Furthermore, we are providing a £1 discount on the off-peak user charges for eligible sole traders, charities, and small businesses registered in the host boroughs and free pay as you go (refunded) bus and certain pay as you go DLR river crossings for at least one year following tunnel opening, a 100 per cent discount for community transport (Vehicles with 9+ seats) and a 100 per cent discount for certain operational vehicles of the host boroughs.

The improvements in journey times and reliability may also mean that cross-river travel via the tunnels becomes a more viable option for carers, helping to improve in accessibility for older people reliant on them for cross-river travel. As such, whilst we believe that our proposed discounts and exemptions alongside the improvements to journey times and reliability will help to mitigate negative impacts on the provision of care whilst ensuring we achieve our project objectives, it is important that we monitor how the scheme is affecting cross-river care provision and ensure we seek to address any impacts should they have a negative impact on protected characteristic and disadvantaged groups. In line with Policy 15 of the CPAP, we will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening.

Additionally, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended that we provide targeted communications to carers to raise awareness of the discounts and exemptions they or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan.

Some older people who are not eligible for the aforementioned discounts and exemptions may be impacted by the proposed user charges. This may lead to changes in frequency and mode of travel, and impact accessibility. However, older people in low-income households may be eligible for the east London low-income residents' discount, helping to offset the financial impact. Furthermore, they will benefit from improvements to journey times and reliability when using the tunnels.

Older people in London are eligible for travel concessions, including the 60+ Oyster Card and Freedom Pass. As shown in the baseline (Section 7.3.2), the bus is the most used

mode of transport for older people in London. Therefore, the improvements to bus service provision through the tunnels through new and improved routes will help to provide a suitable alternative mode of travel for older people who switch modes due to the proposed user charges. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4. All TfL buses are wheelchair accessible, and travel by wheelchair or mobility scooter is free on buses.

Additionally, for those not eligible for the aforementioned concessions, as part of the green and fair package of concessions and discounts, concessions will be offered on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys, and free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V as well as a cross-river cycle shuttle-bus, free for at least 12 months. All TfL buses are wheelchair accessible and all DLR stations are step-free.

A Road User Charging account is required to sign up to Auto Pay or to receive certain discounts such as the low-income resident's discount and 100 per cent discount for Blue Badge holders. It is recognised that older people are significantly more likely than other age groups to be at risk of digital exclusion due to a lack of access to the internet, with 73 per cent using the internet at home compared to 96 to 99 per cent of other people aged 16 and over.<sup>68</sup>

Due to this, some older people may face barriers to accessing discounts and exemptions they may be eligible for and may not be able to benefit from off-peak charges. To overcome this, in our road user charging systems we comply with reasonable adjustment provisions to ensure that we offer a suitable level of service to all customers, these provisions we have for reasonable adjustments can also cater for people that are not online. Customers are able to contact our call centre to carry out functions such as setting up a discount and setting up Auto Pay and are able to send in supporting evidence via post. Customers can also pay the tunnel charges via the automated telephony system without having to go online or download the app. This helps to ensure that people who may be digitally excluded, such as older people, are not negatively impacted by a lack of access to the system.

#### **8.1.4 Disability**

As shown in the baseline (Section 7.9.2), disabled Londoners are less likely to travel by all modes compared to non-disabled Londoners. However, behind walking, bus and car journeys (as a passenger) are the most common modes – at 44 per cent and 35 per cent respectively. Furthermore, disabled Londoners are less likely to cross the Thames for any purpose than non-disabled Londoners.

The baseline data in Section 6.9.2 also shows that around one quarter of disabled Londoners travel by car as a driver at least once per week. Some disabled Londoners may travel by this mode due to barriers or challenges using public transport (including safety and harassment concerns). Disabled people who prefer or need to drive may be negatively impacted by the proposed user charges. However, they will benefit from the improvements to journey times and journey reliability from the Scheme. To mitigate negative impacts on

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<sup>68</sup> [Ofcom \(2022\), Digital Exclusion Review](#)

accessibility for disabled people resultant of the user charges, we have proposed several discounts, exemptions, reimbursements and travel concessions.

Disabled people who are Blue Badge Holders will benefit from a 100 per cent discount for Blue Badge Holders. Furthermore, disabled people with a disabled tax class vehicle will benefit from the exemption for vehicles with a disabled tax class. These discounts and exemptions help to ensure that disabled people who may need to travel by car do not experience reduced accessibility resultant of the financial implications of the proposed user charges.

Some disabled people will also be eligible for the east London low-income residents' discount, helping to mitigate the impact of the proposed user charges on disabled people. Previous research has shown that around 61 per cent of disabled Londoners are on low incomes.<sup>69</sup>

A Road User Charging account is required to sign up to Auto Pay or to receive certain discounts such as the 50 per cent discount for low-income resident's discount in east London, and 100 per cent discount for Blue Badge holders. It is recognised that some disabled people may not be able to fully access our online systems.

Due to this, some may face barriers to accessing discounts and exemptions that they may be eligible for and may not be able to benefit from off-peak charges. To overcome this, in our road user charging systems we comply with reasonable adjustment provisions to ensure that we offer a suitable level of service to all customers, these provisions we have for reasonable adjustments can also cater for people that are not online. Customers can contact our call centre to carry out functions such as setting up a discount and setting up Auto Pay and are able to send in supporting evidence via post. Customers can also pay the tunnel charges via the automated telephony system without having to go online or download the app. This helps to ensure that people who may be digitally excluded, such as disabled people, are not negatively impacted by a lack of access to the system.

For those who choose to switch modes due to the financial cost of the proposed user charges, we offer a free Travel Mentoring Scheme to help people using public transport in and around London to become confident and independent travellers. Travel mentors can give advice by telephone and email to help plan an accessible route, provide a mentor to accompany people on their first few practice journeys to help them learn how to travel the network independently, and assist virtually using apps available on most smartphones.

New and improved routes will help to provide a suitable alternative mode of travel for disabled people who currently travel by bus (44 per cent) and for those switch modes due to the proposed user charges. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4. All TfL buses are wheelchair accessible and travel by wheelchair or mobility scooter is free on buses. Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This will help support disabled people not eligible for or not in receipt of our existing public transport travel concessions for disabled people. This includes free pay as you go cross-river bus journeys and free pay as you go DLR journeys (refunded)

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<sup>69</sup> [TfL \(2019\), Travel in London: Understanding our diverse communities](#)

between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents. The entire DLR network is step-free.

Disabled people who use taxis and PHVs for cross-river travel will benefit from the exemption from the proposed user charges for taxis (all of which are wheelchair accessible and have other accessibility features) and wheelchair accessible PHVs. This will help ensure that there is not a reduction in the number of available taxis, and that the availability and cost of using wheelchair accessible PHVs do not impact accessibility for disabled people. The exemption for wheelchair accessible PHVs and taxis is likely to have a disproportionate positive impact on disabled people.

PHVs which are neither wheelchair accessible nor ZEC will pay the proposed user charges. Approximately one per cent of the PHV fleet is wheelchair accessible. Therefore, disabled people using PHVs for travel regularly may be more likely to use a non-wheelchair accessible PHV. LTDS data shows that disabled people in the host boroughs use PHVs more regularly than non-disabled people, however the usage is similar pan-London.

A small number of PHV drivers may refuse cross-river bookings due to the proposed user charges. However, the reductions in congestion and journey times may conversely mean that PHV drivers are more inclined to accept bookings requiring travel via the tunnels.

The price will likely be absorbed into fare prices or incorporated into the pricing structure, meaning potentially increased fares. However, the improved journey times and reliability will help to offset this potential increase in cost. Some disabled people using PHVs may also be eligible for subsidised travel by PHV through the Taxicard<sup>70</sup> scheme.

Furthermore, alongside other policies such as age limits on PHVs, from 2023 all PHVs licensed for the first time must be ZEC and it is expected that all PHVs will be ZEC by 2033, meaning the impact will diminish over time as vehicle fleets are upgraded. 58 per cent of PHV fleet is now fully electric or ZEC (January 2024), an increase of 11 per cent since October 2023.

The community transport (Vehicles with 9+ seats) 100 per cent discount helps ensure disabled people reliant on community and charitable transport for cross-river travel are not negatively impacted due to reduced or cut services resulting from the proposed user charges. This discount, alongside the improved journey times and reliability is likely to have a positive impact on disabled people reliant on services such as Dial-a-Ride.

Some disabled people may be reliant on a domiciliary, voluntary, or informal carer or PA to help them with cross-river travel by private vehicle. As set out further in Section 8.2.6, there is a risk that the proposed user charges could lead to a negative impact on the provision of care cross-river. If this were to occur, it could lead to negative impacts on accessibility for disabled people.

When travelling with a person in receipt of care who has a Blue Badge, carers can apply their vehicle to the badge holder's Road User Charging account prior to travel in order to receive a 100 per cent discount on the user charges. A maximum of two vehicles can be registered to an account. If the carer or PA is the nominated driver for a person eligible for

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<sup>70</sup> The Taxicard scheme provides subsidised taxi and minicab travel in London for certain people with mobility impairments and who have trouble using public transport (subject to eligibility).

a vehicle to be registered in the Disabled Tax Class, they are able to receive an exemption. Furthermore, if transporting a disabled person to an eligible NHS appointment, they may be able to claim a reimbursement of the user charges.

Some carers and PAs may be eligible for a 50 per cent discount on the user charges through the east London low-income residents' discount. Furthermore, we are providing a £1 discount on the off-peak user charges for eligible sole traders, charities, and small businesses registered in the host boroughs and free pay as you go bus and certain DLR river crossings for local residents, for at least one year following tunnel opening, and a 100 per cent discount for community transport (Vehicles with 9+ seats) and a 100 per cent discount for certain operational vehicles of the host boroughs such as meals on wheels.

The improvements in journey times and reliability may also mean that cross-river travel via the tunnels becomes a more viable option for carers, and help to provide an improvement in accessibility for older people reliant on them for cross-river travel. As such, whilst we believe that our proposed discounts and exemptions will help to mitigate negative impacts on the provision of care whilst ensuring we achieve our project objectives, it is important that we monitor how the scheme is affecting cross-river care provision and ensure we seek to address these impacts should they have a negative impact on protected characteristic and disadvantaged groups. In line with Policy 15 of the CPAP, we will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening.

Additionally, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended that we provide targeted communications to carers to raise awareness of the discounts and exemptions they or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan.

### **8.1.5 Religion or Belief**

The baseline data in Section 7.6.1 shows that the LSA is religiously diverse, with 38 per cent identifying their religion as Christian, four per cent Hindu and eight per cent Muslim in south of the river and 34 per cent, four per cent and 29 per cent respectively north of the river.

The proposed user charges may present a financial barrier and impact access to cross-river religious centres or activities for some people in low-income households. This may mean that some who do not meet eligibility for the proposed discounts and exemptions may need to change how they access cross-river religious centres or activities.

However, people of different religions and beliefs in low-income households in the boroughs eligible for the east London low-income residents' discount reliant on car trips cross-river will benefit from the discount. This could mitigate negative changes in accessibility resultant from financial impact of the proposed user charges in addition to the improvements in journey times and reliability.

Furthermore, the improvements to the public transport cross-river through the introduction of two new bus services through the Silvertown Tunnel and improvements to journey times on existing services due to the new tunnel and user charges will help to mitigate potential negative impacts on ability to travel through the tunnels. With a total of 21 zero-emission

buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys and free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George to support local residents and a cross-river cycle shuttle-bus, free for at least 12 months.

Religious groups may use community transport vehicles to access religious or community events and services. The 100 per cent discount for community transport (Vehicles with 9+ seats) helps to ensure that people reliant on community transport to access community religious and social events and community facilities cross-river are not negatively impacted due to reduced or cut services resultant of the proposed user charges. This discount may therefore have a positive impact on people using this mode of travel.

### **8.1.6 Race**

The Scheme will provide a new cross river link and improved bus connections to services and facilities both sides of the river. The baseline (Section 7.7.1) identified that of the population in the LSA north of the river 39 per cent identified as White, 35 per cent identified as Asian and 16 per cent identified as Black, with 58 per cent, 15 per cent and 16 per cent respectively south of the river. As recognised in 7.13.5, the Scheme is in an area of high deprivation and people from ethnic minorities are more likely to live in the most deprived neighbourhoods in England.

Analysis of the responses to the consultation found that when the Silvertown Tunnel opens, Black, Asian and Other Ethnic Group respondents have a greater intention to use the Silvertown Tunnel at least once a week or more (31 per cent) than White respondents (17 per cent). It also found that Black, Asian and other Ethnic groups were more likely to use the bus (20 per cent) compared to White respondents (13 per cent), and Black, Asian and Other Ethnic Group respondents were more likely to use the Tunnel 2-3 times a week or more (38 per cent) than White respondents (24 per cent). LTDS data shows that Black Londoners are more likely to use the bus (69 per cent use this mode at least once per week) and less likely to travel by car or rail than other Londoners.

New and improved bus routes will help to provide a suitable alternative mode of travel for people who switch modes due to the proposed user charges, or regularly travel by bus. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys and free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents and a cross-river cycle shuttle-bus, free for at least 12 months.

The proposed user charges may have a negative financial impact on a small number of Black, Asian and minority ethnic people who use a personal vehicle to regularly travel cross-river due to fear of harassment on public transport. This cost may have an effect on accessibility to cross-river facilities and social connections. However, this impact may be mitigated through the provision of the east London low-income residents' discount (subject to eligibility).

For those who continue to use personal vehicles for travel cross river, the improved journey times and reliability will help to mitigate the potential financial costs. The overall impact on accessibility is considered to be neutral.

LTDS data shows that Black Londoners are slightly more likely to use PHVs for travel than other ethnic groups. Due to the user charges for non-ZEC and non-wheelchair accessible PHVs, there may be a potential increase in fares for these journeys.

This impact is considered to be limited and offset by improvements to journey times and availability of alternatives, including the bus (with new and improved services cross-river) and taxis. Furthermore, the improvements in journey times and congestion may improve the availability of PHVs for cross-river trips.

### **8.1.7 Homeless People and Asylum Seekers/Refugees**

The new cross-river link and improved bus connections provide a greater access to services and facilities across the river for asylum seekers, refugees, and homeless people.

These groups may be more reliant on community transport provided by community or charitable organisations. The provision of a 100 per cent discount for community transport (Vehicles with 9+ seats) will benefit charities and organisations that support these groups and helps to ensure that these services are not reduced or cut due to the proposed user charges. These services will also benefit from reduced journey times and improved reliability due to the Scheme.

For some homeless people, asylum seekers and refugees who drive, the proposed user charges may present a financial barrier, and some may face barriers to applying for Auto Pay, meaning they are unable to benefit from cheaper off-peak charges. This could impact accessibility (including access to community facilities). However, the east London low-income residents' discount (subject to eligibility) in addition to improved journey times and reliability, and improved bus speeds and service provision through the tunnels help to offset potential negative impacts on accessibility for people who make regular cross-river trips for work and training purposes, with a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys and free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents and a cross-river cycle shuttle-bus.

Some homeless people, asylum seekers and refugees may be less able to demonstrate eligibility for the east London low-income residents' discount. However, this is considered



to be offset by improved bus speeds and service provision through the tunnels providing an alternative mode of travel. Furthermore, it is anticipated that only a small number of homeless people, asylum seekers and refugees will use the tunnels frequently and the improved journey times and reliability may offset the cost of the user charges if they decide to travel via the tunnels using private vehicle.

### **8.1.8 People on Low Incomes**

Parts of the LSA are considered relatively deprived, for example 96 per cent of LSOAs in Newham are in the 50 per cent most income deprived deciles in England, with 87 per cent of LSOAs in Tower Hamlets and 77 per cent in Greenwich. In addition, a high proportion of the population have no access to a car. These people are therefore likely to be more reliant on walking, cycling and public transport than other groups. The baseline showed that 29 per cent of the population in the north LSA and 23 per cent in south are economically inactive.

Whilst we have proposed the east London low-income residents' discount to help support people on low incomes, the proposed user charges may still present a financial barrier for some people on lower incomes, and some may not meet eligibility for the east London low-income residents' discount. This may lead to changes in cross-river travel and impact accessibility.

Londoners on lower incomes are more likely to travel by bus than drive. The improvements to cross-river public transport through the introduction of new and improved bus services through the Silvertown and Blackwall tunnels will help mitigate potential negative impacts on ability to travel through the tunnels. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys, free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V and a cross-river cycle shuttle-bus, free for at least 12 months. Some people on low incomes may also be eligible for the Bus and Tram Discount Photocard or Jobcentre Plus Travel Discount (subject to eligibility) providing reduced fares on buses. The bus and DLR concessions proposed as part of the green and fair package of concessions and discounts could have a greater positive impact for people on low incomes, whose most common mode of travel in London is bus, compared to people not on low incomes.

Therefore, whilst low-income groups may experience a reduced ability to pay cross river vehicle charges compared to those on higher incomes, the provision of new bus routes together with improvements to journey times and reliability for existing routes will help offset this impact. This will also increase access to a wider range of additional services and facilities.

Low-income residents who use the tunnels for travel regularly, will benefit from improved journey times and reliability when travelling by private vehicle.

The community transport (Vehicles with 9+ seats) 100 per cent discount helps ensure that people on low incomes reliant on community and charitable transport for cross-river travel to access education, community and religious facilities are not negatively impacted due to reduced or cut services resultant of the proposed user charges. Access to these facilities will also be improved through improved journey times.

The inclusion of the NHS patient reimbursement of the proposed user charges will help ensure that some people on low incomes requiring use of a private vehicle to access healthcare appointments cross-river are not negatively impacted by the proposed user charges (subject to eligibility).

Improved journey times will be experienced by people on low incomes using the tunnels to access healthcare services but are required to pay the charge, helping to ensure appointments are not missed. These residents may also be eligible for the east London low-income residents' discount helping to mitigate the potential financial impact.

### **8.1.9 Pregnancy and Maternity**

The Barkantine Birth Centre, Newham Hospital, and Queen Elizabeth Hospital are located in close proximity to the LSA and provide maternity services.<sup>71</sup>

Pregnant and maternal people may prefer travel by car for comfort and safety purposes. Some may be eligible for the east London low-income residents' discount, and all will benefit from improved accessibility due to improved journey times and reliability, which may also lead to improved access to a greater range of facilities and lower risk of missing appointments. Some may also be eligible for the NHS Patient reimbursement scheme when travelling for medical appointments.

Some pregnant and maternal people may prefer to use PHVs. Due to the user charges for non-ZEC and non-wheelchair accessible PHVs, there may be a potential increase in fares for these journeys. This impact may be offset by improvements to journey times and availability of PHVs for cross-river trips.

### **8.1.10 Sex**

The Scheme will provide a new cross-river link and improved bus connections to education, healthcare, community facilities and places of worship both sides of the river. The baseline data (Section 6.4.2) showed that women are slightly more likely to travel by bus than men. Women will benefit from the new cross river link, new bus services and wider public transport connections.

Men are more likely than women to travel across the river at least once per week, but women are more likely than men to use public transport for this journey. However, women are more likely than men to have concerns regarding their personal safety when using public transport. The proposed user charges may have a negative financial impact on women who use a personal vehicle to regularly travel cross-river due to personal safety concerns when using public transport. This cost may influence accessibility to cross-river services and social connections. This impact may be mitigated through the provision of the east London low-income residents' discount (subject to eligibility). Additionally, we are committed to improving safety and reducing harassment and violence across our public

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<sup>71</sup> [NHS Maternity Services](#)

transport network. The ongoing work we are undertaking to improve safety and security and raise awareness for customers on how to help prevent, report or call out harassment and assault may help women feel more comfortable travelling cross-river using public transport.

For those who continue to use personal vehicles for travel cross river, the improved journey times will help to mitigate the potential financial costs.

Due to the charge for non-ZEC and non-wheelchair accessible PHVs using the tunnels, there may be potential increases in fares for these journeys. LTDS data shows that women are slightly more likely to use PHVs for travel than men. This impact is considered to be limited and offset by improvements to journey times and availability of alternatives (such as taxis).

### **8.1.11 Sexual Orientation and Gender Reassignment (LGBT)**

The baseline data (Section 7.8) shows that around three per cent of the population in the LSA and Sub-Region are LGBT. LGBT people are more likely to face challenges when using public transport due to crime, intimidation and abuse.

The proposed user charges may have a negative financial impact on a small number of LGBT people who use a personal vehicle to regularly travel cross-river due to fear of harassment on public transport. This cost may influence accessibility to cross-river services and social connections. This impact may be mitigated for some through the provision of the east London low-income residents' discount (subject to eligibility). Additionally, we are committed to improving safety and reducing harassment and violence on our public transport network. The ongoing work we are undertaking to improve safety and security and raise awareness for customers on how to help prevent, report or call out harassment and assault may help LGBT people feel more comfortable travelling cross-river using public transport.

For those who continue to use personal vehicles for travel cross river, the improved journey times will help to mitigate the potential financial costs. Furthermore, some trans people may be eligible for the NHS patient scheme when travelling to healthcare facilities.

Due to the charge for non-ZEC and non-wheelchair accessible PHVs using the tunnels, there may be potential increases in fares for these journeys. This may impact LGBT people who prefer to use PHVs to access services and social connections cross-river due to barriers to public transport use. This impact is considered to be limited and offset by improvements to journey times and availability of alternatives (such as taxis). Furthermore, the improvements in journey times and congestion may improve the availability of PHVs for cross-river trips.

## **8.2 Access to Work and Training**

### **8.2.1 Introduction**

Access to work and training can have beneficial impacts on both the health and life prospects of local populations. The Scheme is located in some of the most economically deprived areas of London.

As stated in the UCAF, the forecast reduction in vehicle journey time and improvement in journey time reliability through the Blackwall Tunnel will benefit local residents. In the opening year, car commuters are forecast to save 1,500 vehicle-hours per day with public transport commuters saving 900 passenger-hours per day (07:00-19:00). Faster and more reliable journey times will also apply to those commuting or travelling for work by van. Although the proposed user charges will be a new cost for residents, the overall value of time savings to tunnel users is forecast to outweigh the cost, resulting in a net benefit. Some residents from low-income households will also qualify for a discount to reduce the cost of the user charge for motorcycles, cars and vans.<sup>72</sup>

New cross-river bus routes (129 & SL4) and lower journey times on the Route 108 mean residents on the Greenwich Peninsula will be able to access over 43,000 more jobs within a 60-minute journey. Similarly, residents of West Silvertown will be able access over 21,000 more jobs within a 60-minute journey.

People travelling for work and business purposes will also see benefits to their commute. The UCAF states that the forecast reduction in vehicle journey time and improvement in journey time reliability through the Blackwall Tunnel will be particularly beneficial for businesses. In the opening year, people travelling on business (including light goods vehicles and heavy goods vehicles drivers) are forecast to save 5,800 vehicle-hours per day due to the Scheme. Furthermore, for at least 12 months following Scheme opening small businesses, sole traders and charities based in the host boroughs will benefit from a £1 discount on the standard off-peak charges (subject to eligibility).

However, there is potential for the financial impacts of the proposed user charges to influence the ability for some protected characteristic and disadvantaged groups, who currently travel cross river by motorcycle, car or van to access work and training. While van charges are proposed to be higher, van ownership in the host boroughs and across London is comparatively low (see Section 7.2.3).

### 8.2.1.1 Summary

Table 46 summarises the overall equality impacts of the proposed user charges on Access to Work and Training. Sections 8.2.2– 8.2.6 provide further details on the factors which have been considered as part of this assessment and the conclusions reached.

**Table 46: Access to Work and Training Summary**

<b>Summary</b>	<p>The 100 per cent discount for Blue Badge Holders and exemption for disabled tax class vehicles helps to ensure that access to work and training is not impacted for eligible disabled people who may be more reliant on use of a car for cross-river travel.</p> <p>Similarly, the exemption for taxis and ZEC and wheelchair accessible PHVs, and community transport (Vehicles with 9+ seats) 100 per cent discount ensure disabled people who may be reliant on these vehicles for access to work and training are not impacted by reduced service provision (or increased fares) due to the proposed user charges. Thus, helping to eliminate unlawful discrimination, advance equality of</p>
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<sup>72</sup> Passenger carrying vehicles not exceeding 2.44m in height

opportunity, and foster good relations by enabling disabled people who may be reliant on car, wheelchair accessible PHVs or community transport vehicles to benefit from improved to access work and training.

The 100 per cent discount for community transport (Vehicles with 9+ seats) may also ensure homeless people and asylum seekers and refugees reliant on these vehicles for access to work and training opportunities are not impacted by reduced or cut services, helping to eliminate unlawful discrimination, advance equality of opportunity and foster good relations by enabling those who may be reliant on community transport vehicles to benefit from improved to access work and training.

The east London low-income residents' discount will help to mitigate potential negative impacts on access to work and training for eligible people on low incomes who travel frequently by private vehicle including van. This may also benefit people who also fall into other groups who are more likely to be on low incomes, such as older people, Black, Asian and minority ethnic people, and disabled people. Thus, helping to eliminate unlawful discrimination, advance equality of opportunity and foster good relations by ensuring people on low incomes who may be reliant on the car or community transport vehicles are able to benefit from improved to access work and training by private vehicle.

For at least 12 months following Scheme opening small businesses, sole traders and charities based in the host boroughs will benefit from a £1 discount on the standard off-peak charges (subject to eligibility).

Negative impacts associated with the proposed user charges on access to work and training for those not eligible for discounts and exemptions are considered to be offset by improved travel times. Furthermore, the provision of improved cross-river bus services, with improved journey times and service reliability is considered to provide a viable alternative mode of travel cross-river. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4. Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport and cycling for cross-river journeys in southeast London.

The improvements to cross-river accessibility by public transport and other vehicles are considered to help advance equality of opportunity and foster good relations by improving access to cross-river work and training.

If the user charges were to lead to an impact on the number of care workers travelling cross-river, existing pressures on the provision of

	<p>domiciliary care in east London may be exacerbated, and if changes in the level of care were seen it could lead to a disproportionate negative impact on disabled people and older people, who are more likely to be in receipt of care. Furthermore, if the user charges were to negatively impact on the provision of care cross-river by voluntary and charitable organisations, this could negatively impact on multiple protected characteristic and disadvantaged groups in London, including young people, older people, disabled people, homeless people, and asylum seekers and refugees. Due to the demographics of the local area, there may also be indirect negative impacts on people on low incomes and ethnic minority groups.</p> <p>A potential disproportionate negative impact has been identified on access to work for PHV drivers on low incomes due to the proposed user charges for non-ZEC and non-wheelchair accessible PHVs. This impact is expected to reduce over time as vehicles are upgraded to meet licensing requirements. Due to the demographics of PHV drivers, this could have a secondary disproportionate impact on people of Asian ethnicity and Muslims.</p> <p>It is considered that the proposed user charges, with the proposed discounts and exemptions, demonstrate that they have been developed with due regard for the three objectives under S.149(1) of the Equality Act 2010, and do not lead to an overall disproportionate or differential impact on access to work and training for any protected characteristic or disadvantaged groups.</p>
<b>Overall rating of impact</b>	Neutral
<b>Overall Impacts identified for protected characteristic and disadvantaged groups</b>	<p>A potential disproportionate negative impact on access to work has been identified for PHV drivers on low incomes who do not own a ZEC or wheelchair accessible PHV. These drivers may lose out on work opportunities as they may be unable to cover the user charges themselves or could potentially lose out on bookings where they add the charge to the fare. Whereas PHV drivers with ZEC vehicles may be able to offer a lower fare due to their 100 per cent discount.</p> <p>If the user charges were to lead to an impact on the number of care workers travelling cross-river, existing pressures on the provision of domiciliary care in east London may be exacerbated, and if changes in the level of care were seen it could lead to a disproportionate negative impact on disabled people and older people, who are more likely to be in receipt of care. Furthermore, if the user charges were to negatively impact on the provision of care cross-river by voluntary and charitable organisations, this could negatively impact on multiple protected characteristic and disadvantaged groups in London, including young people, older people, disabled people, homeless people, and asylum seekers and refugees. Due to the demographics of the local area,</p>

<b>Mitigations required</b>	<p>there may also be indirect negative impacts on people on low incomes and ethnic minority groups.</p>
	<p>The potential impact on PHV drivers will diminish over time as PHVs are replaced with ZEC vehicles to meet licensing requirements, with all PHVs expected to be ZEC by 2033. It is therefore considered that no mitigation is required. PHV drivers on low incomes may also be eligible for the east London low-income residents' discount, helping to offset the cost.</p>
	<p>Whilst we believe that our proposed discounts and exemptions will help to mitigate negative impacts on the provision of care whilst ensuring we achieve our project objectives, it is important that we monitor how the scheme is affecting cross-river care provision and ensure we seek to address these impacts should they have a negative impact on protected characteristic and disadvantaged groups. In line with Policy 15 of the CPAP, we will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening.</p> <p>Additionally, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended that we provide targeted communications to carers to raise awareness of the discounts and exemptions they or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan.</p>

### 8.2.2 Age

The baseline data (Section 7.3.3) shows that people aged 35-44 are the age group most likely to cross the Thames at least once a week for travel to work (commuting) purposes, at 34 per cent. This is followed by people aged 16-34 (30 per cent) and people aged 45-54 (28 per cent). Only three per cent of people aged 65+ cross the Thames to commute to work.

Public transport has a larger share across all age groups, particularly among people aged under 35 and aged 55-64. People aged 35-64 are the most likely age group to cross the Thames by car (as a driver or passenger).

The proposed user charges may present a financial barrier to a small number of working age people seeking or accessing existing work and training opportunities, particularly for those on low incomes who require their vehicle to access to work and training cross-river. This potential negative impact is offset by the inclusion of the east London low-income residents' discount (subject to eligibility). Additionally, the improvements to existing bus service journey times and introduction of two new bus services through the Silvertown Tunnel helps to ensure that alternatives modes of travel are available. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

Furthermore, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys to support local residents, free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V and a cross-river cycle shuttle-bus free for at least 12 months. All TfL buses are wheelchair accessible and travel by wheelchair or mobility scooter is free on buses, and the entire DLR network is step-free.

For those not eligible for the discount and requiring use of their vehicle to access work and training, the improvements in journey times and reliability help to mitigate the financial impact of the proposed user charges.

Furthermore, the improved cross-river journey times by car and by bus may increase the catchment of jobs within commuting distance of their place of residence, increasing accessibility to new opportunities.

Taxi drivers in London are more likely to be older, with 62 per cent aged 54 years and above. The exemption for London Licensed Taxis will help to ensure that taxi drivers do not experience an increase in personal costs to undertake cross-river bookings. These drivers will also benefit from the improved journey times due to reductions in congestion when undertaking cross-river bookings. The improved journey times and reliability may also enable them to undertake more jobs during their working hours.

### **8.2.3 Disability**

The baseline data (Section 7.9.3) shows that five per cent of disabled people cross the Thames in east/southeast London for commuting to work purposes at least once a week. This is significantly lower than for non-disabled people (30 per cent). Disabled people are also more likely to be unemployed than non-disabled people. The car is an important mode of travel for many disabled people due to the barriers faced when trying to access public transport.<sup>73</sup> The baseline data (Section 7.9.2) also shows that around one quarter of disabled Londoners travel by car as a driver at least once per week. Some disabled Londoners may prefer or need to travel by this mode due to barriers or challenges using public transport (including safety and harassment concerns). Disabled people who prefer or need to drive may be negatively impacted by the proposed user charges. However, they will benefit from the improvements to journey times and journey reliability from the Scheme in addition to the increased accessibility provided by the improvements to journey times. To help mitigate negative impacts on accessibility for disabled people resultant of the user charges, we have proposed a number of discounts, exemptions, reimbursements and travel concessions.

Disabled people who are Blue Badge Holders will benefit from the proposed 100 per cent discount for Blue Badge Holders. Furthermore, disabled people with a disabled tax class vehicle will benefit from the proposed exemption for vehicles with a disabled tax class. These discounts and exemptions help to ensure that disabled people who may need to travel by car do not experience reduced access to work and training resultant of the financial implications of the proposed user charges.

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<sup>73</sup> [Motability \(March 2022\), The Transport Accessibility Gap](#)



Some disabled people will also be eligible for the east London low-income residents' discount, helping to mitigate the impact of the proposed user charges on disabled people. Previous research has shown that around 61 per cent of disabled Londoners are on low incomes.<sup>74</sup>

Furthermore, for those who choose to switch modes due to the financial cost of the user charge, we offer a free Travel Mentoring Scheme to help people using public transport in and around London to become more confident and independent travellers. Travel mentors can give advice by telephone and email to help plan an accessible route, provide a mentor to accompany people on their first few practice journeys to help them learn how to travel the network independently, and assist virtually using apps available on most smartphones.

New and improved routes will help to provide a suitable alternative mode of travel for disabled people who switch modes due to the proposed user charges. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4. Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London, which will help support disabled people not eligible for or not in receipt of our existing public transport travel concessions for disabled people. This includes free pay as you go cross-river bus journeys to support local residents, free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V and a cross-river cycle shuttle-bus, free for at least 12 months. All TfL buses are wheelchair accessible and travel by wheelchair or mobility scooter is free on buses, and the entire DLR network is step-free.

Some disabled people may access work and training opportunities via community transport vehicles provided by local authorities and charitable organisations. The inclusion of a 100 per cent discount for community transport (Vehicles with 9+ seats) means that disabled people who are reliant on the use of these vehicles to access work and training opportunities are not negatively impacted by a charge leading to reduced or cut services. Access to cross-river opportunities will also be improved through improved journey times.

Some disabled people may be transported to work or training by a carer such as a PA, or a voluntary or informal carer. As highlighted in Section 8.2.6, there is a risk that the user charges could lead to negative impacts on the provision of care cross-river. If this impact were to arise, it could have a disproportionate negative impact on access to work and training opportunities for disabled people if they are unable to travel to work or training without assistance.

Within our proposed user charges, there are certain discounts and exemptions in place which may help to mitigate this potential impact. This includes the 100 per cent discount for Blue Badge holders. A maximum of two vehicles can be registered to a Blue Badge holder's account to receive the discount, which may be of benefit for people providing travel for the person they provide care to as part of their duties.

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<sup>74</sup> [TfL \(2019\), Travel in London: Understanding our diverse communities](#)

A person providing domiciliary care or employed as a PA may be the nominated driver for a person with a disability who is entitled to or owns a vehicle in the disabled tax class. This may allow their vehicle to be eligible for an exemption from the user charges.

A carer may also be eligible for a 50 per cent discount on the user charges if living in east London and in receipt of certain income-related benefits, including carer's allowance. If living in the same household as the person who is eligible for the east London low-income resident's discount, they may also be able to apply the discount to their vehicle if no other vehicle in the household has been registered to the eligible Road User Charging account.

Whilst we believe that our proposed discounts and exemptions will help to mitigate negative impacts on the provision of care whilst ensuring we achieve our project objectives, it is important that we monitor how the scheme is affecting cross-river care provision and ensure we seek to address these impacts should they have a negative impact on protected characteristic and disadvantaged groups. In line with Policy 15 of the CPAP, we will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening.

Additionally, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended that we provide targeted communications to carers to raise awareness of the discounts and exemptions they or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan.

Due to the barriers faced when using public transport, taxis and PHVs may provide an important mode of travel for disabled people, particularly those who are unable or choose not to drive. Taxi and PHV usage are similar for disabled and non-disabled Londoners. However, LTDS data shows (Section 6.9.2) that disabled people in the host boroughs use PHVs more regularly than non-disabled people.

It is important to recognise the role these may play for disabled people in accessing work and training opportunities. Disabled people who use taxis and PHVs for cross-river travel to work and training will benefit from the exemption from the proposed user charges for taxis (all of which are wheelchair accessible and have other accessibility features) and wheelchair accessible PHVs. This will help ensure that there is no reduction in the number of available taxis, and that the availability and cost of using wheelchair accessible PHVs does not impact accessibility for disabled people. This exemption could have a disproportionate positive impact on access to work and training for disabled people reliant on the use of taxis and wheelchair accessible PHVs.

However, non-ZEC and non-wheelchair accessible PHVs will pay the proposed user charges. Approximately one per cent of the PHV fleet are wheelchair accessible. Therefore, disabled people using PHVs regularly may be more likely to use a non-wheelchair accessible PHV. Circa 43 per cent of PHVs are ZEC as of February 2024, and this number will continue to increase as vehicles are upgraded to meet licensing requirements. The entire PHV fleet is expected to be ZEC by 2033.

Due to the flexibility of fares in the PHV industry, drivers may be able to add this additional cost into their pricing structure for undertaking cross-river bookings, as per the terms and conditions of the larger third-party booking companies which state that tolls are added to fares, and as seen in the Congestion Charge Zone where the charge is added to fares by

the largest providers. However, the improvements to journey times will help mitigate this cost. Furthermore, some disabled people using PHVs may also be eligible for subsidised travel through the Taxicard scheme. A small number of PHV drivers may refuse cross-river bookings, but this is likely to be a limited number, and alternatives (such as taxis and PHVs provided by alternative operators) are available. The improvements in congestion for cross-river travel may also increase the number of PHV drivers willing to undertake cross-river bookings.

It is considered that the overall impact of charging non-ZEC and non-wheelchair accessible PHVs is neutral on access to work and training for disabled people.

#### **8.2.4 Homeless People and Asylum Seekers/Refugees**

Homeless people and Asylum Seekers/Refugees may be more reliant on community transport provided by community or charitable organisations to access work and training opportunities.

The provision of a 100 per cent discount for community transport (Vehicles with 9+ seats) helps to ensure that these services are not reduced or cut due to the proposed user charges. These services will benefit from reduced journey times and improved reliability due to the Scheme.

For some homeless people, asylum seekers and refugees who drive, the proposed user charges may present a financial barrier to accessing existing or potential work and training opportunities cross-river, and some may face barriers to applying for Auto Pay, meaning they are unable to benefit from cheaper off-peak charges. However, the east London low-income residents' discount (subject to eligibility) in addition to improved journey times and reliability, and improved bus speeds and service provision through the tunnels help to offset potential negative impacts on accessibility for people who make regular cross-river trips for work and training purposes.

Some homeless people and Asylum Seekers/Refugees may be less able to demonstrate eligibility for the east London low-income residents' discount. However, this is considered to be offset by improved bus speeds and service provision through the tunnels providing an alternative mode of travel. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys to support local residents, free pay as you go DLR journeys (refunded) between Cutty Sark –Island Gardens and Woolwich Arsenal – King George V and a cross-river cycle shuttle-bus, free for at least 12 months.

#### **8.2.5 People on Low Incomes**

As shown in the baseline data (Section 7.13.5), income deprivation levels are high in the local area. However, people on low incomes in London are less likely to drive at least once per week and less likely to own a car, and more likely to travel by bus. The baseline data also shows that people in lower social grades (C2, D, E) are much less likely to travel

across the Thames in east and southeast London for travel to work purposes. However, they are more likely to travel by car than people in higher social grades when travelling across the Thames in this area.

The proposed user charges may present a financial barrier for some people on lower incomes who travel by car. This may lead to changes in cross-river travel and impact access to work and training opportunities which the Silvertown Tunnel provides improved access to. However, residents on low incomes may be eligible for the east London low-income residents' discount. This could mitigate negative changes in access to work and training resulting from the financial impact of the proposed user charges. In addition, the improvements to the public transport cross-river through the introduction of new bus services through the Silvertown Tunnel will help to mitigate potential negative impacts on ability to travel through the tunnels. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys to support local residents, free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V and a cross-river cycle shuttle-bus, free for at least 12 months. Some people on low incomes may also be eligible for the Bus and Tram Discount Photocard or Jobcentre Plus Travel Discount (subject to eligibility) providing reduced fares on buses. The bus and DLR concessions proposed as part of the green and fair package of concessions and discounts could have a greater positive impact for people on low incomes, whose most common mode of travel in London is bus, compared to people not on low incomes.

As shown in the baseline data, the bus is the most common mode of travel for people on low incomes behind walking. For low-income residents who choose to continue to drive through the tunnels for access to work and training, the reductions in journey times and reliability may offset the financial cost.

Non-ZEC and non-wheelchair accessible PHVs will pay the proposed user charges. As of January 2024, circa 43 per cent of PHVs are fully electric/ZEC, and it is expected that the entire fleet will be ZEC by 2033. Less than one per cent of PHVs are wheelchair accessible.

Due to the flexibility of fares in the PHV industry, drivers may be able to add this additional cost into their pricing structure for undertaking cross-river bookings, as per the terms and conditions of the larger third-party booking companies which state that tolls are added to fares, and as seen in the Congestion Charge Zone where the charge is added to fares by the largest operators. However, ZEC PHVs would not incur this charge which could lead to a lower fare for customers in some cases. As fares vary by a number of factors, it is difficult to determine to what extent this may impact drivers of non-ZEC PHVs.

Previous licensing data has shown a correlation between where PHV drivers live and areas of the highest deprivation in London. Therefore, the proposed user charges may have a disproportionate negative impact on access to work for PHV drivers on low incomes who drive a non-ZEC PHV or non-wheelchair accessible PHV.

Due to the demographics of PHV drivers, this could have a secondary disproportionate impact on people of Asian ethnicity and Muslims. Our data<sup>75</sup> on the race of PHV drivers in London highlights that 42 per cent are Asian and 15 per cent are Black. 28 per cent reported their religion as Islam/Muslim. However, actual figures may be different as a large proportion of drivers declined to state their race or religion.

Specific mitigations are not considered necessary for this potential impact. Circa 43 per cent of PHVs in London are ZEC, and this proportion will continue to increase as vehicles are replaced with ZEC vehicles to meet licensing requirements and should therefore be fully mitigated by 2033. The impact will therefore diminish over time. Furthermore, PHV drivers who live in the area may be eligible for the east London low-income residents' discount, helping to offset the cost. Some may also be eligible for the £1 discount on the standard off-peak charges for small businesses and sole traders registered in the host boroughs for at least one year following tunnel opening (subject to eligibility).

The 100 per cent discount for ZEC and wheelchair accessible PHVs only applies when the PHV driver is undertaking a booking. Therefore, all PHV drivers may have to cover the user charges to travel cross-river to undertake a new booking or return to the other side of the river (if this is not covered by the operator). PHV drivers on low incomes operating in the area may be eligible for the east London low-income residents' discount when using the tunnels and not undertaking a booking. They may also be able to use alternative crossings (such as Rotherhithe) to negate this charge to return to the opposite side of the river for bookings or return cross-river with a new booking.

Due to the flexibility of fares in the PHV industry, drivers may be able to add this additional cost into their pricing structure for undertaking cross-river bookings, as per the terms and conditions of the larger third-party booking companies which state that tolls are added to fares, and as seen in the Congestion Charge Zone where the charge is added to fares by the largest operators.

### **8.2.6 Carers**

As highlighted in Section 7.12, care workers are amongst the lowest paid workers in the UK. Many people working in the domiciliary care sector are not paid for time spent travelling between jobs, and in Greater London a large proportion of domiciliary care workers drive to carry out their work duties. Whilst many have their travel expenses covered, this ultimately comes at a cost to the organisations, many of whom have expressed concern about the rising costs of covering travel for care workers.<sup>76</sup>

If carers are not reimbursed for the user charges by their employer, the additional work-related cost may impact their take-home earnings and some care workers may decide to change jobs if they are required to regularly travel cross-river via the tunnels, in particular where this route could not be avoided or offers the most convenient route to effectively carry out their work. Furthermore, the user charges may present a disincentive to care workers (existing or prospective) taking up care roles cross-river. Therefore, there may be a disproportionate negative impact on access to work and training for domiciliary care

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<sup>75</sup> TfL Data (December 2023)

<sup>76</sup> [Homecare Association \(March 2022\) Fuel costs and homecare – impact on service capacity](#)

workers on low incomes. Due to the demographics of care workers in London, this may disproportionately impact women, and people from ethnic minority backgrounds.

Nevertheless, it must not be overlooked that the improvements in journey times and reliability may conversely make access to work opportunities cross-river more viable, and lead to improvements in the ability of carers and care organisations to effectively provide care cross-river. Our research also indicates that care staff travel costs are often covered by employers – and this may include the cost of the user charge. Due to many care workers being on low incomes, those who are not reimbursed by their employer but are on low incomes may be eligible for the east London low-income residents' discount.

If carers are reimbursed by their employer for the user charges, and this has not been or cannot be factored into the cost for the provision of care, it may negatively impact on an organisation's budgets. This may be a particular challenge for organisations which are currently contracted to provide care cross-river, but an existing contract does not cover the user charges. If care providers are not able to have the user charges factored into the cost of care when commissioning services, they may choose not to accept care contracts which require cross-river travel due to the potential impact on their budgets.

If the user charges were to lead to an impact on the number of care workers travelling cross-river, existing pressures on the provision of domiciliary care in east London may be exacerbated, and if changes in the level of care were seen it could lead to a disproportionate negative impact on disabled people and older people, who are more likely to be in receipt of care. Furthermore, if the user charges were to negatively impact on the provision of care cross-river by voluntary and charitable organisations, this could negatively impact on multiple protected characteristic and disadvantaged groups in London, including young people, older people, disabled people, homeless people, and asylum seekers and refugees. Due to the demographics of the local area, there may also be indirect negative impacts on people on low incomes and ethnic minority groups.

Following feedback from the consultation with stakeholders and the public, we considered the potential impacts our proposed user charges on carers, and whether a targeted support option for carers was required as part of our proposals. Following this review, we have decided that we will not provide this as part of our initial user charges. This is due to the administrative challenges which may be faced in identifying care workers, the need for regular review of eligibility for any form of targeted support due to the high turnover rates in the industry, and the fact that many carers (if not reimbursed by an employer) may be eligible for our existing support options. Additionally, although a care organisation may be based in the local area, some of their staff may be commuting from areas outside of the host boroughs/east London, and some organisations may also be based outside of the host boroughs/east London but provide care services cross-river. Therefore, we would likely require a wide geographic scope for a support option. This would increase the number of carers potentially eligible for the support option and risk undermining our Project Objectives.

In addition to the east London low-income residents' discount, which we believe many carers may be eligible for in east London, if travelling with the person in receipt of care some carers may also be able to register their vehicle to the Auto Pay account of the person they are providing care to prior to travel in order to receive a 100 per cent discount on the user charges. A maximum of two vehicles can be registered to a Blue Badge

holder's account to receive the discount. This may also be of benefit for people working as a PA or provide care to an individual on a voluntary basis.

If a care organisation is a charity, small business (under 50 employees) or the carer is a registered sole trader based in the host boroughs, they may also be eligible for a £1 discount on the standard off-peak user charges for at least one year after the tunnel opens if the vehicles the carers use are registered to the charity/organisation's Auto Pay account. Some care workers (such as PA's) may be registered as sole traders and some carers may be eligible for free pay as you go bus and certain DLR river crossings, available for at least one year after the tunnel opens,

Some carers may also work on a voluntary basis through charitable organisations or provide informal care to family or friends. The Blackwall Tunnel may currently provide a convenient route for cross-river travel to undertake their care duties, and some may not be reimbursed for their travel costs, particularly as some voluntary organisations may have limited budgets and flexibility, and those providing informal care may be on low incomes. We received feedback during the consultation that some charities don't have their own vehicles but reimburse their staff for use of their private vehicles.

To help support charities transition to paying user charges, we have proposed a £1 discount on the off-peak user charges for small business, sole trader and charities registered in the host boroughs (subject to eligibility). To qualify for the discount, the vehicle needs to be registered for an Auto Pay account in the name of the charity. This is to manage the eligibility criteria of a maximum of three vehicles and limit the potential for fraud.

Following the consultation, we have reviewed the option of charities' employees or volunteers registering private vehicles to receive the discount on behalf of the charity. However, if a private vehicle was registered for the discount on behalf of a charity, each trip made in this vehicle would receive the reimbursement, regardless of whether the trip was made on behalf of the charity or not. This would further risk undermining the demand management objective of the scheme and be open to fraud.

Furthermore, there are other discounts which may apply to certain trips helping to mitigate the potential impacts including a 100 per cent discount for community transport (Vehicles with 9+ seats), 100 per cent discount for certain operational vehicles of the host boroughs such as meals on wheels, and the 50 per cent discount for east London low-income residents.

While we do not propose a targeted support option for carers in paid and voluntary, and informal roles as we believe our existing proposed support options alongside the improvements to journey times and reliability will help to ensure impacts on the provision of care cross-river do not arise, it is important that we closely monitor whether changes occur resultant of the user charges. Policy 15 in the CPAP states we must undertake a review of the user charges not later than 15 months after the Silvertown Tunnel opens for public use, and that we must make changes to the charges to mitigate any significant adverse impacts that have arisen and are attributable to the Scheme. Procedure 5 explains how this review will be undertaken.

Following the opening of the Silvertown Tunnel, we will continue to monitor the impacts (traffic, socio-economic, noise and air quality), and implement any mitigations required, as

set out in Policy 15 of the CPAP. It is recommended that as part of this review, we consider whether any negative impacts on the provision of care cross-river have arisen, and whether any additional support is required.

Additionally, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended that we provide targeted communications to carers to raise awareness of the discounts and exemptions they or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan.

## **8.3 Active Travel**

### **8.3.1 Introduction**

The proposed user charges may impact the mode people choose to travel and could lead to an increase in walking and cycling. Active travel may form part of a stage of a journey to use the new and improved bus services through the tunnels. To help support these additional active travel journey stages, we have undertaken various actions in different areas. In Greenwich, we have upgraded the Boord Street footbridge to provide an accessible link over the A102 to allow access to the bus stop on Tunnel Avenue and will resurface the footways in this area to improve the quality of the pedestrian environment. On the north side of the river, we are making improvements at the Lower Lea Crossing and Leamouth roundabout including wider footpaths and cycleway, kerb buildouts to reduce crossing distance, and improve existing crossing points by adding signalised priority for pedestrians and cyclists as well as adding new crossing points.

Additionally, our preferred option of a new cross-river cycle shuttle-bus (free for at least 12 months) proposed to operate through the Silvertown Tunnel may encourage the use of cycling as a mode of travel for cross-river journeys, in place of using a private vehicle which may be subject to the proposed user charges.

The affordability of the proposed user charges and their role as a demand management tool may result in mode shift which could see an increase in certain groups using active travel modes to a greater extent than others.

Changes in traffic levels and speeds resulting from the proposed user charges may impact perceptions of safety in certain locations and as a result cause reductions in active travel, which may impact certain groups due to the location of these changes. Conversely, reductions in congestion and traffic can lead to improved perceptions of safety.

It is important for us to ensure that the Scheme does not negatively impact opportunities for active travel due to the health benefits of this mode of travel. The baseline data shows that walking is the most common mode of travel for all Londoners, whilst cycling is less likely to be undertaken by women, non-White people, and people on low incomes.

Table 47 summarises the overall equality impacts of the proposed user charges on Active Travel.



## 8.3.2 Summary

**Table 47: Active Travel Summary**

<b>Summary</b>	<p>The scheme is not anticipated to cause any significant changes in the ability of people of all groups to undertake active travel due to minor changes in traffic levels on local roads.</p> <p>Some people may switch modes from car to public transport to make cross river trips as a result of user charges. This may lead to small scale increases in active travel as a stage of their journey.</p> <p>No disproportionate or differential impact on protected characteristic and disadvantaged groups identified.</p>
<b>Overall rating of impact</b>	Neutral
<b>Overall Impacts identified for protected characteristic and disadvantaged groups</b>	N/a
<b>Mitigations required</b>	N/a

## 8.3.3 Assessment

The UCAF concludes that traffic flow and composition is not forecast to change significantly on local roads because of the Scheme.

The volume of traffic (measured in terms of total daily vehicle-kilometres) in Greenwich, Tower Hamlets and Newham is forecast to decrease in all time periods, with the exception of Tower Hamlets in the evening peak (an increase of three per cent) and Newham in the morning peak (an increase of less than one per cent). These increases mostly occur on strategic routes (for example the A12) that are forecast to become more attractive to drivers due to a reduction in congestion on the Blackwall Tunnel approaches.

Traffic on some local roads such as Chrisp Street, Manor Road and Abbott Road is conversely forecast to decrease. In most time periods there is little change in the average speed of traffic, with the exception of an increase from 21kph to 24kph in the morning peak in Greenwich and an increase from 17kph to 19kph in the evening peak in Tower Hamlets. As with the changes in traffic flow, this is primarily caused by improved conditions on strategic routes in these boroughs linked to a reduction in queuing on the Blackwall Tunnel approaches.

The changes in traffic levels and speed due to the proposed user charges will not lead to overall deteriorations in road safety which would have a detrimental impact on protected characteristic and disadvantaged groups. Overall, the impact is neutral and the proposed user charges would not have a disproportionate or differential impact on active travel for protected characteristic and disadvantaged groups.

## 8.4 Air Quality

### 8.4.1 Introduction

The Scheme aims to reduce congestion and control increases in traffic flow through user charging. Changes in air quality can have a direct effect on exposure to pollutants and health and wellbeing of populations, including vulnerable populations and particular protected characteristic groups.

The most deprived communities in London commonly live in the most polluted areas, and areas with the lowest NO<sub>2</sub> and PM<sub>2.5</sub> concentrations have a disproportionately white population.<sup>77</sup> As demonstrated in the baseline, the local area surrounding Silvertown and Blackwall tunnels have high levels of deprivation and high levels of racial diversity.

Disabled people (particularly with underlying health conditions), young people, older people and pregnant people are more vulnerable to the negative health impacts of poor air quality.

### 8.4.2 Summary

Table 48 summarises the overall equality impacts of the proposed user charges based on the forecast changes in Air Quality.

**Table 48: Air Quality Summary**

<p><b>Summary</b></p>	<p>Disabled people, young children, older people and pregnant people and their unborn child are more vulnerable to the negative impacts of poor air quality. Black, Asian and minority ethnic people and people on low incomes are more likely to live in areas with poorer air quality in London.</p> <p>As stated in the UCAF, the Scheme is forecast not to cause any exceedances of national air quality objectives. Due to the insignificant changes in NO<sub>2</sub> emissions forecast, there is not expected to be an overall disproportionate or differential impact on any Protected Characteristic or Disadvantaged Groups, and the impact is considered to be neutral.</p>
<p><b>Overall rating of impact</b></p>	<p>Neutral</p>

<sup>77</sup> [Aether \(June 2023\), GLA LAEI AQ Exposure and Inequalities study Part 1 - London analysis](#)

<b>Overall Impacts identified for protected characteristic and disadvantaged groups</b>	N/a
<b>Mitigations required</b>	N/a

### 8.4.3 Assessment

The Environmental Statement (2016) for the Scheme concluded that concentrations of PM<sub>10</sub> and PM<sub>2.5</sub> are predicted to be below their limit objectives and the impact of the Scheme on particulate concentrations to be generally imperceptible.

The Environmental Statement also concluded that CO<sub>2</sub> emissions were not significant in the base year (2012) and the opening year (anticipated to be 2021 at the time of the report), with and without the Scheme. Unlike NO<sub>x</sub> and PM<sub>10</sub>, emissions of CO<sub>2</sub> are directly linked to fuel use. As such, while advances in vehicle emissions technology result in an improvement in NO<sub>x</sub> and PM<sub>10</sub> emissions, which offset the increase in traffic between the base year and opening year, overall fuel use tends to increase across the network due to the additional number of vehicles anticipated between 2012 and 2021. Therefore, there is little difference between the CO<sub>2</sub> emissions for the base year and opening year.

Our latest modelling on air quality impacts of the Scheme demonstrate that this remains the case, given that the 2016 Environmental Statement demonstrated that the Scheme would have a negligible impact on particulates and a very small impact on carbon dioxide. Any expected changes in the traffic modelling outputs are unlikely to result in any material changes with respect to these impacts. CO<sub>2</sub> and PM<sub>10</sub> emissions will continue to be monitored after the Silvertown Tunnel opens.

As stated in the UCAF, the Scheme is forecast not to cause any exceedances of national air quality objectives (air quality limits and target values for a range of emissions that the UK must comply with for the purposes of National and Local Air Quality Management). Nitrogen dioxide (NO<sub>2</sub>) concentration on the A102 south of the Blackwall Tunnel is forecast to decrease by an average of 2.9 micrograms per cubic metre of air (µg/m<sup>3</sup>) due to the Scheme at the proposed user charge levels.

NO<sub>2</sub> concentration on Silvertown Way and Tidal Basin Road (on the northern approach to the Silvertown Tunnel) are forecasted to slightly increase (by 1.3 µg/m<sup>3</sup> and 0.7 µg/m<sup>3</sup> respectively). None of these changes are significant. NO<sub>2</sub> concentrations on the A12 north of the Blackwall Tunnel is expected to decrease by 2.4 µg/m<sup>3</sup>.

Little change is forecast in air quality on neighbouring crossings due to the Scheme. The Rotherhithe Tunnel southern portal is forecast to experience an insignificant increase in

NO<sub>2</sub> concentration (of 0.1 µg/m<sup>3</sup>) which does not exceed the national air quality objective for NO<sub>2</sub>.

Little change is forecasted in air quality on diversion routes and local roads due to the Scheme. An insignificant increase is forecast on the A12 south of Bow Roundabout (+0.7 µg/m<sup>3</sup> in NO<sub>2</sub> concentration). A small decrease in NO<sub>2</sub> concentration is forecast on the A13 East India Dock Road (-2 µg/m<sup>3</sup>), Cotton Street (-1.3 µg/m<sup>3</sup>), and Abbott Road (-0.6 µg/m<sup>3</sup>), one of the routes identified as benefitting from a forecast reduction in rat-running due to the Scheme.

Disabled people, young children, older people and pregnant people and their unborn child are more vulnerable to the negative impacts of poor air quality. Black, Asian and minority ethnic people and people on low incomes are more likely to live in areas with poorer air quality in London. However, due to the limited levels of change in air quality resultant of the Scheme, the impact is considered to be neutral for all relevant protected characteristic and disadvantaged groups.

## 8.5 Noise

### 8.5.1 Introduction

Changes to noise levels along key routes – both improvements to the current situation as well as increases in noise could occur as a result of the scheme and proposed user charges. These changes may occur in locations which result in a greater impact on certain protected characteristics or disadvantaged groups.

Young people and, some disabled people, and pregnant people may be more sensitive to negative health impacts of increased noise levels from vehicular traffic. People on low incomes and Black, Asian and minority ethnic people may live in areas where noise pollution resultant of vehicular traffic is greater.

### 8.5.2 Summary

Table 49 summarises the overall equality impacts of the proposed user charges based on the forecast changes in noise.

**Table 49: Noise Summary**

<b>Summary</b>	<p>Young children, some disabled people, and pregnant people may be more sensitive to noise pollution. People on low incomes and Black, Asian and minority ethnic people may live in areas where noise pollution resultant of vehicular traffic is greater.</p> <p>However, there is no disproportionate or differential impact identified on people due to noise resultant of the Scheme and the impact considered to be neutral.</p>
<b>Overall rating of impact</b>	Neutral

<b>Overall Impacts identified for protected characteristic and disadvantaged groups</b>	N/a
<b>Mitigations required</b>	N/a

### 8.5.3 Assessment

The UCAF concludes that noise levels on the tunnel approaches are forecast not to change due to the Scheme. An insignificant increase of 1.3 decibels (db) is forecast on Tidal Basin Road. The Scheme is forecasted not to have a noise impact on properties or justify property-specific noise insulation measures.

Noise levels at neighbouring crossings are forecast not to change due to the Scheme. The Scheme is forecast not to have a noise impact on properties or justify property-specific noise insulation measures.

Noise levels on diversion routes and local roads are not forecast to change due to the Scheme. Insignificant increases in noise (of 2.2db and 1.6db) are forecast respectively on Lower Lea Crossing and Aspen Way. Insignificant decreases in noise (of 2.5db and 1db) are forecast respectively on Abbott Road and the A13 East India Dock Road. The Scheme is not expected to produce any noise impact on properties or justify property-specific noise insulation measures.

Young children, some disabled people, and pregnant people may be more sensitive to noise pollution. People on low incomes and Black, Asian and minority ethnic people may live in areas where noise pollution resulting from vehicular traffic is greater. However, there is no disproportionate or differential impact identified on people due to noise resulting from the Scheme and the impact considered to be neutral.

## 8.6 Road Safety

### 8.6.1 Introduction

Changes in traffic volume and patterns as a result of the proposed user charges may impact road safety. Vulnerable populations and equalities groups may be particularly impacted by changes in road safety. Furthermore, some people may switch modes, increasing their use of active travel modes for part of or all of their journey.

People from more deprived areas, some ethnic minorities, disabled people, children and older people are disproportionately affected by road danger in London.<sup>78</sup>

As demonstrated in the baseline, walking is the most common mode of travel for all Londoners, whilst cycling is a popular mode of travel for young people below the age of 15.

### 8.6.2 Summary

Table 50 summarises the overall equality impacts of the proposed user charges on Road Safety.

**Table 50: Road Safety Summary**

<b>Summary</b>	People from more deprived areas, some ethnic minorities, disabled people, children and older people are disproportionately affected by road danger in London. However, no impacts on road safety due to changes in traffic levels and speeds on local roads resulting from the scheme have been identified.
<b>Overall rating of impact</b>	Neutral
<b>Overall Impacts identified for protected characteristic and disadvantaged groups</b>	N/a
<b>Mitigations required</b>	N/a

### 8.6.3 Assessment

The UCAF concludes that traffic flow and composition is not forecast to change significantly on local roads because of the Scheme.

The volume of traffic (measured in terms of total daily vehicle-kilometres) in Greenwich, Tower Hamlets and Newham is forecast to decrease in all time periods, with the exception of Tower Hamlets in the evening peak (an increase of three per cent) and Newham in the morning peak (an increase of less than one per cent). These increases mostly occur on strategic routes (for example the A12) that are forecast to become more attractive to drivers due to a reduction in congestion on the Blackwall Tunnel approaches.

<sup>78</sup> [TfL \(July 2018\), Vision Zero Action Plan](#)

Traffic on some local roads such as Chrisp Street, Manor Road and Abbott Road is conversely forecast to decrease. In most time periods there is little change in the average speed of traffic, with the exception of an increase from 21kph to 24kph in the morning peak in Greenwich and an increase from 17kph to 19kph in the evening peak in Tower Hamlets. As with the changes in traffic flow, this is primarily caused by improved conditions on strategic routes in these boroughs linked to a reduction in queuing on the Blackwall Tunnel approaches.

People from more deprived areas, some ethnic minorities, disabled people, children and older people are disproportionately affected by road danger. However, no impacts on road safety due to changes in traffic levels on local roads resultant of the scheme have been identified.

## 8.7 Social Capital

### 8.7.1 Introduction

Changes to social capital (defined as including social links, networks, participation and satisfaction with living in an area) as a result of the proposed user charges may result from severance as well as changes to the amenity of the area for local residents (for example from changes in noise and air quality).

Some networks extend over the river, whether for the purposes of visiting family and friends, for shopping or leisure and recreation. The Silvertown Tunnel provides a new link across the Thames improving connectivity to north and south of the River Thames in east London and giving access to a wider catchment of services and facilities including education, retail, leisure, healthcare, places of worship and open space.

### 8.7.2 Summary

Table 51 summarises the overall equality impacts of the proposed user charges on Social Capital.

**Table 51: Social Capital Summary**

<b>Summary</b>	<p>People on low incomes may experience a differential impact as a result of a reduced ability to afford the user charges and associated change in travel patterns and social networks created. However, the various discounts and exemptions proposed alongside support measure provided through the green and fair package of concessions and discounts help to ensure social capital is not negatively impacted due to the proposed user charges, when factored alongside the improvements to cross-river journey times. The improvements to bus journey times and introduction of new services are also considered to help ensure there are no disproportionate or differential negative impacts on social capital. This helps to ensure protected characteristic and disadvantaged groups are not lawfully discriminated against,</p>
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	<p>advance equality of opportunity, and help to foster good relations between people.</p> <p>There is a risk that the user charge could have a negative impact on carers and the provision of care cross-river by informal, voluntary, paid care workers and PAs. Whilst we believe that our proposed support options help to mitigate these potential impacts from occurring, it is important that we monitor whether any negative impacts arise and explore options to mitigate these in line with Policy 15 of the CPAP.</p> <p>No overall significant changes to amenity for local residents due to changes in traffic levels leading to significant changes in noise and air quality, or severance are anticipated.</p> <p>It is considered that due regard has been given to Section 149(1) of the Equality Act 2010, and no overall disproportionate or differential impacts on social capital have been identified for protected characteristic and disadvantaged groups.</p>
<b>Overall rating of impact</b>	Neutral
<b>Overall Impacts identified for protected characteristic and disadvantaged groups</b>	N/a
<b>Mitigations required</b>	N/a

### 8.7.3 Assessment

The proposed user charges have been developed to ensure that journey times are improved cross-river and that negative impacts of induced demand do not occur. They aim to encourage people who are able to do so to re-route their journey, re-mode to alternative active or sustainable modes, or re-time their journey to out of peak periods. However, consideration has also been given to ensuring that they do not act as a barrier to travel for people requiring use of the tunnel, and do not lead to negative socio-economic outcomes. These factors have been assessed through the UCAF.

It is considered that people are likely to continue to make cross-river journeys to access social links and networks, despite the user charge. Shifts in travel patterns and behaviour may occur, for example during off-peak periods or shifting to the bus network, which is improved through new and improved routes benefitting from reduced journey times and



service reliability, with a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

As highlighted in Section 8.2.6, there is a risk that the user charges may lead to a potential impact on access to work and training for carers (voluntary, paid, informal and PAs) and care providers providing services cross-river. If this impact were to affect the provision of care, it could lead to negative impacts on social capital for people who may be reliant on care including social links, networks, participation, and satisfaction with living in an area for disabled people and older people.

Whilst we believe that our proposed discounts and exemptions will help to mitigate negative impacts on the provision of care whilst ensuring we achieve our project objectives, it is important that we monitor how the scheme is affecting cross-river care provision and ensure we seek to address these impacts should they have a negative impact on protected characteristic and disadvantaged groups. In line with Policy 15 of the CPAP, we will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening.

Additionally, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended that we provide targeted communications to carers to raise awareness of the discounts and exemptions they or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan.

People on low incomes may experience a differential impact as a result of a reduced ability to afford the user charges and associated change in travel patterns and social networks created. However, the provision of new and improved bus routes through the tunnel together with improvements to journey times and reliability will help to offset this. Furthermore, the east London low-income residents' discount has been proposed, helping to further offset the impact.

As part of the green and fair package of concessions and discounts we are also providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free cross-river bus journeys to support local residents, free DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents and a cross-river cycle shuttle-bus, free for at least 12 months. The bus and DLR concessions proposed as part of the green and fair package of concessions and discounts could have a greater positive impact for people on low incomes, whose most common mode of travel in London is bus, compared to people not on low incomes.

The UCAF has concluded that the Scheme is not forecast to cause any significant impacts on air quality and noise on local roads, and it is therefore considered that the Scheme will not lead to a negative impact on amenity for protected characteristic and disadvantaged groups.

As demonstrated in the UCAF, the proposed user charges are not anticipated to lead to significant increases in traffic levels leading to severance which impacts protected characteristic and disadvantaged groups. Furthermore, cross-river severance is considered to be improved due to the improvements in connectivity resultant of the

improved journey times when travelling through the tunnels by all modes able to use the tunnels, and the location of the northern portal of Silvertown Tunnel providing direct access to the Royal Docks. This includes the new and improved bus routes which will benefit from the reductions in congestion.

The discounts and exemptions provided as part of the scheme as shown in Table 3 help to minimise the impact on social capital resultant of severance caused by the proposed user charges.

There is a risk that social capital may be negatively impacted for disabled people and older people if a negative impact on cross-river care were to arise. Whilst we believe our proposals will not lead to a negative impact on the provision of care cross-river, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended that we provide targeted communications to carers to raise awareness of the discounts and exemptions they or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan. We will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening.

The impact of the proposed user charges on social capital is neutral. The proposed charge levels, alongside the proposed discounts and exemptions and improvements to cross-river connectivity, journey times and reliability help to ensure protected characteristic and disadvantaged groups are not lawfully discriminated against, advance equality of opportunity, and help to foster good relations between people who share a protected characteristic and those who do not.

## 9 Monitoring and Evaluation

It is a requirement of the DCO that we monitor the impacts of the proposed user charges in line with the Monitoring and Mitigation Strategy following the opening of the Silvertown Tunnel.

If it is discovered during this monitoring that the proposed user charges are not supporting the scheme to achieve against the Project Objectives, we will review and vary the proposed user charges to ensure they allow for the Project Objectives to be achieved.

In line with Policy 15 of the CPAP, we will review our user charges no later than 15 months after the Silvertown Tunnel opens, and make changes to the user charges where this is required for us to meet our Project Objectives or to mitigate any negative impacts on protected characteristic or disadvantaged groups. Any amendments to the proposed user charges will be subject to assessment of impacts via the UCAF and a further EqIA to ensure that the changes either mitigate against, or do not lead to, disproportionate or differential negative impacts on Protected characteristic and disadvantaged Groups in line with the PSED of the Equality Act 2010.

# 10 Conclusion

Overall, the impacts which have been identified in this assessment are considered to be minor requiring no further mitigations, or mitigated through the proposed discounts, exemptions and concessions proposed.

A potential disproportionate negative impact has been identified for PHV drivers on low incomes who do not own a ZEC or wheelchair accessible PHV. Due to the demographics of drivers in the PHV industry, this could have a potential secondary disproportionate impact on people of Asian ethnicity and Muslims. However, this impact is expected to diminish over time as vehicles are upgraded to ZEC vehicles to meet licensing requirements.

There is a risk that the user charges may impact on access to work and training for carers (voluntary, paid, informal and PAs) and care providers providing services cross-river. If this impact were to affect the provision of care, it could lead to negative impacts on social capital for people who may be reliant on care including social links, networks, participation, and satisfaction with living in an area for disabled people and older people. Changes to the provision of care by the voluntary and charitable sectors could negatively impact disabled people, older people, homeless people, and asylum seekers and refugees.

The proposed discounts and exemptions will help to mitigate negative impacts on the provision of care whilst ensuring we achieve our project objectives; however, it is important that we monitor how the scheme is affecting cross-river care provision and ensure we seek to address these impacts should they have a negative impact on protected characteristic and disadvantaged groups. In line with Policy 15 of the CPAP, we will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening.

Additionally, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended that we provide targeted communications to carers to raise awareness of the discounts and exemptions they or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan. The marketing plan is being prepared at the time of writing of this document and is intended to be launched in early 2025 subject to approval of the proposed user charges by the TfL Board.

People on low incomes may disproportionately experience a reduced ability to afford the user charges and associated change in travel patterns and social networks created. However, the east London low-income residents' discount has been proposed, helping to offset the impact.

Further mitigations provided as part of the Scheme which help to offset potential negative impacts include the improvements to the bus network through improved journey times on existing routes and two new cross-river routes, with a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

As part of the green and fair package of concessions and discounts we are also providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London.

This includes bus concessions for free cross-river bus journeys to support local residents, a free cross-river cycle shuttle-bus and free DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V. Additionally, for at least 12 months following Scheme opening small businesses, sole traders and charities in host boroughs will benefit from a £1 discount on the standard off-peak charges (subject to eligibility). Furthermore, TfL assisted travel and travel mentoring programmes and standard concessions on buses and public transport usage for certain groups help to ensure that alternative modes are as accessible as possible.

It is considered that the proposed user charges (including the discounts and exemptions) have been developed with due regard for the impact on protected characteristic groups, and we have satisfied our obligations under Section 149(1) of the Equality Act 2010 in developing the proposals.

## Appendix 6

### Discounts, exemptions and reimbursements for the Silvertown and Blackwall tunnels user charges

Discounts, exemptions and reimbursements	Eligibility Criteria
<b>50 per cent Discount</b>	
East London low-income residents' discount (for a period of at least three years)	To qualify individuals must live within an east London borough <sup>1</sup> and be in receipt of certain benefits <sup>2</sup> .
<b>£1 discount business discount on standard off-peak charges</b>	
Business discount (for a period of at least 12 months)	Eligible small businesses, sole traders and charities based in the host boroughs can register a maximum of three vehicles to receive a £1 discount on off-peak charges.
<b>100 per cent Discount</b>	
Recovery and breakdown vehicles	This discount applies to recovery and breakdown vehicles operated by organisations in the European Economic Area that are accredited to BS EN ISO9001:2008 (and in accordance with the specification for applying that standard to the industry).
Vehicles with 9+ seats	This discount applies to vehicles with nine seats or more (vehicles registered with the DVLA as a minibus, bus or coach will automatically receive a discount and will not need to apply for the discount).
Blue Badge holders	This discount applies to individuals who hold a valid Blue Badge in the European Economic Area. Individuals can register up to two vehicles that would be used to travel through Silvertown or Blackwall Tunnels. This could be their own vehicle, or one they travel in.
Certain operational vehicles	This discount applies to qualifying organisations that operate vehicles performing certain essential public services including certain services provided by the host boroughs <sup>3</sup> . Eligibility is determined by TfL.

<sup>1</sup> London Borough (LB) Barking & Dagenham, LB Bexley, LB Bromley, City of London Corporation, Royal Borough (RB) Greenwich, LB Hackney, LB Havering, LB Lewisham, LB Newham, LB Redbridge, LB Southwark, LB Tower Hamlets, LB Waltham Forest.

<sup>2</sup> Carer's Allowance, Child Tax Credit, Housing Benefit, Income-related Employment & Support Allowance, Income-based Jobseekers Allowance, Income Support, Universal Credit, State Pension Credit, Working Tax Credit

<sup>3</sup> LB Newham, LB Tower Hamlets and RB Greenwich

Waste collection and waste disposal vehicles used by east London boroughs <sup>4</sup>	This discount applies to vehicles being used by east London boroughs to provide waste collection and disposal services. Eligibility is determined by TfL.
Zero-Emission Capable and Wheelchair Accessible private hire vehicles (PHVs)	This discount applies to PHVs designated as wheelchair-accessible vehicles or zero emission capable as long as they are fulfilling a private hire booking and are licensed with London Taxi and Private Hire.
<b>Exemptions</b>	
Taxis	This exemption applies to taxis which are licensed with London Taxi and Private Hire.
Emergency services vehicles exempt from vehicle tax	This exemption applies to emergency service vehicles which are exempt from vehicle tax including ambulances, police vehicles and fire engines.
NHS vehicles exempt from vehicle tax	This exemption applies to NHS vehicles that are exempt from vehicle tax.
Vehicles in the disabled tax class	This exemption applies to vehicles used by disabled people that are exempt from vehicle tax.
Military vehicles in use	This exemption applies to vehicles currently used by the armed forces including visiting services or international organisations.
<b>Reimbursements<sup>5</sup></b>	
NHS Patient Reimbursement <sup>6</sup>	<p>NHS patients are eligible for reimbursement if:</p> <ol style="list-style-type: none"> <li>1. Clinically assessed as too ill, weak or disabled to travel to an appointment on public transport, and any of following apply: <ul style="list-style-type: none"> <li>• Have a compromised immune system (problems with your immune system)</li> <li>• Require regular therapy or assessment</li> <li>• Require recurrent surgical intervention</li> </ul> </li> </ol> <p>OR</p> <ol style="list-style-type: none"> <li>2. During an epidemic or pandemic prevalent in Greater London, are clinically assessed as</li> </ol>

<sup>4</sup> East London boroughs are those listed in footnote 1 above.

<sup>5</sup> Before making a claim for reimbursement, the user charge must be paid on or before the day of your journey, or the vehicle used for the journey must be registered for a TfL Auto Pay account.

<sup>6</sup> The NHS trust or hospital must be registered with TfL for the reimbursement scheme. Any refund request should be made through the NHS trust or hospital as they manage the reimbursement process, not TfL.

	being too vulnerable to infection to travel to an appointment on public transport.
NHS Staff Reimbursement	<p>NHS staff members, are eligible for reimbursement if any of the following criteria is met:</p> <ol style="list-style-type: none"> <li>1. Those using their vehicles to carry any of the following: <ul style="list-style-type: none"> <li>• Bulky, heavy or fragile equipment/supplies</li> <li>• Patients' notes or other confidential material</li> <li>• Controlled drugs</li> <li>• Clinical waste, contaminated sharps, radioactive materials or non-medicinal poisons</li> <li>• Prescription-only medicines or waste medicinal products</li> <li>• Clinical specimens, body fluids, tissues or organs</li> </ul> </li> </ol> <p>OR</p> <ol style="list-style-type: none"> <li>2. Those responding to an emergency or other extraordinary circumstances when on call.</li> </ol>

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**Board**



**Date:** 4 December 2024

**Item:** Travel in London 2024 Annual Overview Report

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**This paper will be considered in public**

## **1 Summary**

- 1.1 The purpose of this paper is to present the Travel in London 2024 Annual overview report, included at Appendix 1. The final overview report will be published on the TfL website a few days after this meeting of the Board.

## **2 Recommendation**

- 2.1 **The Board is asked to note the Travel in London 2024 Annual overview report.**

## **3 Background**

- 3.1 Travel in London is our annual publication that summarises trends and developments relating to travel and transport in London. Its principal function is to describe how travel is changing and to provide an overview of progress towards implementing the Mayor's Transport Strategy. It also provides an evidence and analysis base for the general use of stakeholders and policymakers.
- 3.2 In 2023, the structure of these reports was revised to include a separate Annual Overview report, published towards the end of each calendar year, and a series of Update and Focus reports, covering specific topics in greater depth, published throughout the year as data become available.
- 3.3 The overview report also provides an evidence and analysis base for the general use of stakeholders and policymakers.
- 3.4 The overview report sets out data, analysis and commentary on:
- (a) how travel in London is recovering from the coronavirus pandemic and the lasting legacies continuing to affect travel demand across the modes;
  - (b) progress towards our key transport aims, including how the pandemic has affected progress;
  - (c) consolidated estimates of travel demand and mode shares in 2023;
  - (d) active travel and the pandemic, including a 26 per cent increase in cycling between 2019 and 2024;
  - (e) trends in travel behaviour among London residents, including hybrid working;

- (f) key trends for public transport and road traffic in London;
- (g) improving London's air quality and reducing our CO<sub>2</sub> emissions; and
- (h) supporting new homes and jobs and new transport infrastructure for London.

**List of appendices to this report:**

Appendix 1: Travel in London 2024 Annual overview report

**List of Background Papers:**

Mayor's Transport Strategy Tracker Dataset (electronic file)

Datasets underlying graphics presented in the report (electronic file)

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December 2024

# Travel in London 2024

## Annual overview

TfL Board meeting 4 December 2024

MAYOR OF LONDON



**TRANSPORT  
FOR LONDON**  
EVERY JOURNEY MATTERS

# Travel in London 2024

## Annual overview

### TfL Board meeting 4 December 2024

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## Table of contents

Introduction .....	5
2023-2024: an overview .....	5
Monitoring progress towards the Mayor's Transport Strategy .....	8
<b>Overall travel demand and mode shares.....</b>	<b>10</b>
Recent travel demand trends and the pandemic recovery .....	10
Recent modal demand trends.....	11
Active, efficient and sustainable mode share .....	11
Trends in the principal drivers of travel demand.....	12
London's population.....	12
London's economy.....	13
<b>The travel behaviour of London residents.....</b>	<b>15</b>
Trip rates and trip lengths .....	15
Mode shares for London residents' travel .....	16
Hybrid working.....	17
<b>Healthy streets and healthy people .....</b>	<b>19</b>
<b>Active travel.....</b>	<b>19</b>
Physical activity and travel.....	19
<b>Cycling .....</b>	<b>20</b>
Overall trends in cycling .....	20
Santander Cycles.....	21
Access to London's Cycleway network.....	22
<b>Walking .....</b>	<b>23</b>
Walking by London residents .....	23
Pedestrian activity in central London .....	23
<b>Reducing road danger .....</b>	<b>24</b>
Vision Zero.....	24
Trend in casualties to 2023.....	24
Casualties involving TfL buses.....	25
<b>Air quality .....</b>	<b>26</b>
The Ultra Low Emission Zone.....	26
Compliance with the requirements of the scheme.....	27
Emissions of atmospheric pollutants from road vehicles.....	28
Pollutant concentrations.....	30
Overall trend in ambient concentrations of nitrogen dioxide (NO <sub>2</sub> ) .....	31
<b>Carbon net zero 2030 .....</b>	<b>32</b>
Overall trend in carbon dioxide (CO <sub>2</sub> ) emissions from transport .....	32
Components of London's transport carbon dioxide equivalent (CO <sub>2</sub> e) emissions.....	33
Carbon dioxide equivalent (CO <sub>2</sub> e) emissions per passenger kilometre on TfL services .....	33
Electrifying the road vehicle fleet .....	34
Take-up of electric vehicles .....	34

Provision of electric vehicle charging infrastructure .....	35
Zero-emission bus and taxi fleets .....	37
<b>Road traffic.....</b>	<b>38</b>
Overall trends in road traffic.....	38
Freight vehicles entering central London in the weekday morning peak.....	40
Road traffic congestion .....	40
<b>A good public transport experience .....</b>	<b>42</b>
<b>Public transport demand and operational performance trends.....</b>	<b>42</b>
Post-pandemic recovery to the 2023/24 financial year by mode.....	43
Changes in the distribution of travel demand throughout the week and the day .....	44
Service provision and operational performance.....	46
<b>Connectivity .....</b>	<b>47</b>
Access to bus services .....	47
Public transport access level (PTAL).....	47
<b>Public transport safety.....</b>	<b>48</b>
Customer and workforce injuries.....	48
<b>Customer Care .....</b>	<b>50</b>
Physical accessibility .....	51
Bus speeds.....	51
Public transport crowding.....	52
Superloop .....	53
<b>New homes and jobs .....</b>	<b>55</b>
The Elizabeth line.....	55
Silvertown tunnel.....	56
London Overground extension to Barking Riverside .....	57
<b>Opportunity Areas .....</b>	<b>57</b>
Public transport access level (PTAL) in Opportunity Areas.....	57
Mode shares in Opportunity Areas .....	59
Housing delivery in Opportunity Areas .....	60
Places for London.....	60
<b>Other reports in the Travel in London 2024 series.....</b>	<b>62</b>
<b>About Transport for London (TfL) .....</b>	<b>63</b>

## Introduction

Travel in London is Transport for London's (TfL's) annual publication that summarises trends and developments relating to travel and transport in London. Its principal function is to describe how travel is changing and to provide an overview of progress towards implementing the Mayor's Transport Strategy (MTS). It also provides an evidence and analysis base for the general use of stakeholders and policymakers.

In 2023, the structure of these reports was revised to include a separate Annual Overview report, published towards the end of each calendar year, and a series of Update and Focus reports, covering specific topics in greater depth, published throughout the year as data become available.

This Annual Overview report covers trends and developments up to 2023 and into 2024, including historical series and, more recently, reflecting the disruption brought about by the coronavirus pandemic from early 2020 and London's subsequent recovery. The report is broadly structured around the Mayor of London's key aims for transport as set out in the Mayor's Transport Strategy.

For more information about any of the items featured in this report please contact [TiLEnquiries@tfl.gov.uk](mailto:TiLEnquiries@tfl.gov.uk).

### 2023-2024: an overview

During 2023 and into 2024 the travel demand recovery in London following the coronavirus pandemic continued and, in late 2024, achieved what appear to be broadly settled conditions. In 2023, overall average travel demand (across all modes) was 95 per cent of the 2019 pre-pandemic baseline (90 per cent in 2022). As well as pandemic-related changes in travel behaviour, such as the more widespread adoption of hybrid working, continuing cost-of-living pressures and increasing operational difficulties affecting some of our networks are thought to be acting as impediments to a fuller recovery.

The pace, extent and nature of the recovery has lagged previous expectations, and this is impacting upon progress with some of our key transport goals. Nevertheless, the year saw significant progress in several areas:

- Perhaps most noteworthy was the successful extension of the Ultra Low Emission Zone (ULEZ) to outer London. The combined zone now covers the whole of Greater London and is delivering substantial improvements to the cleanliness of the air that Londoners breathe.
- Active travel continues to consolidate a positive post-pandemic legacy, with five per cent more cycle journeys in 2024 than in 2023, and 26 per cent more than 2019 overall.
- The Elizabeth line continues to deliver transformative public transport capacity benefits, carrying an average of 660,000 journeys per day as of July 2024.
- There was also progress against our Vision Zero targets to reduce and eliminate road danger, with six per cent fewer people tragically killed or seriously injured on London's roads in 2023 compared to 2022. This is a reduction of 24 per cent against the 2010-14 baseline.

The active, efficient and sustainable mode share for all travel in London for 2023 was 63.2 per cent, one percentage point higher than in 2022 (62.2 per cent), but still below the pre-pandemic baseline of 63.6 per cent in 2019.

London's population in 2023 was estimated to be 8.9 million, 1.6 per cent higher than in 2021, and nine per cent higher than in 2011. The changing structure of London's population, notably a shift towards an older average age, could also have longer-term implications for travel demand, given the different travel behaviour of different age groups.

Meanwhile, London's economic recovery since the pandemic has been relatively slow, albeit with some positive indicators beginning to emerge such as a particularly strong bounce back in workforce jobs, up by 11 per cent since 2019. However, the future economic outlook remains uncertain.

Considering the post-pandemic demand recovery on public transport in greater detail (in terms of journey stages), during 2023/24:

- Overall bus demand was 89 per cent of the pre-pandemic baseline.
- Overall London Underground demand was 88 per cent of the pre-pandemic baseline.
- Demand on DLR and London Trams was 85 and 73 per cent of the pre-pandemic baseline, respectively, with asset-related failures thought to be a significant contributor to the latter.
- Demand on the IFS Cloud Cable Car and London River Services, however, was 131 and 100 per cent of the pre-pandemic baseline, respectively.
- Overall demand on the London Overground was 97 per cent of the pre-pandemic baseline, showing a stronger relative recovery.
- Finally, the Elizabeth line became established as a major part of London's public transport network, carrying an average of approximately 660,000 journeys per day (seven-day week average) in July 2024.

Particularly on the London Underground, the concentration of commuter demand on certain days of the week (Tuesday to Thursday) remained a significant feature, although to a lesser extent than in 2022/23.

During 2023/24, the operational performance and reliability of London's public transport networks continued to recover from the impacts of the pandemic. However, this recovery to pre-pandemic performance norms was held back by, on the rail networks, a combination of asset- and industrial action related causes; and on the bus network, increasing traffic congestion.

Average bus speeds in London during 2023/24 were 9.3 miles per hour, a marginal one per cent reduction on 2022/23, despite strenuous efforts to improve this.

Public transport crowding, however, remained below the pre-pandemic norm, with the proportion of passenger kilometres travelled in 'crowded' conditions (defined as standing densities exceeding two people per square metre) at 1.9 per cent in 2023, compared to 8.9 per cent in 2019. The new capacity created by the Elizabeth line would have contributed substantially to this trend, but it also reflects changed patterns of travel throughout the day.

Our London Travel Demand Survey (LTDS) suggests that trip rates (the average number of trips undertaken per person on an average day across a seven-day week) continued to edge slowly downwards, with an average of 1.98 trips in 2023/24 compared to 2.07 in 2022/23 and 2.21 in 2019/20. Although this long-term trend has also been seen nationally,



more recent declines in London have been at a faster pace, and the latest reduction contrasts with a six per cent increase nationally.

Some 47 per cent of London resident workers can now work from home on either a permanent, regular or occasional basis compared to 30 per cent in 2019/20. Although not all take advantage of this there is now little doubt that greater hybrid working has become more embedded since the pandemic.

In 2023/24, 35 per cent of London residents achieved the Mayor's active travel target of 20 minutes per day spent either walking or cycling, but the value for this measure remains below the pre-pandemic (2019/20) average of 42 per cent. The ongoing relative shortfall in public transport demand also remains the major factor holding back progress with this measure, since public transport trips usually involve an active travel stage, for example walking to and from the station. Although there have been sustained increases in both walking and cycling since the pandemic, the LTDS indicates that walking among London residents in 2023/24 fell back significantly from the post-pandemic high seen in 2022/23.

In 2024 there were an estimated 1.33 million daily cycle stages across London, up by 5 per cent from 1.26 million in 2023 and by 26 per cent from 1.05 million in 2019. By October 2024, the strategic cycle network had grown to more than 400 kilometres, compared to 90km in 2016 and reaching 27.4 per cent of Londoners who live within 400 metres of it (up from 24.2 per cent in 2023 and five per cent in 2016). However, in 2023 demand on Santander Cycles dropped by 26 per cent following a sharp decrease in the number of hires by casual users. This reflects the impact of some changes to the fare system in late 2022 and the increased competition from dockless cycle hire schemes in London, both of which are being mitigated through improvements to the Santander Cycles offer.

The slowing overall pace of post-pandemic recovery was also reflected in pedestrian activity in central London. In the first two quarters of 2024 the number of pedestrians observed across an extensive sample of sites was 90 per cent of the equivalent pre-pandemic baseline, continuing what now appears to be an established pattern and broadly mirroring the relative shortfall in London Underground demand.

The year 2023 also saw the successful expansion of the Ultra Low Emission Zone (ULEZ) to outer London, completing a process begun in 2017. The ULEZ policies mean that a larger proportion of vehicles in London are cleaner than they would otherwise be. As of early 2024, over 96 per cent of vehicles seen driving in the London-wide ULEZ met the required emissions standards.

A cleaner fleet means lower emissions from cars and vans. This means that people in London are breathing cleaner air. Nitrogen oxide (NO<sub>x</sub>) emissions from cars and vans in outer London were estimated to be 13 and 7 per cent lower, respectively, in 2023 than would have been expected without the London-wide ULEZ, equating to savings of 424 tonnes. Fine particulate matter (PM<sub>2.5</sub>) exhaust emissions from cars and vans are estimated to be 20 per cent lower in outer London.

The combined impact of all phases of the ULEZ has contributed to greater overall air quality improvements across London. Average concentrations of harmful nitrogen dioxide (NO<sub>2</sub>) concentrations at roadside locations across London are estimated to be 23 per cent lower on average than they would have been without the ULEZ and its expansions, with even greater improvements in central and inner London where the ULEZ operated earlier. Areas outside London are also seeing the benefits of ULEZ policies, as roadside NO<sub>2</sub> concentrations within 5 kilometres of the Greater London

boundary were on average nine per cent lower in 2023 than in an estimated 'no ULEZ' scenario.

London's transport CO<sub>2</sub> emissions increased in 2022 by three per cent over 2021, reflecting the post-pandemic recovery in travel. Provisional forecasts for 2023 suggest a reduction against 2022 of four per cent. While we are broadly on track to meet the original 2050 ambition, urgent and large-scale action at all levels of Government is needed to meet the accelerated 2030 target.

The total number of electric vehicles (all classes) in London reached 205,000 in quarter 2 2024 (April to June), having risen from 192,400 in quarter 1 2024 (January to March) and 179,300 in quarter 4 2023 (October to December). There were 128,400 battery electric vehicles (BEV) in quarter 2 2024 (April to June), including 116,560 cars and 5,590 vans. Plug-in hybrid electric (PHEV) and range-extended electric vehicles (REEV) totalled 76,550.

In October 2024, there were 21,658 public electric vehicle charging points in London, around one third of all public charging points in the UK, which is a 427 per cent increase in charging infrastructure since April 2020. Despite this continuing progress, the distribution of public charging points exceeding 50kW across London is uneven. Although London averages 234 devices per 100,000 people compared to the UK average of 95.6, the boroughs range from around 30 up to 1,437 devices per 100,000 people, with a clear bias towards inner-west London, showing the scope for improvement.

In 2023, 3,710 people were killed or seriously injured on London's roads, the lowest figure outside the pandemic-affected years, and a six per cent reduction on 2022 (3,961). Overall, 26,176 people were injured on London's roads (all severities), a four per cent reduction from 2022 (22,207). The 2023 modal make-up of people killed or seriously injured was similar to previous years, with 80 per cent being pedestrians, cyclists or motorcyclists.

In 2023 there were no reportable bus occupant (passengers and drivers) fatalities for the first time since 2014, and 33 per cent fewer people were killed or seriously injured on a London bus against the 2010-14 baseline (from 180 to 121). In 2023 there were 137 people killed or seriously injured in collisions involving a bus on London's roads (including six fatalities). This was a 30 per cent decrease against the 2010-14 baseline, but a four per cent increase on 2022.

Overall road traffic levels in 2023 increased by 0.6 per cent over 2022 but remained five per cent below the pre-pandemic baseline (2019). This compares to a two per cent increase nationally, with traffic levels just two per cent lower than in 2019.

## **Monitoring progress towards the Mayor's Transport Strategy**

Travel in London reports are the principal means of tracking progress towards the aims of the Mayor's Transport Strategy. In this strategy and subsequent documents, the Mayor identified specific outcomes, each having a quantified ambition for 2041 (table 1).

Progress towards these is monitored using the Mayor's Transport Strategy Tracker dataset, which is published in full alongside this Annual Overview. Progress against individual goals is addressed in the relevant sections below.

Table I Mayor's Transport Strategy outcomes and measures.

Outcome	Measure	2041 aim
Mode share	Proportion of trips undertaken by active, efficient and sustainable modes	80% of all trips
Active	Proportion of Londoners achieving 20 minutes of active travel per day	70% of Londoners
Safe	Number of people killed or seriously injured on London's roads	Zero
Safe	Number of customers killed or seriously injured on or by a London bus	Zero
Efficient	Number of car trips crossing cordons bounding central, inner and outer London	Three million fewer daily
Green	Average roadside nitrogen dioxide (NO <sub>2</sub> ) concentration in central, inner and outer London	60-70% reduction, 2016 to 2040, equivalent to a 94% emissions reduction
Green	All carbon dioxide (CO <sub>2</sub> ) emissions from London's transport network	72% reduction
Connected	Proportion of Londoners living within 400 metres of a bus stop	Assumed maintained at existing high level
Accessible	Additional journey time by step-free routes	50% reduction
Quality	Proportion of TfL rail journeys travelled in standing densities above two people per square metre	10-20% reduction
Quality	Average bus speed (within safety and speed limits)	5-15% improvement
New homes and jobs	Proportion of population living in areas with public transport accessibility level of four or higher	36% for Greater London, 56% for Opportunity Areas (by 2030)

Source: Greater London Authority.

Alongside these specific aims, this Annual Overview report covers the broader scope of the Mayor's Transport Strategy and aspects of other strategies related to it, mainly the London Plan and the London Environment Strategy.

Published alongside this Annual Overview there will be a series of complementary, free-standing reports:

- Update reports, covering:
  - Consolidated estimates of total travel demand and mode shares
  - The travel behaviour of London residents based on the London Travel Demand Survey
  - Active travel trends
  - Trends in public transport demand and operational performance
- Focus reports on:
  - Motorcycle travel trends
  - Car ownership trends

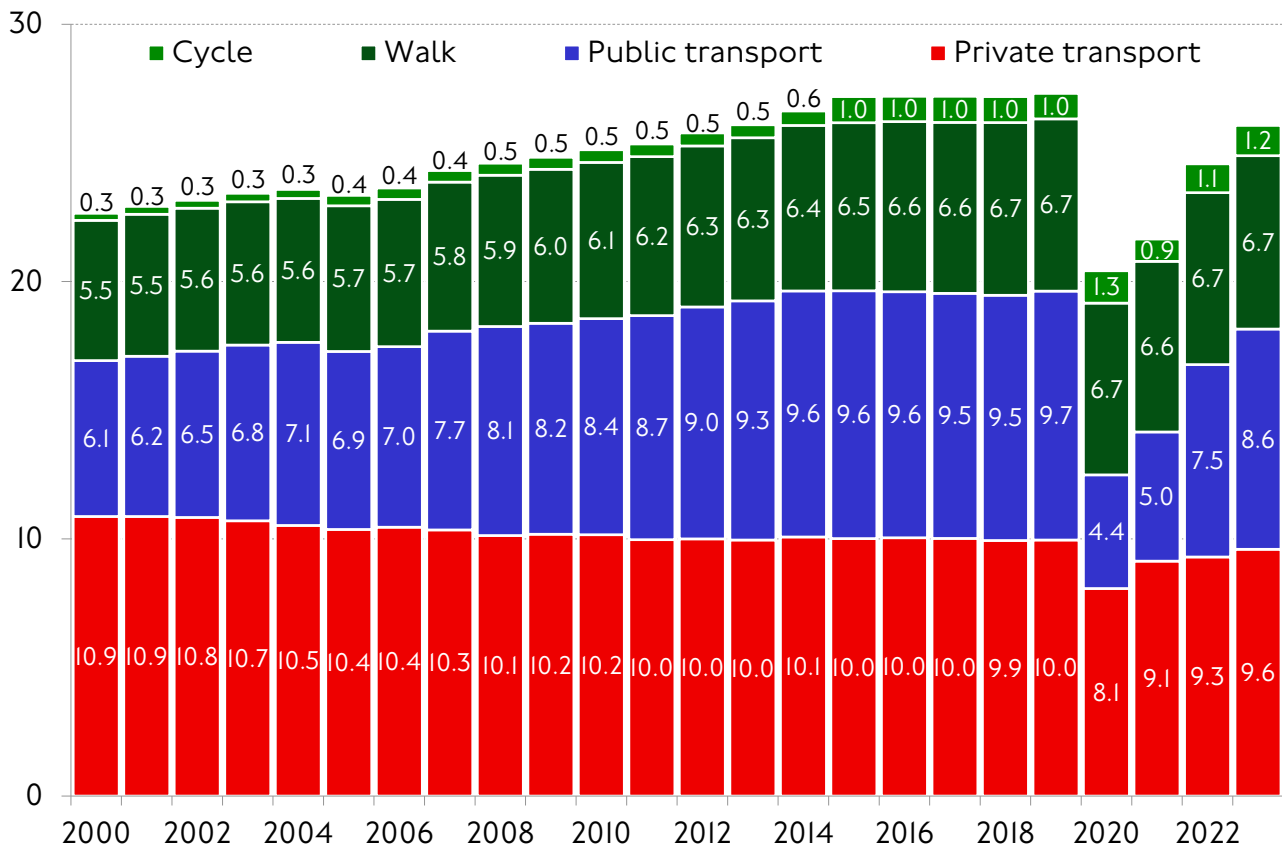
# Overall travel demand and mode shares

## Recent travel demand trends and the pandemic recovery

During 2023 and into 2024, the travel demand recovery in London following the coronavirus pandemic continued and, in late 2024, achieved what appears to be broadly settled conditions. The pace and extent of the recovery have however lagged previous expectations. During 2023, as an annual average, overall travel demand (all modes) was 95 per cent of the pre-pandemic baseline (2019) at 26.1 million trips per day (seven-day week), compared to 27.3 million trips per day in 2019. This was an increase of six per cent on 2022 (figure 1).

As well as pandemic-related changes in travel behaviour such as the more widespread adoption of hybrid working, continuing cost-of-living pressures and increasing operational difficulties affecting some of our networks are acting as impediments to fuller recovery. It should also be recognised that 2023/24 was some four years after the pre-pandemic baseline (2019/20), by which time previous future forecasts to this point would have expected some growth in demand from the baseline level. Demand growth is therefore falling behind the trajectory assumed in the Mayor’s Transport Strategy.

Figure 1 Estimated daily trips (in millions) by mode, seven-day week average, 2000-2023.



Source: TfL Strategic Analysis, Customer & Strategy.

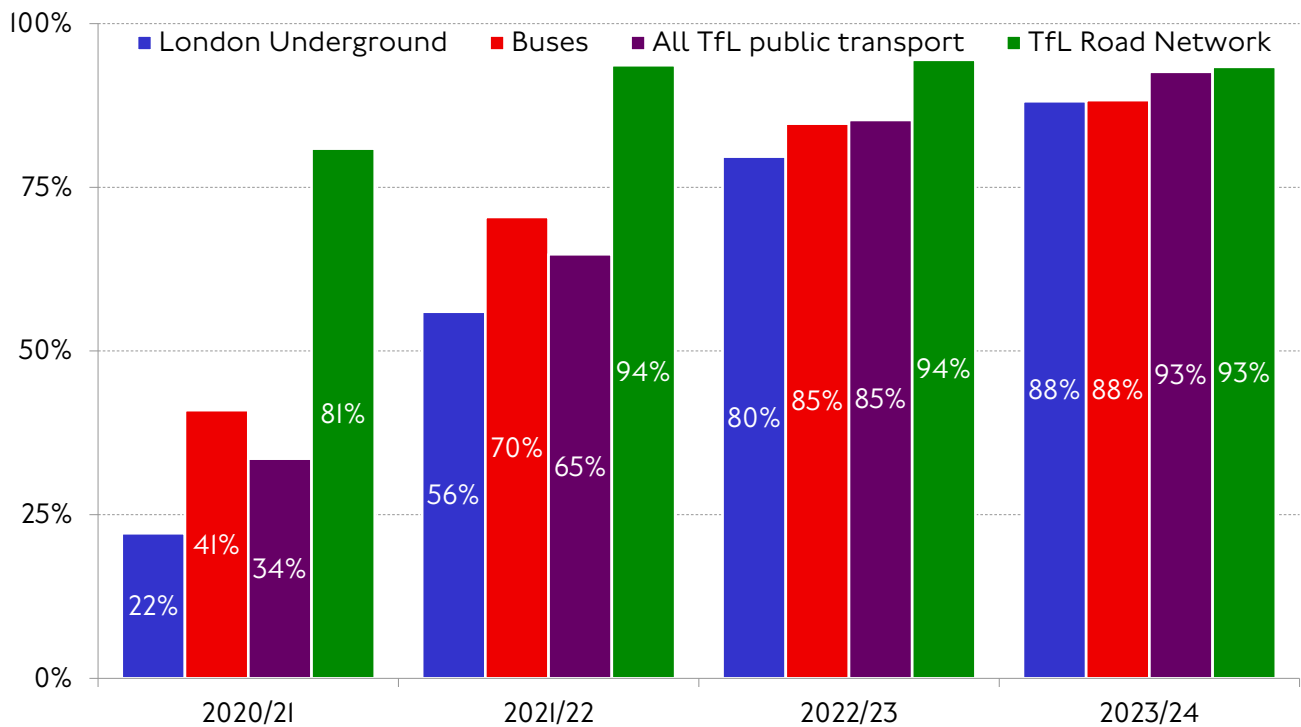
Notes: Trips are complete one-way movements. They may include several modes and journey stages but are classified by the mode that is typically used for the longest distance. Round trips are counted as two trips: an outward and an inward leg.

## Recent modal demand trends

Different recovery patterns have been seen across the main transport modes in London. These reflect features specific to each of the modes, but also elements of the pandemic legacy on everyday life in London.

Figure 2 shows that, as of 2023/24, overall annual public transport demand on TfL-operated modes had recovered to 93 per cent of the 2019/20 pre-pandemic level, with London Underground and buses both at 88 per cent. This is an increase of eight percentage points from the overall public transport recovery value of 85 per cent in 2022/23. The level of traffic recovery on the TfL Road Network in 2023/24 was also 93 per cent, but this level has not changed much since 2021/22, reflecting the fact that road traffic recovered much faster than other modes after the first pandemic restrictions in 2020.

Figure 2 Annual demand (journeys) on the main transport networks compared to the 2019/20 pre-pandemic baseline, 2020/21-2023/24.



Source: TfL Strategic Analysis, Customer & Strategy, based on TfL service performance data.

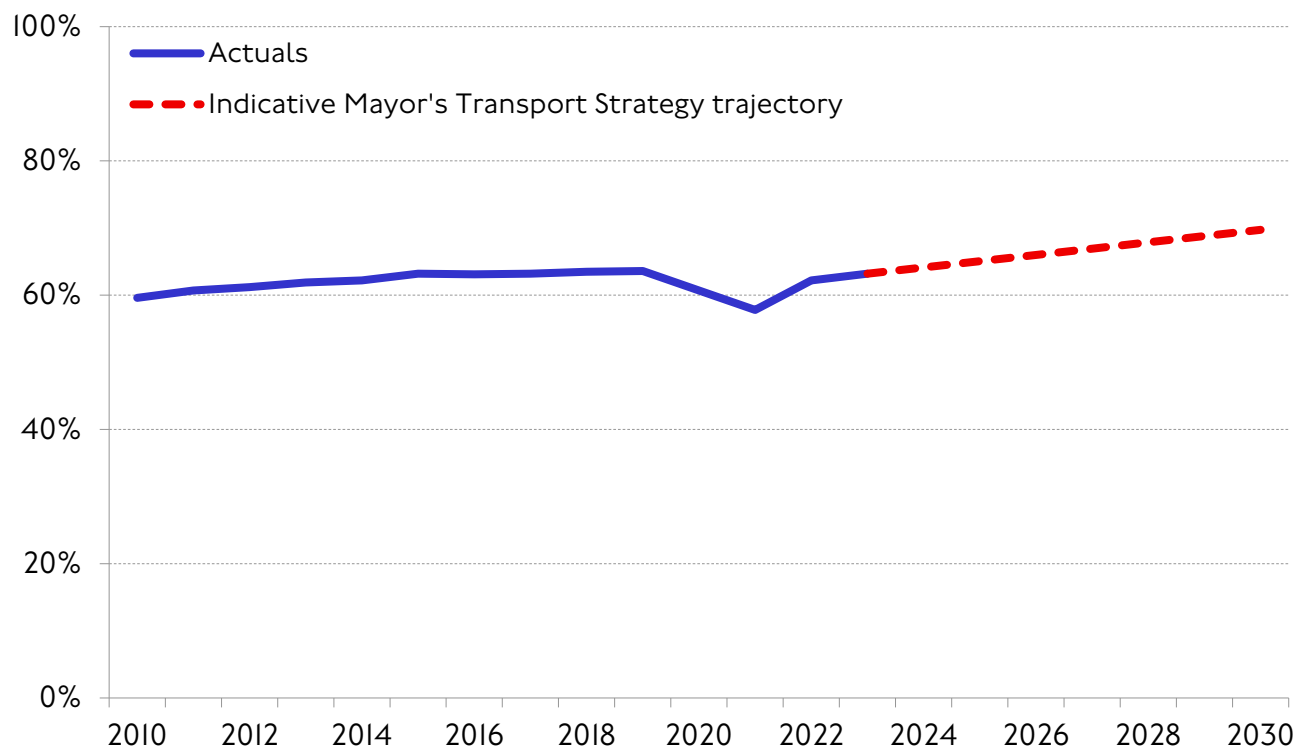
## Active, efficient and sustainable mode share

A central aim of the Mayor's Transport Strategy is to increase the active, efficient and sustainable mode share for all trips in London to 80 per cent by 2041. This will enable us to support growth in the capital's population and economy in a sustainable manner. On average, in 2023 the active, efficient and sustainable mode share for all travel in London was estimated at 63.2 per cent, up from 57.8 per cent in 2021 and 62.2 per cent in 2022, but below our prior expectation for the year. This compares to 63.6 per cent in the last pre-pandemic year (2019). While progress towards this aim before the pandemic was slower than required to meet the target, it is also clear that the pandemic legacy of fewer public transport trips is adversely affecting progress towards this measure.

Figure 3 shows the historic trend in the context of the trajectory required to meet the Mayor’s 2041 aim (shown as a straight line to 2031). Although the recovery from the pandemic is substantially complete, the loss of previously anticipated growth between 2019 and 2023 will increase the required annual change to meet the trajectory in future.

Both walk and cycle mode shares remained higher than before the pandemic, with 26 per cent of all trips in 2023 being walk trips. Cycle mode share was 4.5 per cent in 2023, up from 3.6 per cent in 2019.

**Figure 3** Active, efficient and sustainable trip-based mode share in London, 2010-2030.



Source: TfL Strategic Analysis, Customer & Strategy.

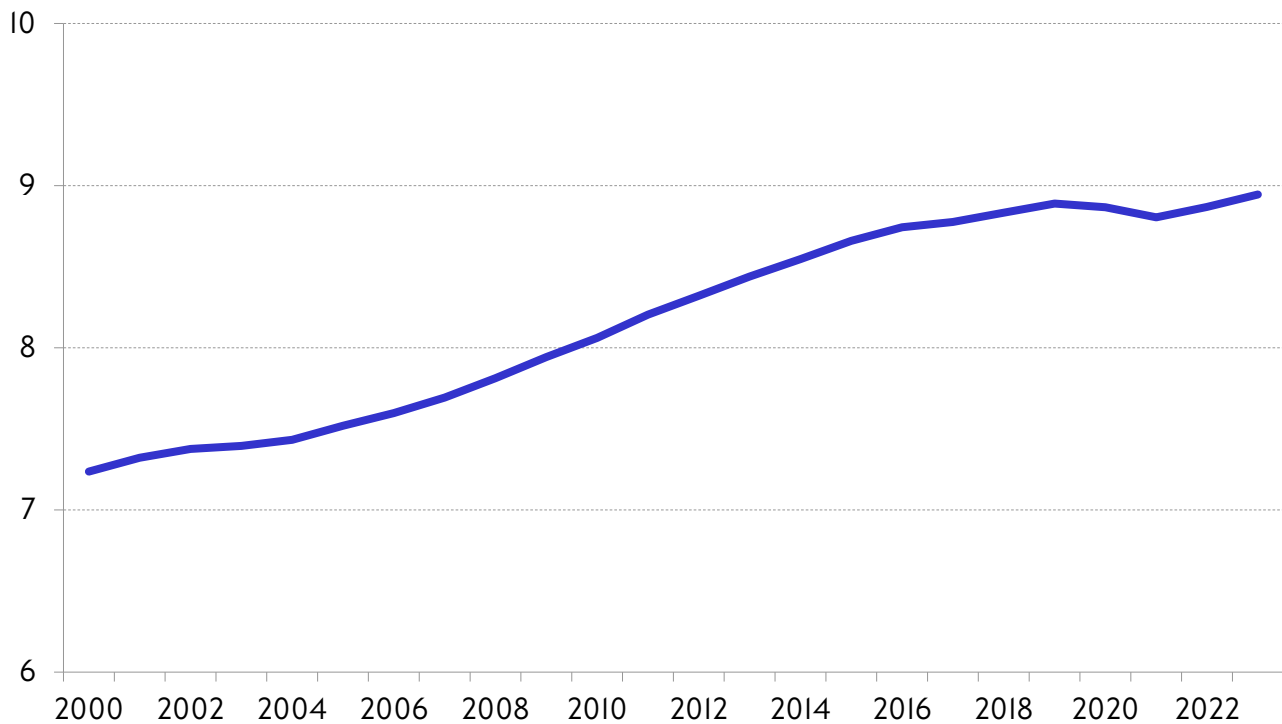
## Trends in the principal drivers of travel demand

Travel demand is primarily a reflection of the number of people living in London and economic activity. Both these underlying drivers have been affected by significant developments during the coronavirus pandemic and in the post-pandemic period.

### London’s population

The latest census of population was conducted across the UK in March 2021, during the latter stages of the pandemic restrictions. The population in London was estimated at 8.9 million (figure 4). Although this was an increase of nine per cent compared with 2011 (8.2 million), this rate of growth was slower than between 2001 and 2011 (12 per cent). This suggests that the rate of population growth may have been relatively overestimated in the latter years of the last decade, which has implications for key indicators such as the active, efficient and sustainable mode share, progress against which was partly predicated on relatively higher population growth resulting in higher densities favouring trips by active, efficient and sustainable modes.

Figure 4 London's population (in millions), 2000-2023.



Source: Office for National Statistics.

After two years of falls in the London population, 2023 marked the second consecutive year of growth, with a 0.9 per cent increase on 2022. However, London's population is just 0.6 per cent higher than in 2019. This growth was mostly due to natural change (accounting for two thirds), with an increase in net international migration almost balanced out by an increase in London residents moving to other parts of the country.

For more information about London's population trends visit the [demography pages](#) on the GLA's website.

### London's economy

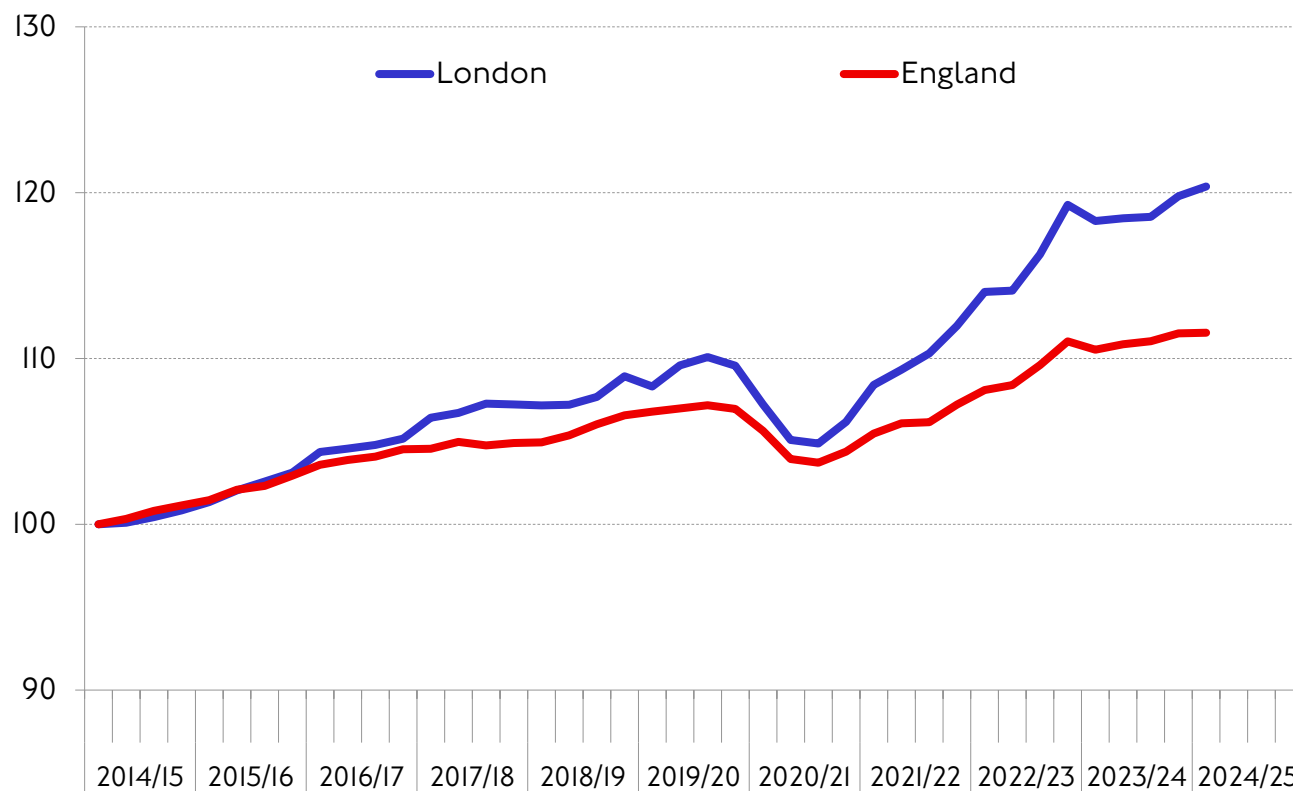
The GLA's [London's economic outlook](#) report forecasts that London's real gross value added (GVA) growth rate will be 1.1 per cent in 2024, as high interest rates and the prolonged cost-of-living crisis drags on the economy. While this growth rate is higher than in 2023 (0.7 per cent) and is expected to pick up slightly in 2025 (1.9 per cent) and 2026 (2.2 per cent), it remains below historic averages.

Growth rates are also slow at the national level, and while inflation has fallen from a peak of 11.1 per cent in October 2022, wage growth continued to lag inflation to mid-2023, although in the year to August 2024 regular pay increased 1.9 per cent in real terms. Restrictive monetary policy to help reduce inflation is resulting in slow economic growth, as households reduce spending while disposable incomes are squeezed.

Provisional estimates from the Office for National Statistics (ONS) show that workforce jobs in London increased by two per cent between the first quarter of 2023/24 and the equivalent quarter in 2024/25 and have increased by 11 per cent since the same quarter in 2019/20 (figure 5). This compares to national figures which show an increase of one and four per cent respectively. However, the GLA forecasts that the rate of growth is likely to slow to 1.0 per cent in 2024 and 1.3 per cent in 2025. The strong growth in workforce jobs in London over the last year has largely been driven by the recovery of jobs in the

arts, entertainment and recreation sector (a year-on-year increase of 26 per cent), and some growth in service sectors including transport and real estate, as well as health and social care.

Figure 5 Change (index: quarter I 2014/15 (Apr-Jun) = 100) in workforce jobs in London and England, by (financial) quarter, quarter I 2014/15 (Apr-Jun)-quarter I 2024/25 (Apr-Jun).



Source: Office for National Statistics.

The ongoing cost-of-living crisis has implications for travel demand. National data on disposable incomes shows that between 2019/20 and 2022/23 median disposable household income has fallen by one per cent. The greatest reduction (10 per cent) is for people aged 35 to 44 and households which are in the top 10 per cent based on disposable income (a reduction of four per cent). Higher-income households tend to travel more frequently and therefore even a slight reduction in travel, for example as these groups may choose to make fewer shopping and leisure trips to adapt to the reduction in disposable income, could influence overall trip rates.

While the fall in disposable incomes is greatest for higher-income households, the squeeze is felt most acutely for lower-income households. The GLA’s monthly [cost-of-living survey](#) shows that in August 2024 almost a fifth (18 per cent) of London residents were struggling to make ends meet or having to go without basic needs or rely on debt, which is referred to as financially struggling. This is a slight decrease compared to a year ago (21 per cent) but remains high.

To manage living costs, 47 per cent of London residents report to be spending less on non-essentials, and 29 per cent report using ‘free transport (walking or cycling)’. Both these measures will likely influence the purposes and modes people are using to travel in London. Some of this can be seen in the 2023/24 LTDS data, which shows that London residents were making 11 per cent fewer trips for leisure purposes and eight per cent fewer trips for shopping and personal business compared to the previous year.



## The travel behaviour of London residents

TfL conducts a rolling annual survey of London residents' travel behaviour (the London Travel Demand Survey – LTDS). This provides a detailed view of London residents' travel alongside comprehensive socio-demographic data, allowing trends to be examined by social group.

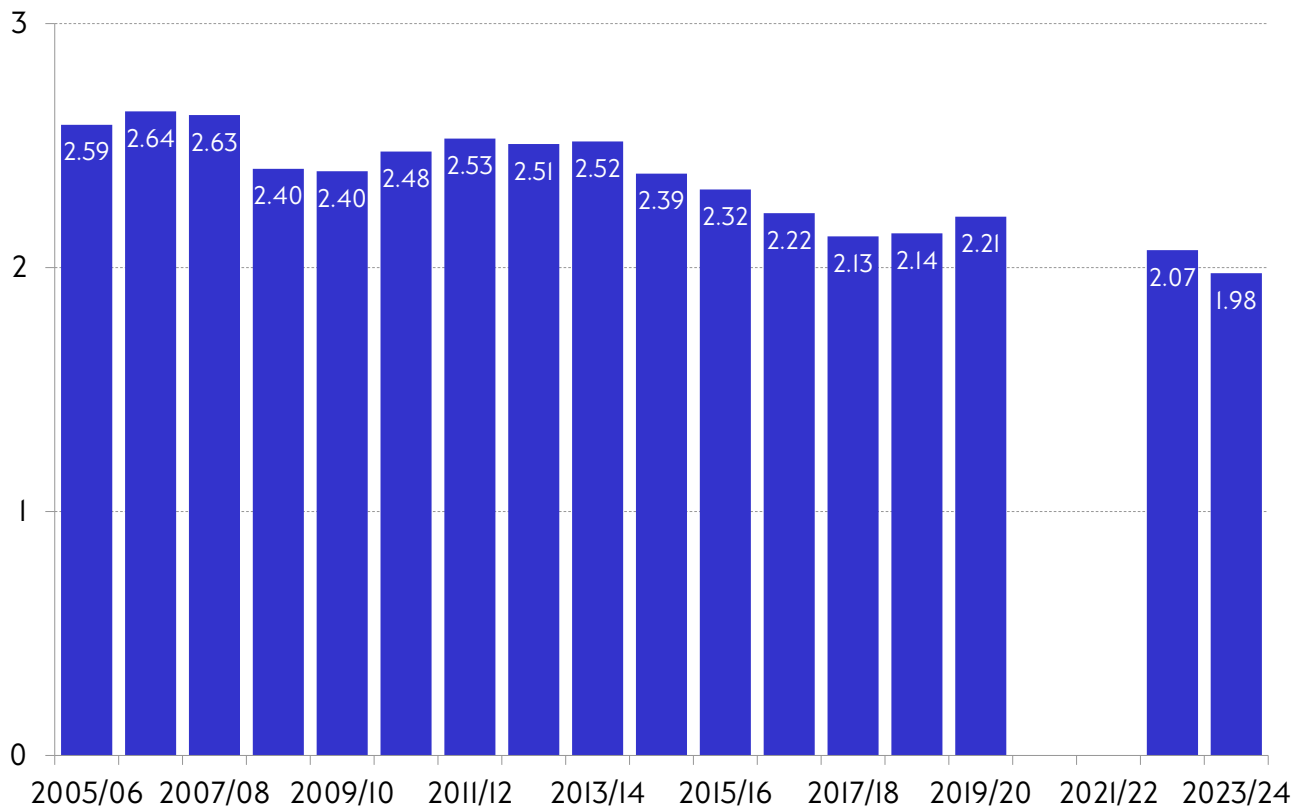
The 2023/24 LTDS provides the second year of post-pandemic travel patterns and is directly comparable with the most recent pre-pandemic survey (2019/20) and the longer-term historical series. This year of data is of particular interest given that 2022/23 was still affected by residual pandemic effects. The data therefore gives us a good view of what might now be regarded as more established post-pandemic trends.

The travel behaviour trends in 2023/24 present a mixed picture in terms of the progress towards the Mayor's Transport Strategy goals and there is evidence that some emerging trends in travel behaviour, which were intensified by the pandemic, have continued to persist. These changes to travel behaviour among London residents underlie some of the trends for all travel described above and have implications for policy and TfL's business.

### Trip rates and trip lengths

During the coronavirus pandemic and the accompanying travel restrictions, trip rates reached unprecedented lows. Although trip rates have since recovered, average trip rates in 2022/23 were 6.2 per cent lower than in 2019/20 and there was a further decline of 4.6 per cent in 2023/24, despite what might have been expected to be a year of continuing post-pandemic recovery (figure 6).

Figure 6 Trips per person per day by London residents, LTDS, 2005/06-2023/24.



Source: TfL Strategic Analysis, Customer & Strategy.

Note: Comparable data is missing for 2020/21 and 2021/22 due to the impacts of the coronavirus pandemic.

The average trip rate is now 1.98 trips per person per day across a seven-day week, some 10.5 per cent below the pre-pandemic position. Much of the decline in the most recent year reflects a reduction in walk (all the way) trips, down by 10 per cent, although an element of adjustment since the pandemic may partly explain this. The evidence thus suggests that the long-term pre-pandemic trend of falling demand for travel per person, reflected through trip rates and observed elsewhere in the country, continued in 2023/24.

The average distance travelled in 2023/24 was 11.3 kilometres per person per day (including trips to, from and within Greater London). This was a reduction of 14 per cent compared with 2019/20. The length of time that residents spent travelling decreased from 72 minutes per person per day in 2005/06, when the current survey series started, to 61 minutes in 2019/20. In 2022/23, this declined to 56 minutes, the first time that the average time spent travelling in a day fell under one hour. In 2023/24, there was a further decline to 54 minutes per person per day.

Commuting (usual workplace), education and other trip rates have increased since 2022/23 (by one per cent, 13 per cent and three per cent, respectively). However, other work trips (work-related travel that is not to or from the usual workplace), shopping/personal business and leisure trip rates have all declined in the latest year, by 12 per cent, eight per cent and 11 per cent, respectively. Therefore, the decline in trip rates in the latest year has been driven by a fall in the rate of work-related travel (other than commuting) and discretionary trips. It is thought that these changes in trip rates reflect a range of social, structural and economic factors already present before the pandemic but most likely exacerbated by it.

### **Mode shares for London residents' travel**

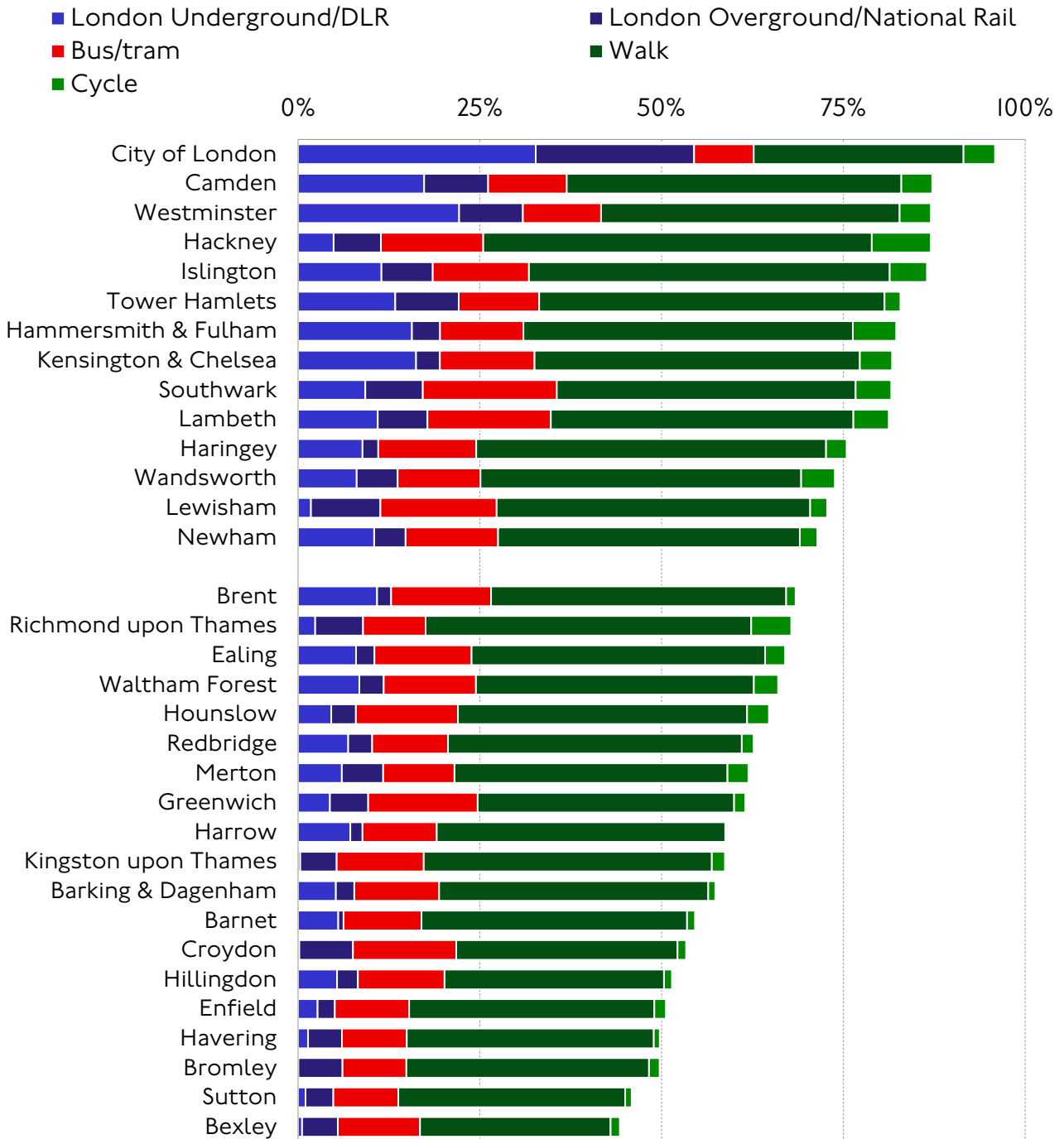
The net outcome in London residents' active, efficient and sustainable mode share for 2023/24 was an increase from 66.7 per cent in 2022/23 to 67.2 per cent. The key changes in travel by mode (based on residents' trips) in 2023/24 with respect to 2022/23 were an increase of three percentage points in the public transport mode share (to 27 per cent), a small decline in the share of trips made by private modes (to 33 per cent) and a decrease in the share of trips made by active modes (to 40 per cent), following strong increases in 2022/23, and particularly affecting walking (down from 39 to 37 per cent of trips, albeit reflecting walk-all-the-way trips only). However, both walking and cycling mode shares remained above 2019 levels and active travel was three percentage points higher than pre-pandemic values, suggesting that some of the increases seen during the pandemic have been sustained. This is all in the context of lower overall trip rates.

Note that this is for London residents only and is not the same as the Mayor's aim for 80 per cent of all trips in London to be made by active, efficient and sustainable modes by 2041 (see above).

Figure 7 shows the active, efficient and sustainable mode share at borough level (for trips by London residents only that start in each borough), and this demonstrates the scope that exists to improve achievement of the 20 minutes of active travel measure.

The proportion of residents' trips made by active, efficient and sustainable modes starting in inner London boroughs ranges from 71 to 96 per cent, compared with 44 to 68 per cent in outer London boroughs. Although each borough has a unique set of circumstances that determine these shares and affect the ability to change them, the scope for change, from smallest to largest, is evident.

Figure 7 Trip-based active, efficient and sustainable mode share by borough of trip origin (inner London boroughs followed by outer London boroughs), LTDS, 2022/23-2023/24 two-year average.



Source: TfL Strategic Analysis, Customer & Strategy.

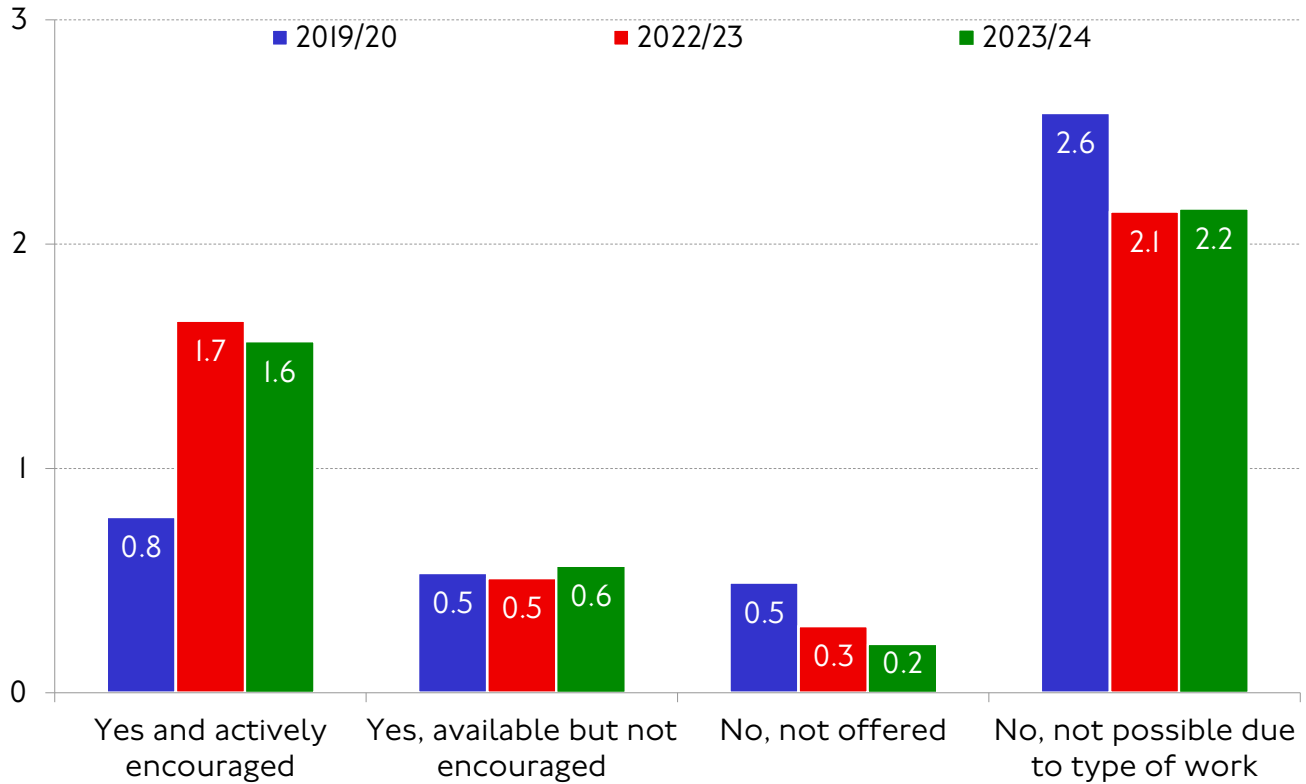
### Hybrid working

Figure 8 shows how the ability to work from home has changed since the pandemic among working London residents.

The number of workers that can work from home and are actively encouraged to do so doubled between 2019/20 and 2023/24, from 0.78 million to 1.57 million, although with a slight decline in the latest year. This accounts for around 35 per cent of London resident

workers, albeit focused on certain economic sectors. Around half a million workers (13 per cent) could work from home but are not encouraged to do so. A further 2.37 million workers (53 per cent) are not able to work from home, either because it is not offered or not possible due to the type of work.

Figure 8 London resident workers (in millions) by ability to work from home, LTDS, 2019/20, 2022/23 and 2023/24.



Source: TfL Strategic Analysis, Customer & Strategy.

According to the ONS Opinions and Lifestyle Survey, workers in the highest income bands, those who are educated to degree level or above and those in professional occupations are most likely to work from home (either all the time or as a hybrid worker). Self-employed workers, parents of dependent children and those who commute to work by rail or Underground are also more likely to work from home, whereas younger workers are less likely to work from home compared to older workers. Jobs based in workplaces in London and the South East are much more likely to be possible to do from home compared to the rest of the UK, due to a higher proportion of professional occupations in the region.

The post-pandemic increase in the ability to work from home remains a significant influence on travel patterns in London (particularly on weekdays and for trips to/from central London). The Centre for Cities report [Return to the office: how London compares to other global cities, and why this matters](#) shows that while office attendance in London has increased steadily since the pandemic, this lags behind other global cities. In mid-2024 the average number of days worked in the office in London was 2.7, compared to 3.5 days in Paris and 3.1 days in New York.

Furthermore, there is evidence that non-London commuters are more likely to work from home than London resident workers. In June 2024, central London office workers living within Greater London attended the office on 2.9 days per week on average compared to 2.1 days per week for those living outside Greater London.

# Healthy streets and healthy people

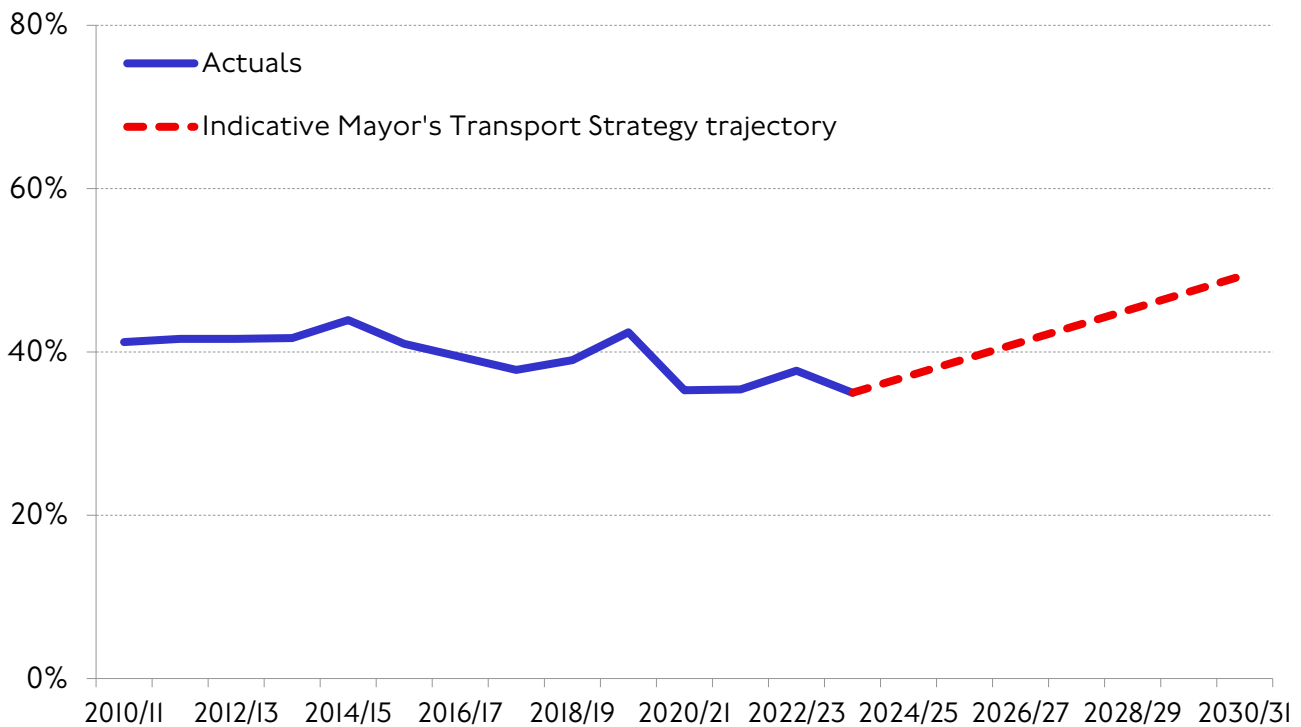
## Active travel

Active travel is good for both the environment and people’s health. The Mayor aims for 70 per cent of all Londoners to do 20 minutes of active travel (defined as walking or cycling) per day by 2041. Walking and cycling can be used exclusively for many trips, but walking is often used incidentally to access public transport, for example on the daily walk to the local station to catch a train as part of a longer trip for which the train would be the main mode.

### Physical activity and travel

Historically, the 20 minutes of active travel measure has been around 40 per cent (figure 9). The pandemic itself had a mixed effect on this indicator. A relative uplift in local and active travel, most notably as part of permitted activities during periods of lockdown, was countered by more general restrictions on mobility, particularly a dramatic reduction in public transport trips. So, achievement against this measure fell slightly during the pandemic, although this reflected a resilient performance given the circumstances.

Figure 9 Proportion of London residents achieving at least 20 minutes of active travel per day, LTDS, 2010/11-2030/31.



Source: TfL Strategic Analysis, Customer & Strategy.

Data for this measure for 2023/24 shows that the percentage of London residents meeting the target stands at 35 per cent, a decline of 2.7 percentage points compared to 2022/23. Although public transport usage (and associated active travel access) has increased in the latest year, there has been a decline in the walking trip rate which has contributed to this most recent fall.

## Cycling

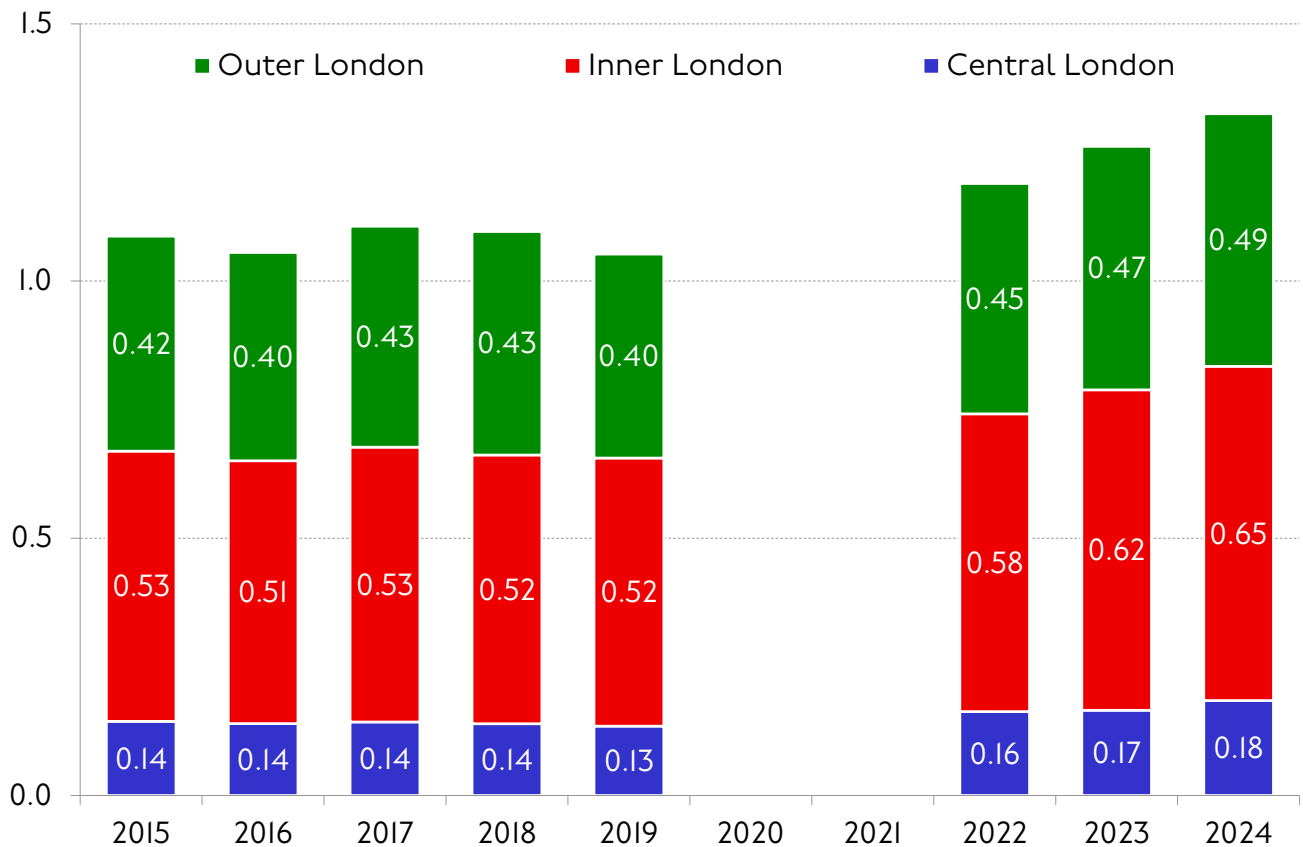
Following a rapid increase in cycling in the 2000s and early 2010s, with little change throughout the late 2010s, the coronavirus pandemic triggered a renewed interest for cycling that has resulted in steady growth between 2022 and 2024 and a net 26 per cent increase in 2024 compared to 2019 before the pandemic.

### Overall trends in cycling

We monitor cycling against the target set in the [Cycling Action Plan 2](#) using estimates of daily cycle journeys (journey stages) derived from a set of representative cycle counts across London undertaken every year in the spring.

Figure I0 shows the trend in daily cycle stages broken down by area of London.

Figure I0 Daily cycle stages (in millions) in London by area, seven day-week average, 2015-2024.



Source: TfL Strategic Analysis, Customer & Strategy.

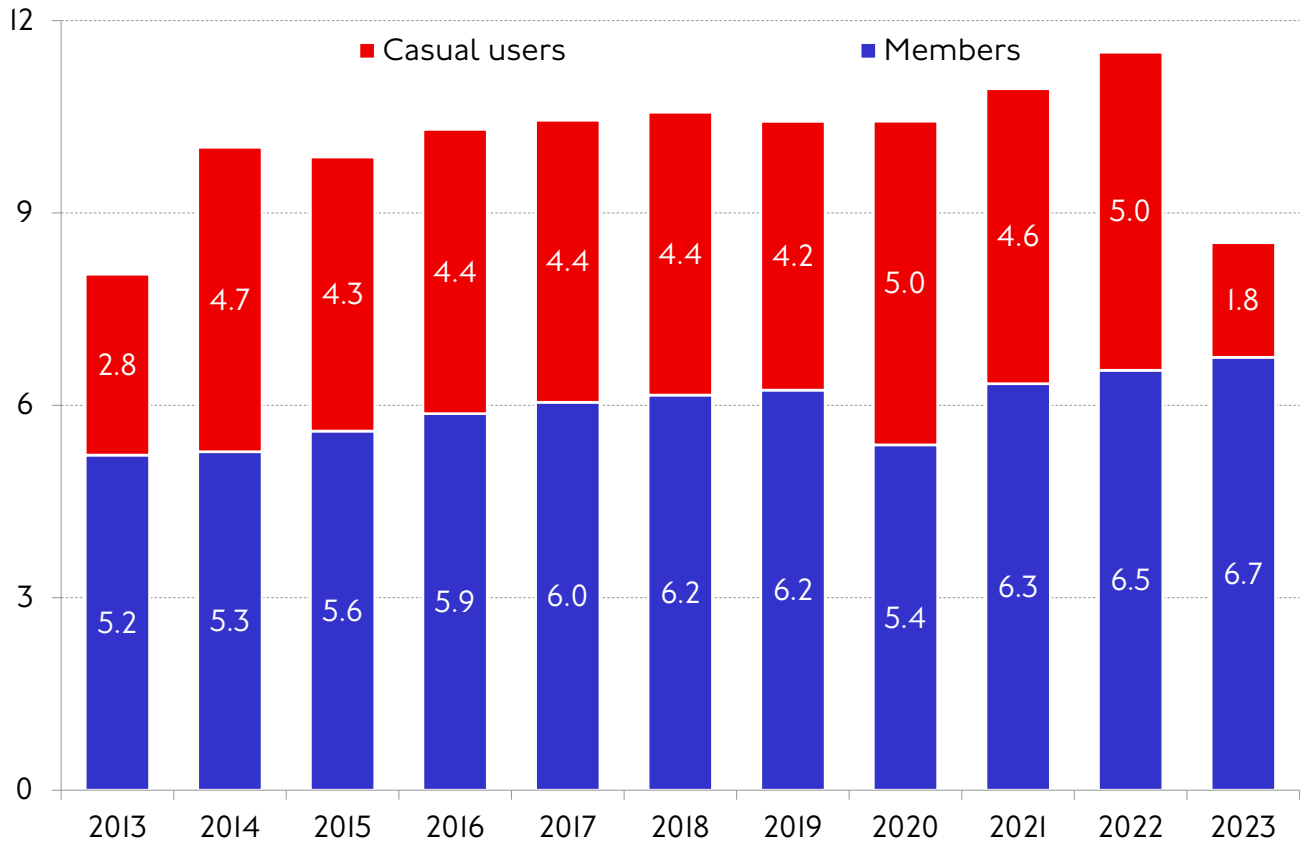
Note: Comparable data is missing for 2020 and 2021 due to the impacts of the coronavirus pandemic.

In 2024 there were an estimated 1.33 million daily cycle stages across London, up by five per cent from 1.26 million in 2023 and by 26 per cent from 1.05 million in 2019. This growth was strongest in central London (11.6 per cent increase between 2023 and 2024), followed by inner London (4.2 per cent) and outer London (3.8 per cent). In absolute terms, however, inner London continues to see the most cycle stages (almost 650,000).

## Santander Cycles

After a decade of sustained growth in demand on Santander Cycles (TfL’s cycle hire scheme), in 2023 the total number of hires dropped by 26 per cent to 8.5 million hires (figure II).

Figure II Annual hires (in millions) on Santander Cycles by user type, 2013-2023.



Source: TfL Cycle Hire.

On closer inspection, the drop occurred only in demand from casual users (that is, those who are not registered members), while hires by members continued to increase (by three per cent between 2022 and 2023).

This decrease in casual user hires is thought to reflect two main factors:

- The changes to the fare system that were introduced in late 2022 (of which the full impact is only apparent in the annual 2023 statistics). In particular, the withdrawal of the 24-hour tariff, which was replaced by a single ride fare. To mitigate this, TfL introduced a Day Pass option earlier this year.
- The rise in dockless cycles (particularly e-bikes) from private operators, which compete for the same customer base. The main private operators have between four and five times more cycles than TfL’s Santander Cycles and furthermore their dockless nature means that they can often be found near Santander Cycles stations and have the competitive advantage that they can be picked up and dropped off anywhere. TfL is undertaking several initiatives to mitigate this and help win customers back, for example enhancing the on-street and digital offer and increasing the number of e-bikes in the Santander Cycles fleet. Over the summer of 2024 an additional 1,400 e-bikes were introduced, replacing conventional pedal cycles on street, so that currently one in six Santander Cycles available for hire is an e-bike.

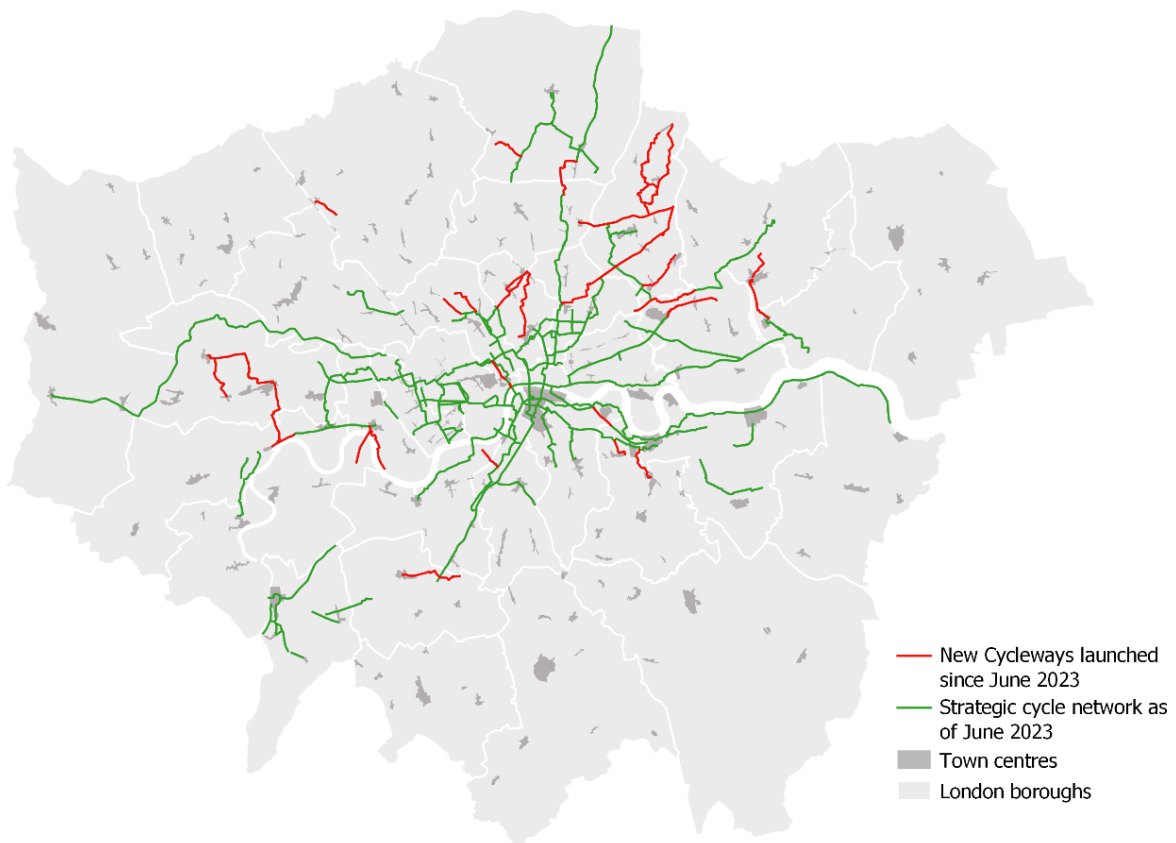
## Access to London's Cycleway network

The [Cycling Action Plan 2](#), published in June 2023, highlights the potential of cycling and sets out a comprehensive delivery plan to broaden the appeal of cycling to a wider range of Londoners, including those from groups currently under-represented in cycling.

Expanding the Cycleway network is essential for cycling to become an attractive option for all Londoners, and the Cycling Action Plan 2 sets an ambitious target for 40 per cent of Londoners to live within 400 metres of the strategic cycle network by 2030.

We have made good progress in 2023/24, launching 20 new Cycleway routes connecting over 600,000 Londoners to the network. Working with the boroughs, we have increased the length of the strategic cycle network from 90 kilometres in 2016 to 403 kilometres by September 2024 (figure I2). This means that, as of September 2024, 27.4 per cent of Londoners live within 400 metres of the strategic cycle network, up 3.2 percentage points (from 24.2 per cent) in autumn 2023 and from an estimated five per cent in 2016 (up by 22.4 percentage points).

Figure I2 London's strategic cycle network, September 2024.



Source: TfL Customer & Strategy.



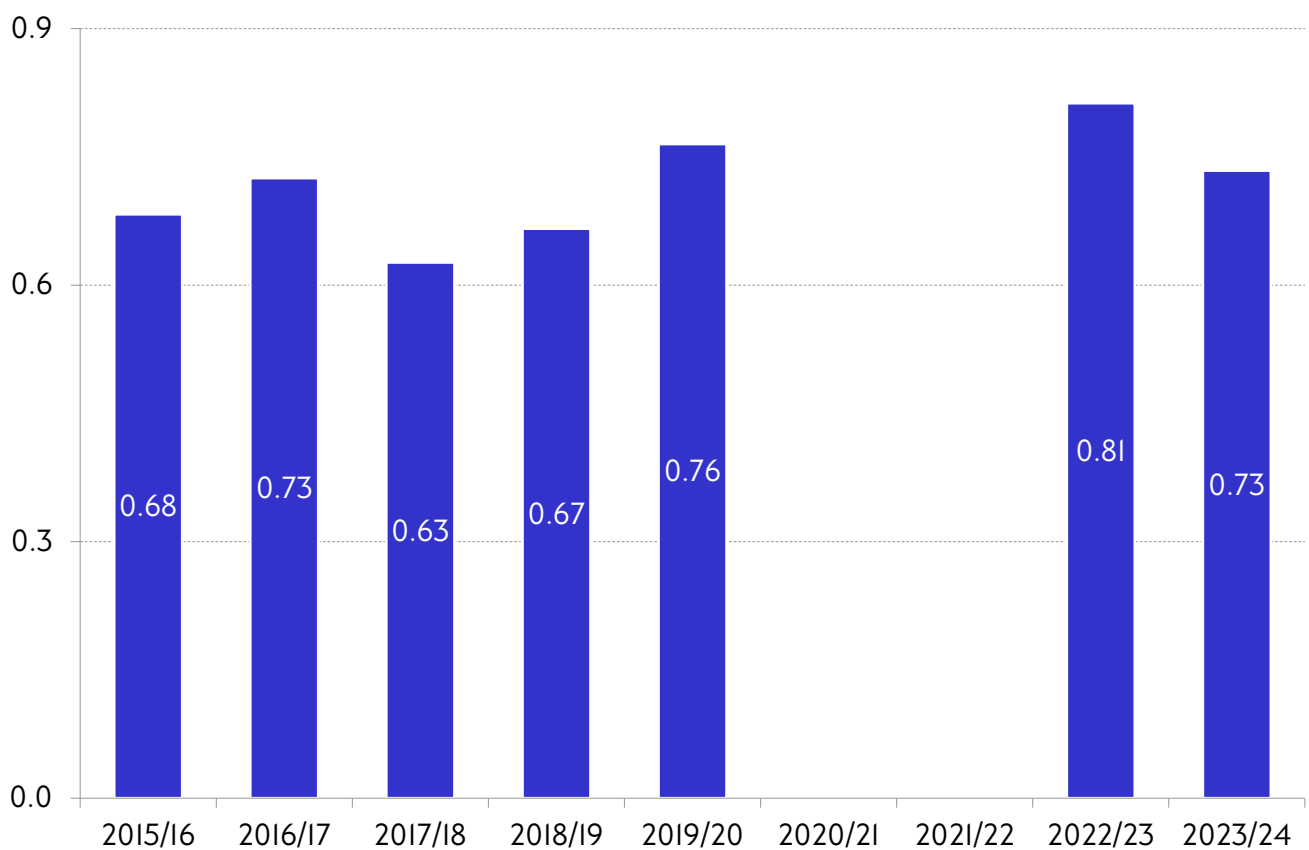
## Walking

Walking is the most frequently used mode of travel in London, accounting for an estimated 39 per cent of all trips by London residents. About half of all walking in London is as part of a longer public transport journey, for example walking to a bus stop.

### Walking by London residents

Despite fluctuations between 2015/16 and 2017/18, since 2017/18 there was a consistent increase in walking (all the way) trip rates from 0.63 trips per person per day on average in 2017/18 to 0.81 in 2022/23. However, walk trip rates declined in 2023/24 to 0.73 per person per day, a 10 per cent decrease on 2022/23 but still higher than all other years in the past decade except 2019/20 (figure 13).

Figure 13 Walking trips per person per day by London residents, LTDS, 2015/16–2023/24.



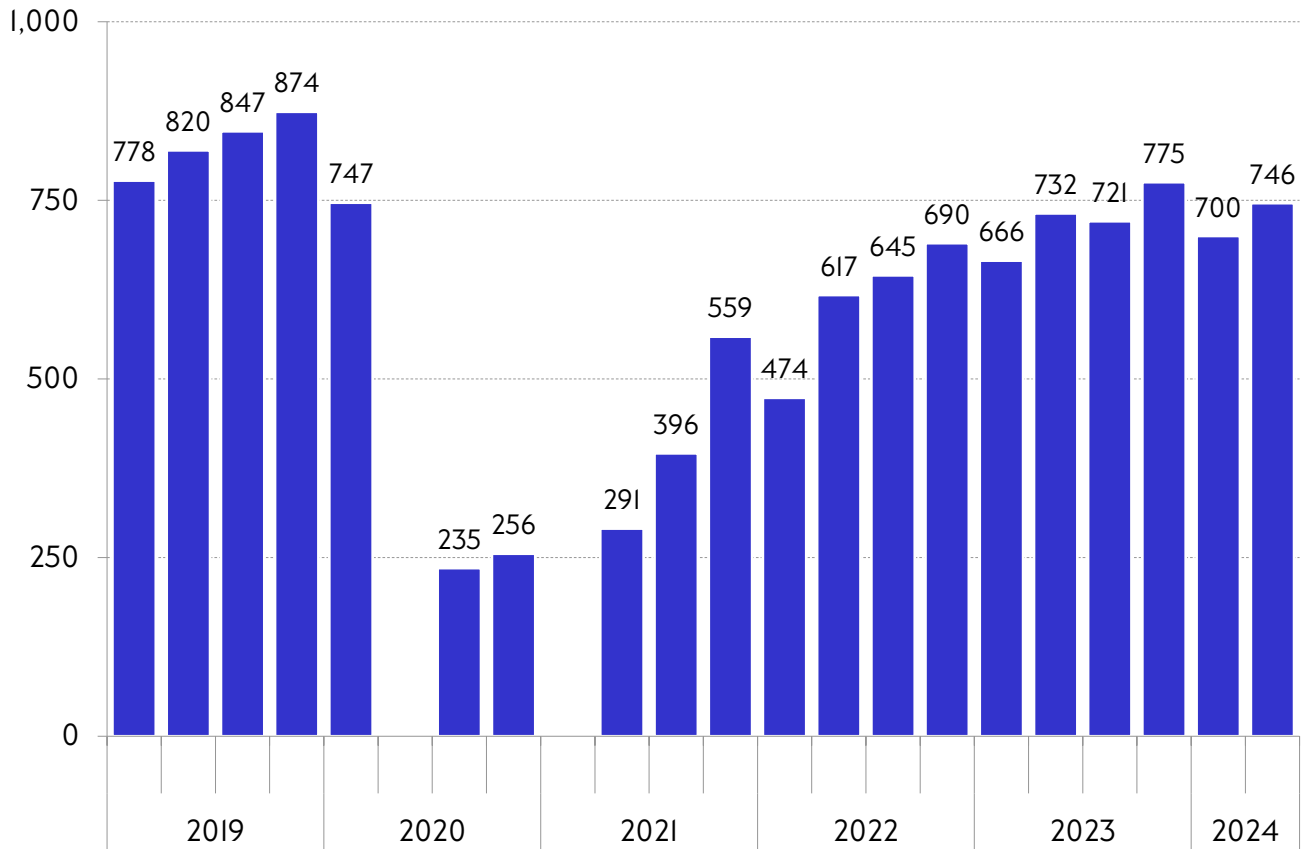
Source: TfL Strategic Analysis, Customer & Strategy.

Note: Comparable data is missing for 2020/21 and 2021/22 due to the impacts of the coronavirus pandemic.

### Pedestrian activity in central London

Travel to and around central London was particularly affected by the pandemic. Our quarterly survey of pedestrian activity in central London (within the Congestion Charge zone) provides an interesting trend view of both the pandemic impact and the recovery (figure 14). During the first half of 2024, the number of pedestrians observed in central London settled at about 10 per cent short of pre-pandemic levels, comparable to the ongoing relative patronage shortfall on public transport.

Figure I4 Average hourly pedestrian flow (persons per hour per site) in central London, by quarter, quarter I 2019 (Jan-Mar)-quarter 2 2024 (Apr-Jun).



Source: TfL Strategic Analysis, Customer & Strategy.

Note: Data from some quarters is missing due to the impacts of the coronavirus pandemic.

## Reducing road danger

### Vision Zero

The Mayor’s [Vision Zero action plan](#) sets out the ambition to reduce road danger in London by eliminating all deaths and serious injuries from London’s streets by 2041. Progress towards this aim is tracked through collision and casualty statistics collated on an annual basis and published as annual [Casualties in Greater London](#) factsheets.

### Trend in casualties to 2023

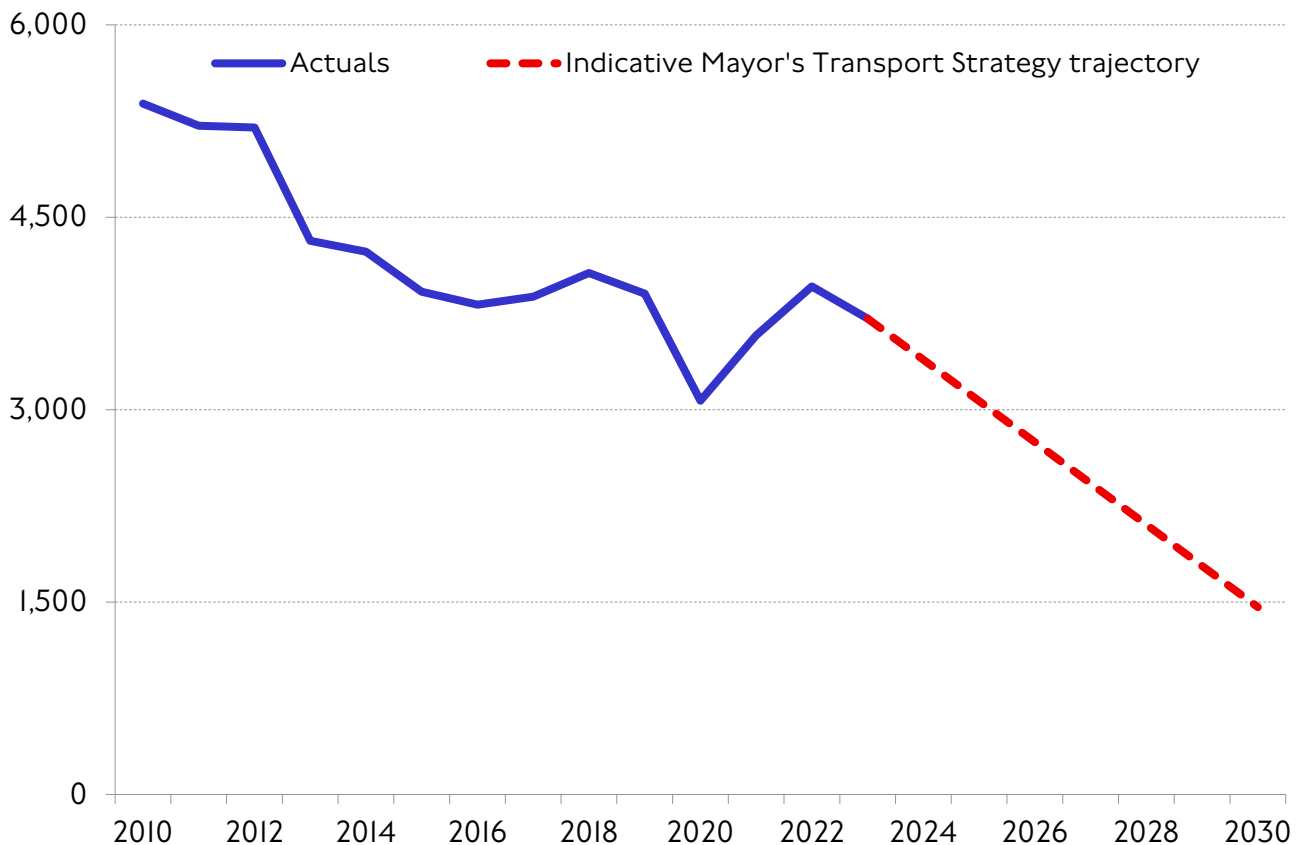
In 2023, 3,710 people were killed or seriously injured on London’s roads, the lowest figure outside the pandemic-affected years, and a six per cent reduction on 2022 (3,961 people). Overall, 26,176 people were injured on London’s roads (all severities), a four per cent reduction against 2022 (27,207 people).

We have a stretching ambition for reducing road casualties in London: a 70 per cent reduction in the number of people killed or seriously injured on London’s roads by 2030, when compared to the Mayor’s Transport Strategy baseline of 2010-14 (figure I5). To date there has been noteworthy progress:

- A 30 per cent reduction in the number of people killed in collisions to the lowest number on record except for pandemic-affected 2021.
- A 24 per cent reduction in the number of people killed or seriously injured on London's roads to the lowest number on record outside of pandemic-affected 2020 and 2021.
- A 41 per cent reduction in the number of children (under 16) killed or seriously injured.
- A 16 per cent reduction in the number of people slightly injured, showing a reduction in the total amount of harm from road danger in London.

This is positive and welcome progress. However, we recognise that more needs to be done if we are to meet our ambitious targets for London for 2030.

Figure I5 People killed or seriously injured on London's roads, 2010-2030.



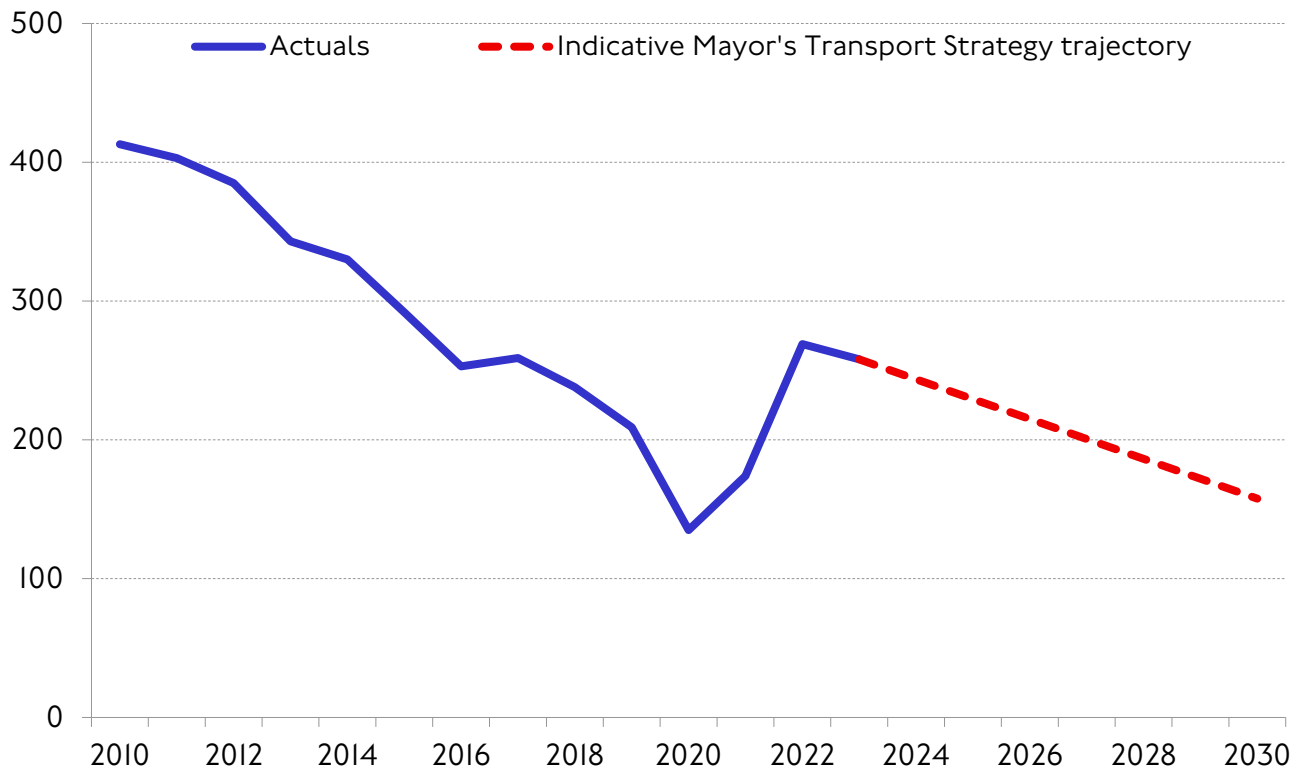
Source: TfL Insights & Direction, Safety, Health & Environment.

### Casualties involving TfL buses

In 2023 there were no reportable bus occupant (passengers and drivers) fatalities for the first time since 2014, and 33 per cent fewer people were killed or seriously injured on a London bus against the 2010-14 baseline (from 180 to 121). In 2023 there were 137 people killed or seriously injured in collisions involving a bus on London's roads (including six fatalities). This was a 30 per cent decrease against the 2010-14 baseline, but a four per cent increase on 2022. Figure I6 shows progress towards our target as the sum of these two categories.

More information on TfL's initiatives to improve bus safety, including the design of bus interiors, is set out in our new [Bus safety strategy](#).

Figure 16 People killed or seriously injured on or by a London bus, 2010-2030.



Source: TfL Insights & Direction, Safety, Health & Environment.

## Air quality

### The Ultra Low Emission Zone

On 29 August 2023 the Mayor of London expanded the Ultra Low Emission Zone (ULEZ) across all London boroughs to help tackle air pollution in the capital and improve air quality for Londoners. The ULEZ boundary is now the same as the boundary for the Low Emission Zone (LEZ) for heavy vehicles. The London-wide zone measures 1,500km<sup>2</sup> and covers nine million people, making it the largest zone of its kind in the world.

The [London-wide Ultra Low Emission Zone - Six months report](#) published in July 2024 evaluated the impacts of the scheme to that point, including the important context of pre-emptive change by individuals and businesses in the period leading up to the introduction of the scheme, as well as previous expansions to the ULEZ and the introduction of tighter standards for the (existing) Low Emissions Zone. The key findings from this report are:

- Compared to a scenario where the ULEZ had not been expanded, nitrogen oxides (NO<sub>x</sub>) emissions from cars and vans in outer London were estimated to be 13 and 7 per cent lower, respectively, equating to a saving of 424 tonnes of NO<sub>x</sub> in outer London. Fine particulate matter (PM<sub>2.5</sub>) exhaust emissions from cars and vans in outer London were estimated to be 20 per cent lower than they would have been had the zone not been expanded to outer London.
- These emissions reductions are improving air quality. In the first six months of operation, roadside nitrogen dioxide (NO<sub>2</sub>) concentrations in outer London were up to 4.4 per cent lower than would have been expected without the London-wide ULEZ.

- All ULEZ policies combined have had a positive impact on improving air quality across London. On average, harmful roadside NO<sub>2</sub> concentrations are estimated to be:
  - 21 per cent lower in outer London than they would have been without the ULEZ and its expansions.
  - 53 per cent lower in central London than they would have been without the ULEZ and its expansions.
  - 24 per cent lower in inner London than they would have been without the ULEZ and its expansions.
- Long-term trends indicate that average concentrations in all London zones improved at a faster rate than the average for the rest of England over the same period. This is particularly notable in outer London, where concentrations have improved more rapidly over recent years and are now similar to the average for rest of England, which has historically been lower.
- Areas outside London are also seeing the impacts of the ULEZ, with roadside NO<sub>2</sub> concentrations within five kilometres of the Greater London boundary on average nine per cent lower in 2023 than in an estimated 'no ULEZ' scenario. As this is an average for the whole boundary zone, this means that some roads will be seeing even greater reductions.
- A larger proportion of vehicles recorded driving in London are cleaner. The London-wide compliance rate for vehicles subject to the ULEZ standards after the first six months was 96.2 per cent, up from 91.6 per cent in June 2023 and 39 per cent in February 2017, when changes associated with the ULEZ began.
- Compliance rates have increased for both cars and vans: 97.1 per cent of cars and 88.9 per cent of vans seen driving in the London-wide ULEZ met the standards after six months of operation, up from 93 and 80.2 per cent in June 2023 and 44 and 12 per cent in February 2017.
- There are fewer older, more polluting vehicles driving in the zone. On an average day in February 2024, there were 90,000 fewer non-compliant vehicles detected in the London-wide ULEZ, compared to June 2023. This is a 53 per cent reduction in non-compliant vehicles between those dates.
- In the expanded outer London area, ULEZ vehicle compliance in February 2024 was over 96 per cent, up from 90.9 per cent in June 2023. This is nearly the same level of compliance as seen in inner and central London, with 96.5 per cent and 96.4 per cent, respectively.
- In outer London in February 2024, over 97 per cent of cars met the ULEZ standards, up from 92.4 per cent in June 2023. Van compliance in outer London has increased by 9.5 percentage points, now 89 per cent, up from 79.5 per cent in June 2023.

The impact of the ULEZ can be assessed through three main measures:

- Compliance with the requirements of the scheme.
- Emissions of atmospheric pollutants from road vehicles
- Concentrations of pollutants in the atmosphere.

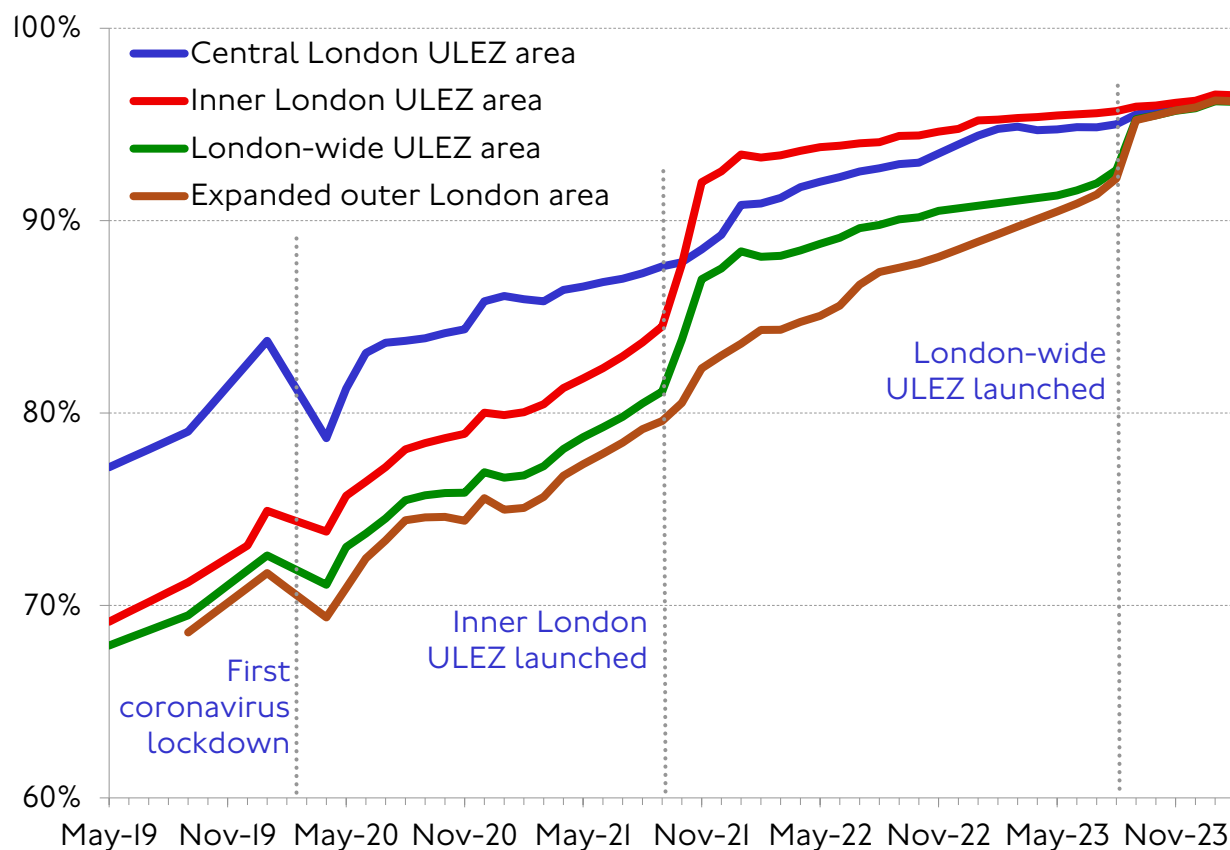
### **Compliance with the requirements of the scheme**

The ULEZ requires individuals, charities, organisations, and businesses with non-compliant vehicles to take action, and either replace a non-compliant vehicle or change how they regularly travel. To help vehicle owners prepare for the London-wide ULEZ, an extensive public information campaign commenced in January 2023 to ensure that

everyone was ready. This was in addition to significant stakeholder and local borough engagement and press activity to raise awareness of the scrappage scheme and other support available. The scrappage scheme was launched in January 2023 as this was a principal mitigation to the scheme. We would therefore expect to see changes in how people travel and vehicle replacements in the build-up to the launch date. However, it is still helpful to compare the immediate impact before and after the scheme launch.

Compliance with the requirements of the expanded scheme in London is monitored through automatic number plate recognition cameras (ANPR). As shown in figure 17, the London-wide expansion of the ULEZ led to a rapid rate of increase in compliance in outer London in 2023, as Londoners and businesses prepared for the scheme. As such, six months after expansion, compliance rates across different areas of London are now similar, and over 96 per cent of all vehicles meet the standards.

**Figure 17** Average vehicle compliance with the requirements of the Ultra Low Emission Zone (ULEZ) for vehicles subject to the ULEZ standards (excluding taxis and larger vans/lorries), by month, May 2019-Feb 2024.



Source: TfL Strategic Analysis, Customer & Strategy, based on Greater London Authority data.

### Emissions of atmospheric pollutants from road vehicles

The ULEZ is based on road vehicle engine emissions standards and disincentivises the use of older vehicles with higher pollutant emissions in the zone. Therefore, the ULEZ policy directly influences emissions reductions from vehicles. Reducing emissions of pollution is essential to reduce concentrations of harmful pollution in the air, and ultimately to improve the health of all Londoners.

Emissions rates in 2023 reflect the changes in the vehicle fleet that occurred across 2023, including any pre-compliance prior to the London-wide ULEZ expansion on 29 August

and its operation for the rest of the year. Importantly, emissions rates for the 2023 scenario without the London-wide ULEZ reflect that there would have been natural churn in the vehicle fleet, as there is always turnover of vehicles and uptake of newer vehicles, but do not include the additional impacts of the London-wide ULEZ. The difference between the 2023 scenarios (with and without the London-wide ULEZ) therefore represents the impact on emissions of the expansion of the ULEZ.

When looking at London as a whole, it is estimated that NO<sub>x</sub> emissions from cars and vans were 11 and 6 per cent lower, respectively, than would have been expected without the London-wide ULEZ expansion. This equates to a saving of 456 tonnes of NO<sub>x</sub> emissions across (table 2).

**Table 2** Change in car and van NO<sub>x</sub> emissions, by area, 2023 with London-wide ULEZ compared to the 2023 scenario without the London-wide ULEZ.

Area	Car emissions (tonnes)	Van emissions (tonnes)	Car and van emissions (tonnes)
Central	1 (3%)	-3 (-5%)	-2 (-3%)
Inner	-7 (-1%)	-23 (-4%)	-30 (-3%)
Outer	-297 (-13%)	-127 (-7%)	-424 (-11%)
London-wide	-304 (-11%)	-152 (-6%)	-456 (-9%)

Source: Greater London Authority.

The biggest impacts on emissions from cars and vans are estimated to have occurred in the outer London zone because the ULEZ already operated in central and inner London. This equates to a saving of 424 tonnes of NO<sub>x</sub> in outer London in 2023. The NO<sub>x</sub> emissions savings in outer London represent over 90 per cent of the total emission reductions seen in Greater London from the London-wide expansion.

It is estimated that PM<sub>2.5</sub> exhaust emissions from cars (excluding PHVs) and vans were 18 and 14 per cent lower across Greater London they would have been without the London-wide ULEZ. Overall, PM<sub>2.5</sub> exhaust emission in London were 17 per cent lower, an estimated saving of six tonnes (table 3).

**Table 3** Change in car and van PM<sub>2.5</sub> exhaust emissions, by area, 2023 with London-wide ULEZ compared to the 2023 scenario without the London-wide ULEZ.

Area	Car emissions (tonnes)	Van emissions (tonnes)	Car and van emissions (tonnes)
Central	0.0 (2%)	0.0 (-5%)	0.0 (-2%)
Inner	0.0 (1%)	-0.2 (-6%)	-0.1 (-2%)
Outer	-4.4 (-22%)	-1.2 (-17%)	-5.6 (-20%)
London-wide	-4.3 (-18%)	-1.4 (-14%)	-5.7 (-17%)

Source: Greater London Authority.

## Pollutant concentrations

By reducing the amount of NO<sub>x</sub> emitted by vehicles, the ULEZ helps reduce NO<sub>2</sub> concentrations in the zone. This will reduce the health impacts associated with exposure to NO<sub>2</sub>, which is the key aim of expanding the zone.

Air pollution concentrations are affected by several factors and follow patterns of seasonal variation. It is therefore preferable to have at least a complete year of data to fully understand the impacts of a scheme on air quality.

In addition to the ULEZ and the London-wide LEZ for heavy vehicles, the Mayor has introduced complementary policies such as procuring zero-emission buses, introducing taxi and PHV age limits and emissions-based licensing requirements and enabling active travel and use of sustainable public transport, all of which contribute to changes in pollution concentrations. Therefore, the analysis of concentrations shows the impacts of not just the ULEZ and its expansions, but all of the Mayor's policies to reduce emissions from transport, including those within the Mayor's Transport Strategy. As such, it is not straightforward to isolate the impact of the ULEZ and its expansion. Therefore, the concentrations analysis reflects collectively on all the Mayor's policies to reduce emissions from transport.

Table 4 shows the estimated reduction in concentrations of NO<sub>2</sub> attributable to the various stages of the ULEZ expansion based on trends analysis of monitoring data and comparison against a scenario where there was no ULEZ.

**Table 4** Estimated impact of ULEZ and related policies on average roadside NO<sub>2</sub> concentrations, by area, 2017-2023, based on a comparison with a 'no ULEZ' scenario.

Year	Central	Inner	Outer	All London	Outside
2017	-3%	-3%	-1%	-1%	-1%
2018	-12%	-8%	-2%	-6%	-3%
2019	-31%	-15%	-5%	-12%	-3%
2020	-49%	-19%	-9%	-17%	-1%
2021	-53%	-20%	-13%	-18%	-3%
2022	-52%	-21%	-16%	-20%	-6%
2023	-53%	-24%	-21%	-23%	-9%

Source: Greater London Authority.

In 2023, the average roadside NO<sub>2</sub> concentrations measured in central London were 53 per cent lower than the estimated 'no ULEZ' scenario. In inner London, they were 24 per cent lower and in outer London 21 per cent lower. The impacts on NO<sub>2</sub> concentrations in both inner and outer London are significant given the size of the population in these areas, representing over 95 per cent of people living in London. The impacts observed in central London have been sustained from previous years.

Impacts in 2023 were higher in both inner and outer London compared to 2022 reflecting the phased expansion of the ULEZ. The NO<sub>2</sub> impact of all the ULEZ policies in outer London was five percentage points higher in 2023 than it was in 2022 (21 per cent



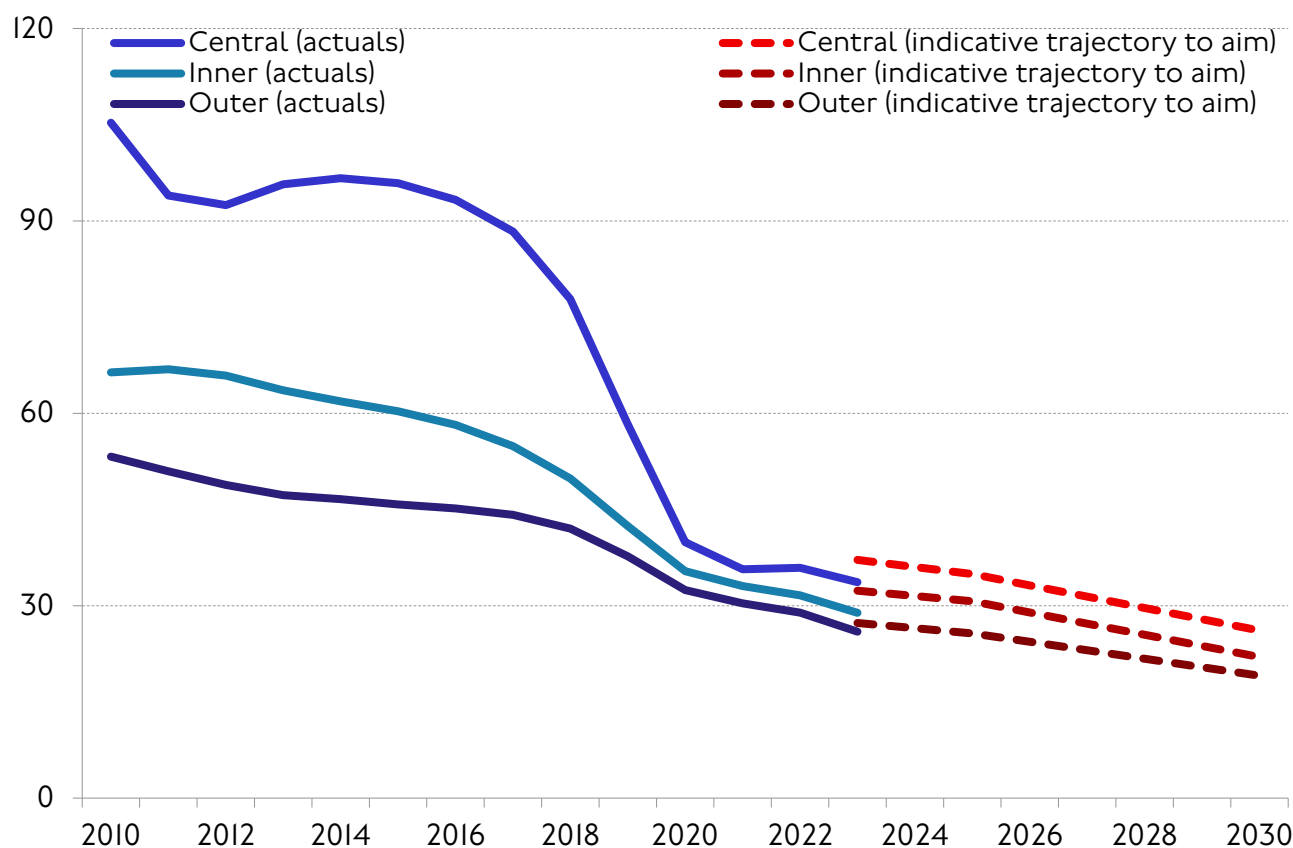
compared to 16 per cent). The analysis of trends of average London concentrations (the whole of London) indicates that the ULEZ has reduced roadside NO<sub>2</sub> concentrations by 23 per cent (equivalent to 8µg·m<sup>-3</sup>) compared to what they would have been without the ULEZ.

Areas outside London are also seeing the impacts of the ULEZ, with roadside NO<sub>2</sub> concentrations within five kilometres from the Greater London boundary on average nine per cent lower in 2023 than an estimated 'no ULEZ' scenario.

### Overall trend in ambient concentrations of nitrogen dioxide (NO<sub>2</sub>)

Figure I8 shows historic progress in reducing concentrations of nitrogen dioxide at roadside monitoring sites.

Figure I8 Average roadside nitrogen dioxide (NO<sub>2</sub>) concentrations (in µg·m<sup>-3</sup>) in London, by area, 2010-2030.



Source: TfL Strategic Analysis, Customer & Strategy, based on Greater London Authority data.

Average NO<sub>2</sub> concentrations reduced from 93µg·m<sup>-3</sup> in 2016 to 34µg·m<sup>-3</sup> in 2023 at roadside sites in central London (a reduction of 65 per cent), despite the recovery from the pandemic leading to a small increase in concentrations in 2022. Concentrations at roadside monitoring sites in inner London reduced from 58µg·m<sup>-3</sup> in 2016 to 29µg·m<sup>-3</sup> in 2023 (a reduction of 55 per cent). During the same period, concentrations at roadside sites in outer London reduced from 45µg·m<sup>-3</sup> to 36µg·m<sup>-3</sup> (45 per cent).

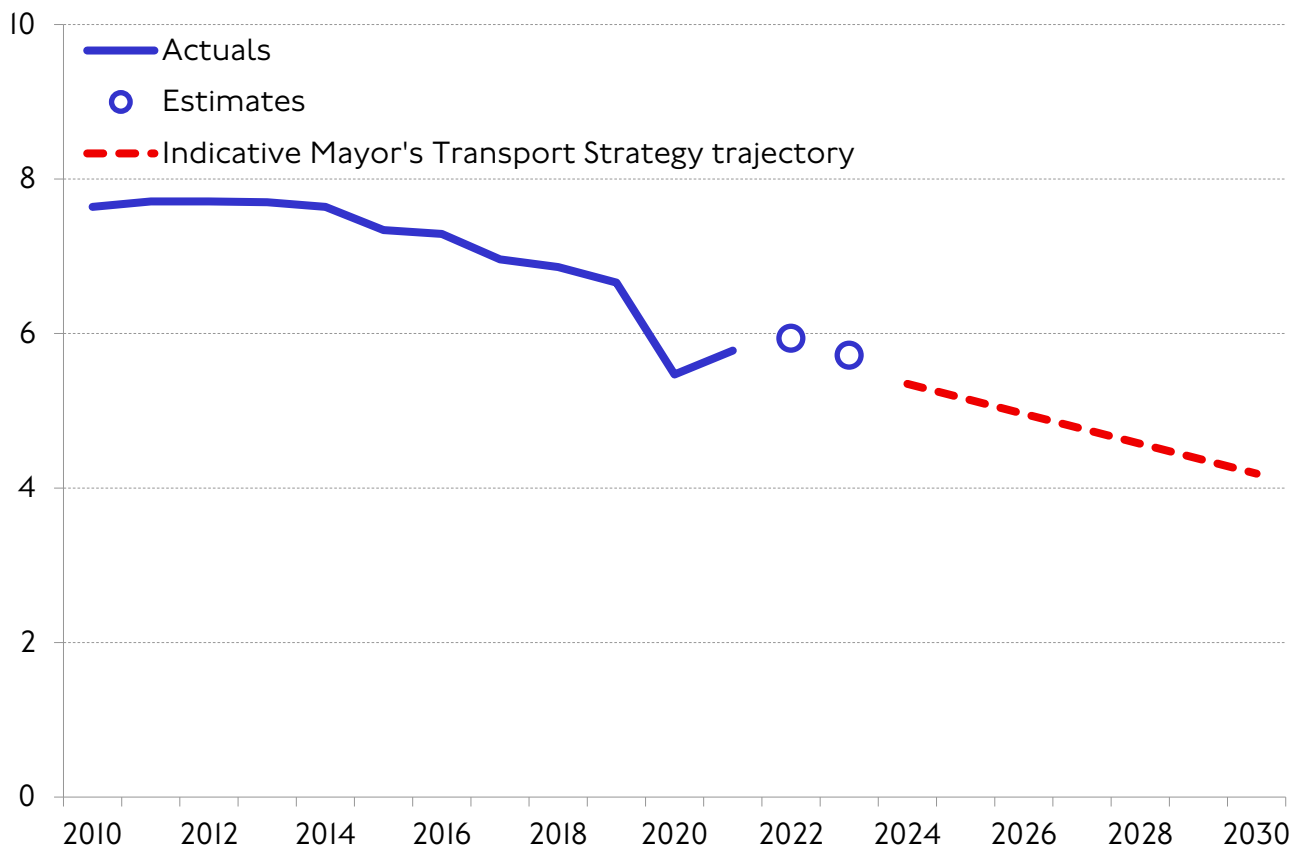
## Carbon net zero 2030

The Mayor's Transport Strategy set a target for London to be a zero-carbon city by 2050. However, the Mayor has stated his ambition for London to be net zero by 2030, recognising the urgency of the climate change emergency. Addressing carbon dioxide (CO<sub>2</sub>) emissions generated by road transport will be central to meeting the 2030 net zero target, as road transport is the second largest contributor to London's carbon dioxide emissions.

### Overall trend in carbon dioxide (CO<sub>2</sub>) emissions from transport

Figure I9 shows the overall trend for London's carbon dioxide equivalent (CO<sub>2</sub>e) emissions from surface transport, and how they have changed over recent years. Estimates for 2022 and 2023 are based on TfL modelled vehicle kilometres by vehicle type, scaled to those years using average traffic growth factors for central, inner and outer London by vehicle type and road category, derived from DfT road traffic statistics across London. Estimates for 2022 reflect a three per cent increase over 2021, principally reflecting the post-pandemic recovery in travel. Provisional estimates for 2023 suggest a reduction against 2022 of four per cent.

Figure I9 Carbon dioxide (CO<sub>2</sub>) emissions from surface transport (in million tonnes) in London (excluding aviation), London Energy and Greenhouse Gases Inventory (LEGGI), 2010-2030.



Source: TfL Strategic Analysis, Customer & Strategy, based on Greater London Authority data.

Notes: The data in this graph includes transport emissions from road, rail and shipping, but not aviation. | Data from 2019-2021 has been revised to align with LEGGI 2021, published December 2023.

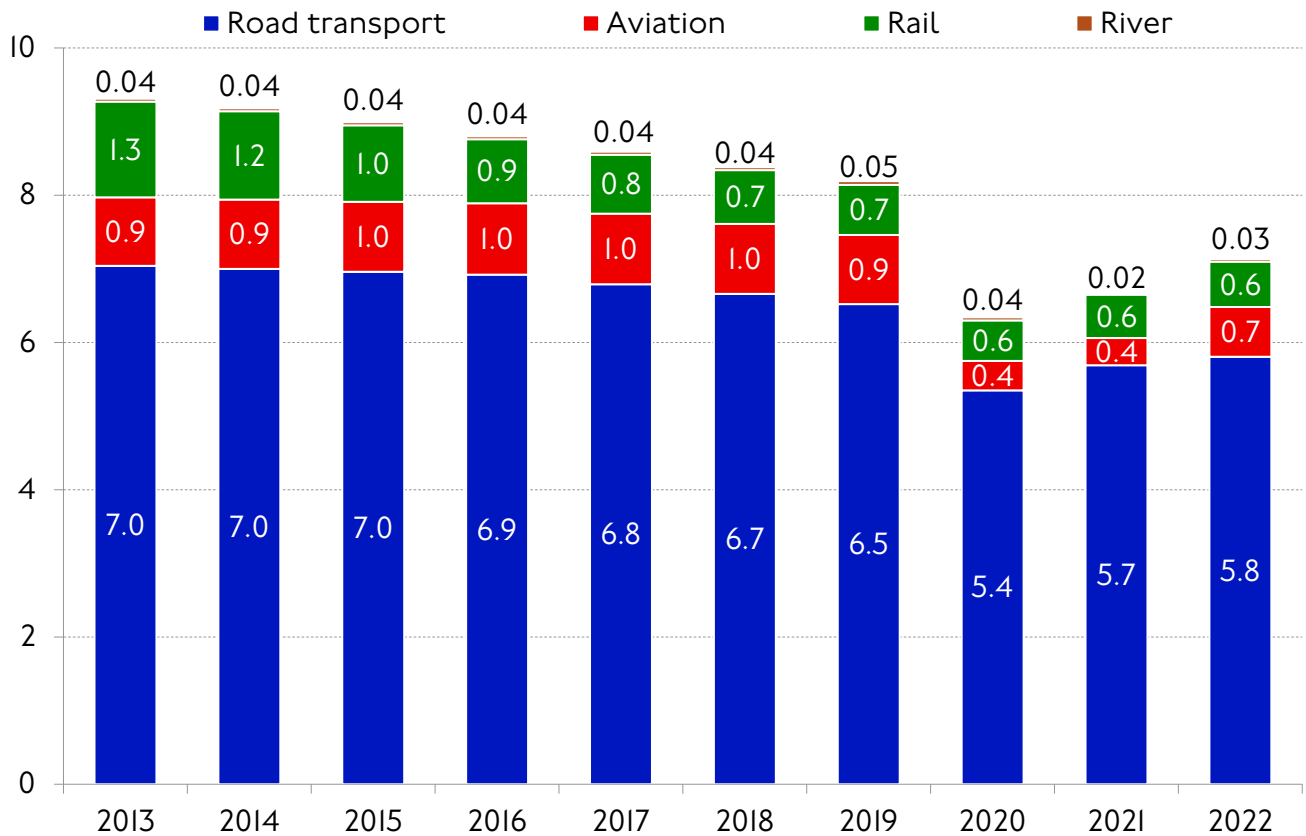
While we are broadly on track to meet the original 2050 ambition, urgent and large-scale action at all levels of Government is needed to meet the accelerated 2030 target. In the interim, we are continuing to cut carbon emissions from our operations and estate, as reported in our [Safety, health and environment annual report 2023/24](#).

### Components of London’s transport carbon dioxide equivalent (CO<sub>2</sub>e) emissions

Figure 20 shows the principal components of London’s transport carbon dioxide equivalent emissions and how they have changed over recent years.

London’s road transport carbon dioxide equivalent emissions have gradually reduced from seven million tonnes in 2013 to 5.8 million tonnes in 2022, an 18 per cent reduction. However, this significant reduction is partly due to the impact of the pandemic. By comparison, in 2019 road transport emissions were 6.5 million tonnes (a seven per cent reduction compared to 2013), and the 2022 emissions were up by eight per cent compared to 2020, reflecting elements of the pandemic recovery.

Figure 20 Carbon dioxide equivalent (CO<sub>2</sub>e) emissions from transport in London (in million tonnes), by transport sector, London Energy and Greenhouse Gases Inventory (LEGGI), 2013-2022.



Source: Greater London Authority.

### Carbon dioxide equivalent (CO<sub>2</sub>e) emissions per passenger kilometre on TfL services

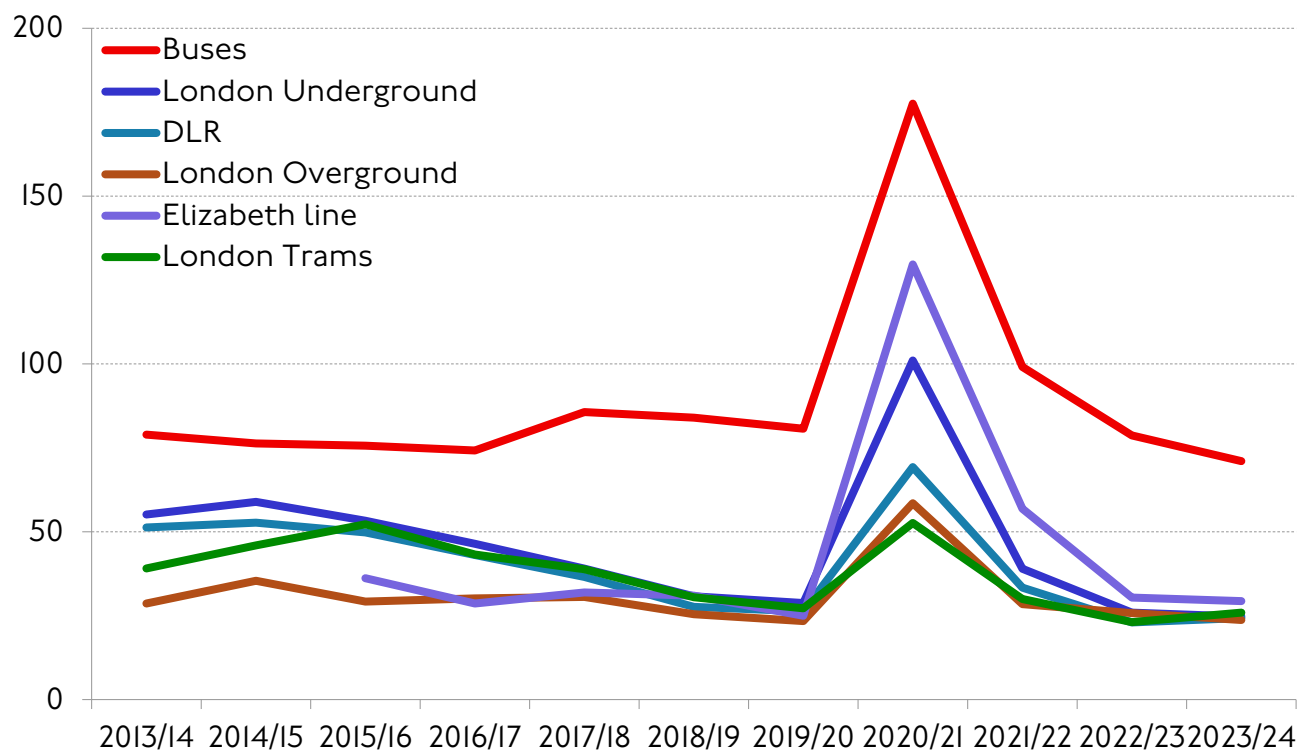
Figure 21 shows the carbon dioxide equivalent emissions by passenger kilometre for each TfL service over the last decade. During the 2023/24 financial year, bus services emitted the most (about 71g CO<sub>2</sub>e per passenger-km), compared to other services, which all emit within the range 20-30g CO<sub>2</sub>e per passenger-km.

Average emissions per passenger kilometre from bus and London Overground services have remained constant over the years, while the London Underground and DLR emission trends show a reduction of about 50 per cent in emissions, from 51-55g CO<sub>2</sub>e per passenger-km in 2013/14 to 25-30g CO<sub>2</sub>e per passenger-km in 2019/20 before the pandemic.

The impact of the coronavirus lockdowns is clearly visible during the 2020/21 financial year, with a peak in emissions for all TfL services, especially for buses (180g CO<sub>2</sub>e per passenger-km), the Elizabeth line (130g CO<sub>2</sub>e per passenger-km) and the London Underground (100g CO<sub>2</sub>e per passenger-km), as services continued operating with much lower passenger numbers. All services progressively reverted to their pre-pandemic emission levels over the last couple of years.

It is important to note that the carbon factor for electricity went up last year, which would have had the effect of holding back the decrease for certain modes.

Figure 21 Carbon dioxide equivalent (CO<sub>2</sub>e) emissions (grams per passenger kilometre) on TfL public transport services, 2013/14-2023/24.



Source: TfL Strategic Analysis, Customer & Strategy, based on TfL operational data.

### Electrifying the road vehicle fleet

The total number of electric vehicles (all classes) in London reached 205,000 in quarter 2 2024 (April to June), having risen from 192,400 in quarter 1 2024 (January to March) and 179,300 in quarter 4 2023 (October to December). There were 128,400 battery electric vehicles (BEV) in quarter 2 2024 (April to June), including 116,560 cars and 5,590 vans. Plug-in hybrid electric (PHEV) and range-extended electric vehicles (REEV) totalled 76,550.

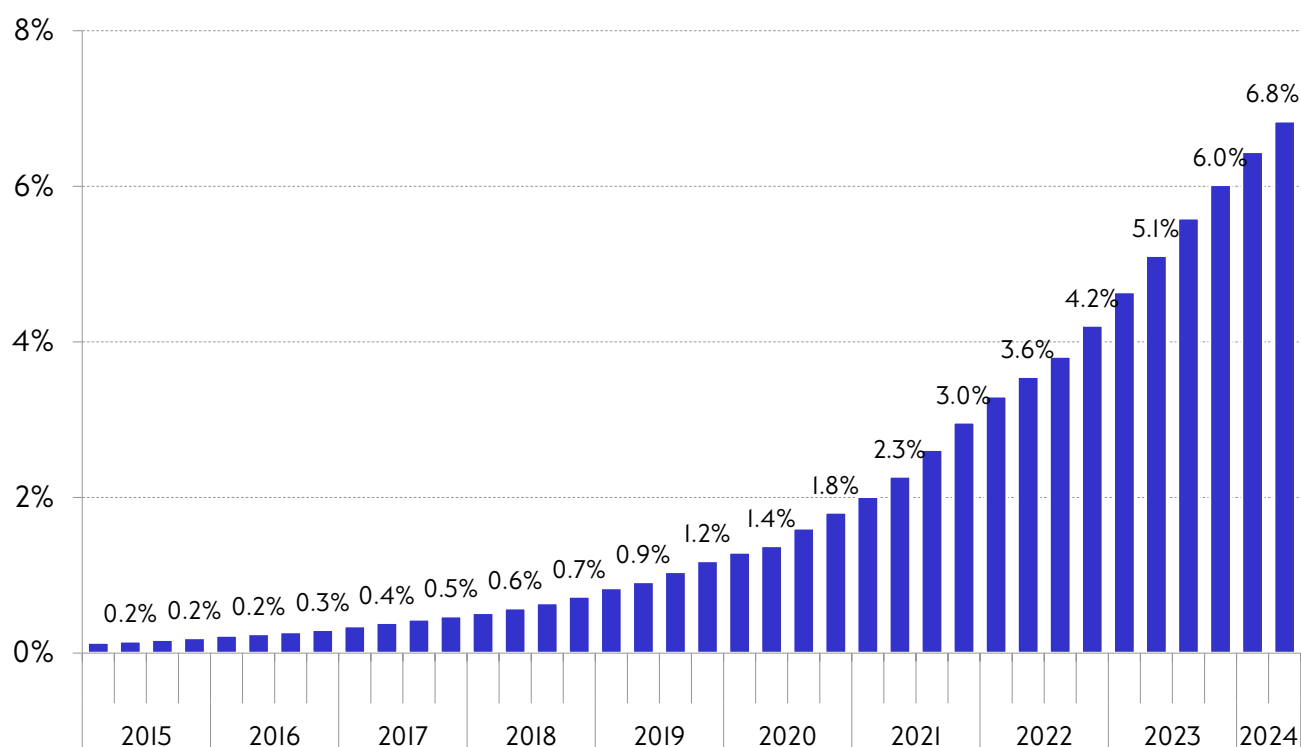
### Take-up of electric vehicles

In 2023, newly registered plug-in cars in London totalled 38,247, while newly registered plug-in vans totalled 844. Figure 22 shows the continuing growth in the proportion of

plug-in and battery electric (BEV, PHEV and REEV) vehicles among the total fleet of vehicles in London since 2015.

Recent news coverage of a fall in demand for new battery electric vehicles has been addressed by heavy discounting by vehicle manufacturers to incentivise sales. September is an important month for new car sales as it coincides with a change in the number plate sequence (74 plate). Nationally, the Society of Motor Manufacturers and Traders (SMMT) reports BEVs seeing a 20.5 percent market share in September 2024, while plug-in hybrids take 8.9 percent of the market. This trajectory of growth is insufficient to meet the Government’s Zero Emissions Vehicle Mandate, which could potentially mean significant fines for motor manufacturers. The SMMT is lobbying national Government for a package of measures to further stimulate sales of battery electric vehicles.

Figure 22 Proportion of plug-in vehicles registered in London, by quarter, quarter 1 2015 (Jan-Mar)-quarter 2 2024 (Apr-Jun).



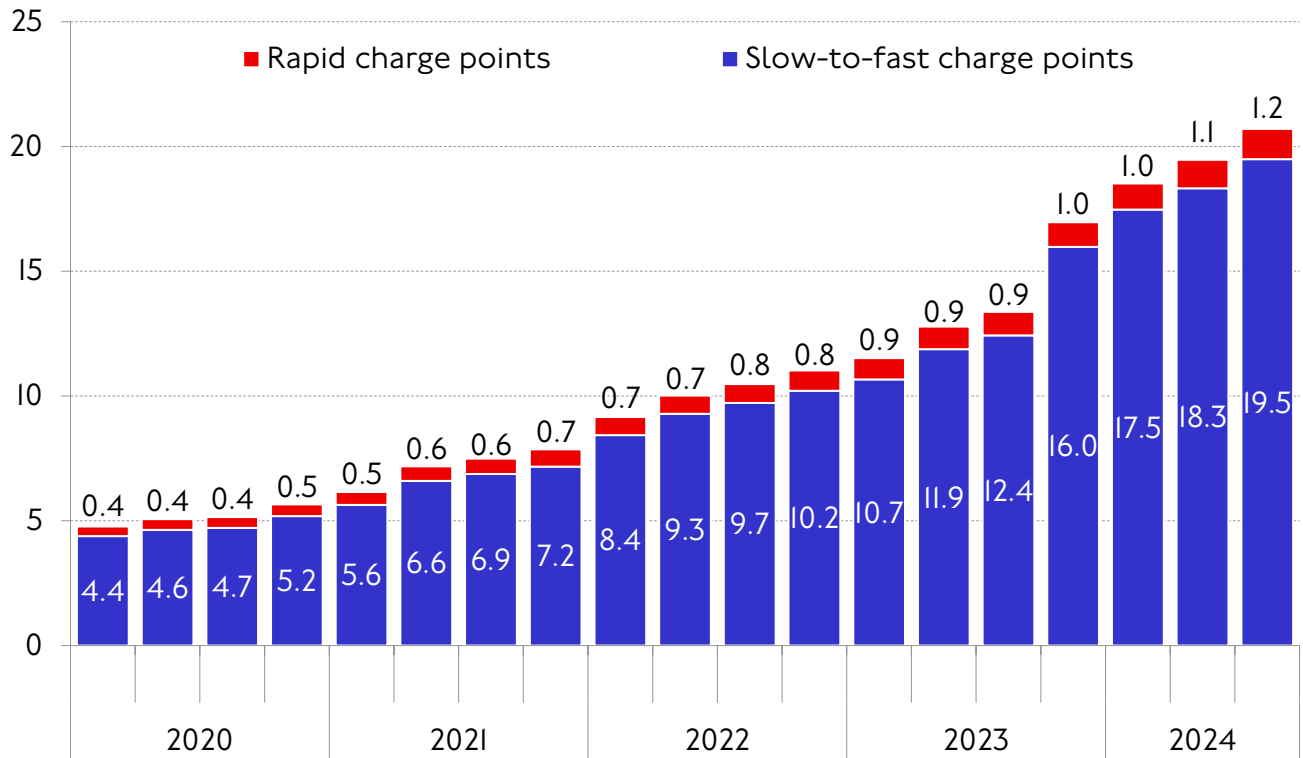
Source: Department for Transport.

### Provision of electric vehicle charging infrastructure

Providing suitable charging infrastructure is key to underpinning this transition. Our electric vehicle infrastructure strategy sets out that London will need between 40,000 and 60,000 public charge points by 2030. In October 2024, there were 21,658 public electric vehicle charging points in London, around one third of all public charging points in the UK, which is a 427 per cent increase in charging infrastructure since April 2020 (figure 23).

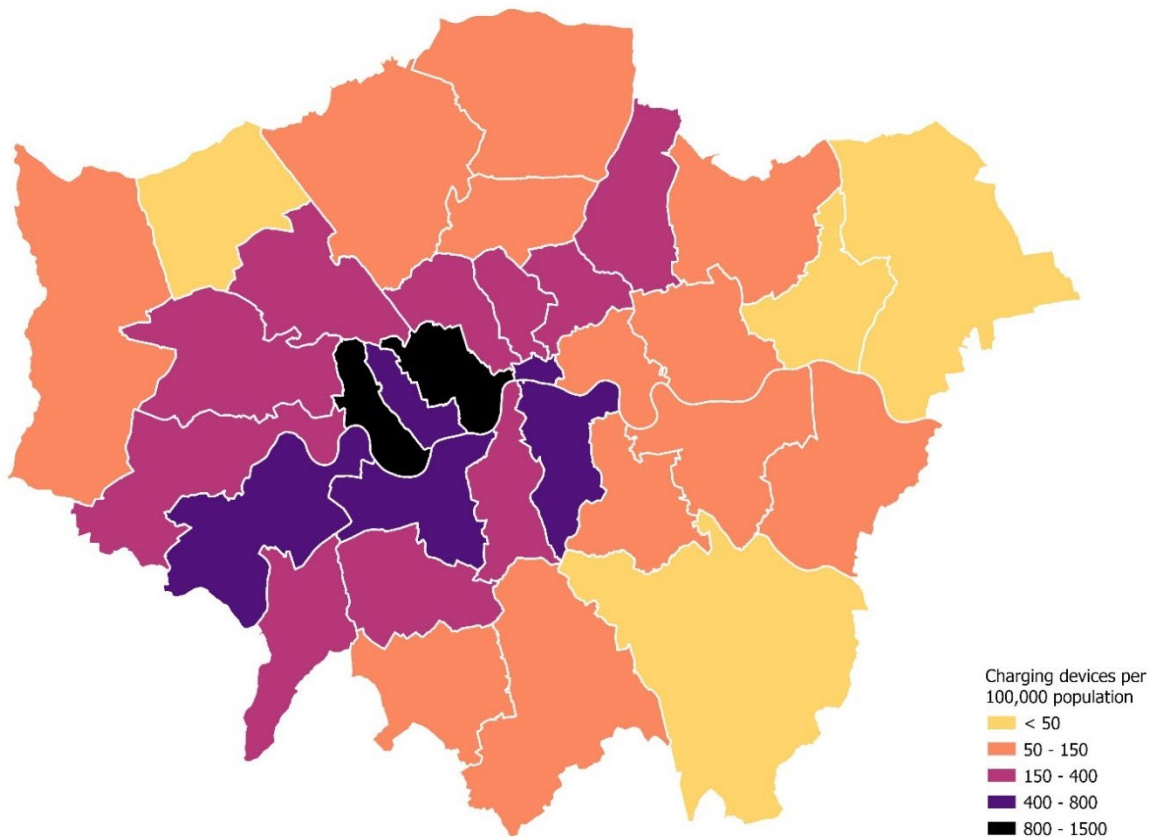
Despite this continuing progress, the distribution of public charging points exceeding 50kW across London is uneven. Figure 24 shows the average number of charging points per 100,000 population for each London borough. Although Greater London averages 234 devices per 100,000 people, compared to the UK average of 95.6 devices, the boroughs range from around 30 up to 1,437 devices per 100,000 people, with a clear bias towards inner-west London, showing the scope for improvement.

Figure 23 Electric vehicle charge points (in thousands), by type, by quarter, quarter 1 2020 (Jan-Mar)-quarter 3 2024 (Jul-Sep).



Source: Zapmap, via Department for Transport.

Figure 24 Distribution of electric vehicle charging points, by borough, July 2024.



Source: Zapmap, via Department for Transport.

## Zero-emission bus and taxi fleets

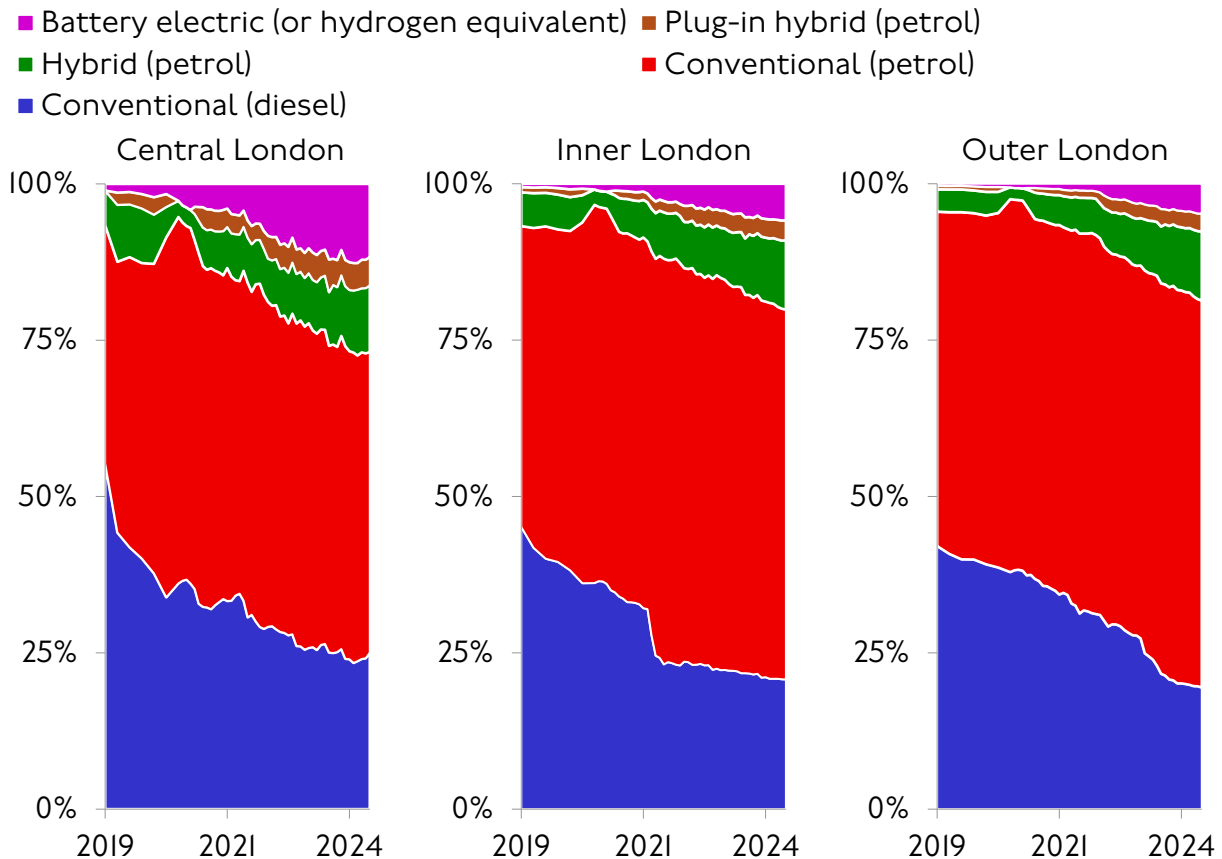
We are also continuing to expand our zero-emission bus fleet, and by October 2024 we had over 1,700 zero-emission buses on over 80 bus routes. The Mayor’s ambition is for London to have a fully zero-emission bus fleet by 2030.

London’s iconic and historic taxi trade is now leading the way in the early adoption of zero emissions-capable (ZEC) technology and, as a result, helping to reduce harmful emissions. As of October 2024, 60 per cent (nearly 8,700) of 14,600 taxis actively licensed by TfL on London’s roads were ZEC. The progress made to clean up the taxi fleet is significant and has come about largely through the introduction of strict licensing requirements. These licensing requirements were introduced in January 2018, and since then all taxis presented for licensing for the first time have needed to be ZEC.

We have taken a similarly ambitious approach with licensing requirements for private hire vehicles. This included introducing emissions-based licensing requirements in 2018. The latest requirement was introduced in January 2023, requiring all private hire vehicles licensed for the first time to be ZEC and to meet the Euro 6 emissions standards. As of October 2024, over a quarter (25 per cent) of the private hire fleet was ZEC (emitting under 75g·km<sup>-1</sup> of CO<sub>2</sub>) and nearly a quarter (23 per cent) was electric.

The increase in uptake of zero emission-capable vehicles across London has translated into an increase in battery electric vehicle (BEV) kilometres. The proportion of car kilometres, excluding private hire vehicles, by BEVs continued to increase in 2023 and 2024, with an average of approximately 12 per cent in central London, around five per cent in inner London and just over four per cent in outer London (figure 25).

Figure 25 Proportion of car kilometres, by engine technology, by area, 2019-2024.



Source: TfL Strategic Analysis, Customer & Strategy

BEV vans accounted for approximately eight per cent of total van vehicle kilometres in the same period in central London, around four per cent in inner London and just two percent in outer London. BEV PHVs accounted for over 30 per cent of all PHV kilometres in central London in 2024, with the share slightly lower in inner London.

## Road traffic

Despite rising population, road traffic volumes in London have been broadly stable over the last couple of decades. Towards the end of the last decade, however, traffic levels started to increase, particularly in outer London (which hosts over two thirds of London's traffic by distance driven) and in relation to certain types of vehicles, most notably vans.

During the pandemic, traffic volumes fell in line with restrictions but to a much lesser extent than public transport demand, reflecting long periods of working from home and the relative attractions of private transport in the pandemic context. Road traffic volumes also recovered much more rapidly once pandemic restrictions were eased. However, they also soon levelled out at just below pre-pandemic levels and have been relatively stable since.

### Overall trends in road traffic

The most comprehensive indicator of road traffic volumes in London is provided by the Department for Transport (DfT). [Travel in London report 15](#) described how this series was recently re-based, resulting in an increase to the vehicle kilometres assessed to have been driven in London relative to previous estimates from 2009. It is important to recognise that the revisions to the DfT's estimates were mostly due to methodological improvements in the calculation of benchmark estimates for 2009 and 2019, and not due to a change in observed year-on-year trends.

Figure 26 shows the revised long-term trend indexed to 2000. The relative stability of the amount of traffic in London through the early part of the period and increases around the end of the last decade are visible. Values for 2023 had still not yet recovered fully from the pandemic, with total traffic in London being five per cent lower than in 2019.

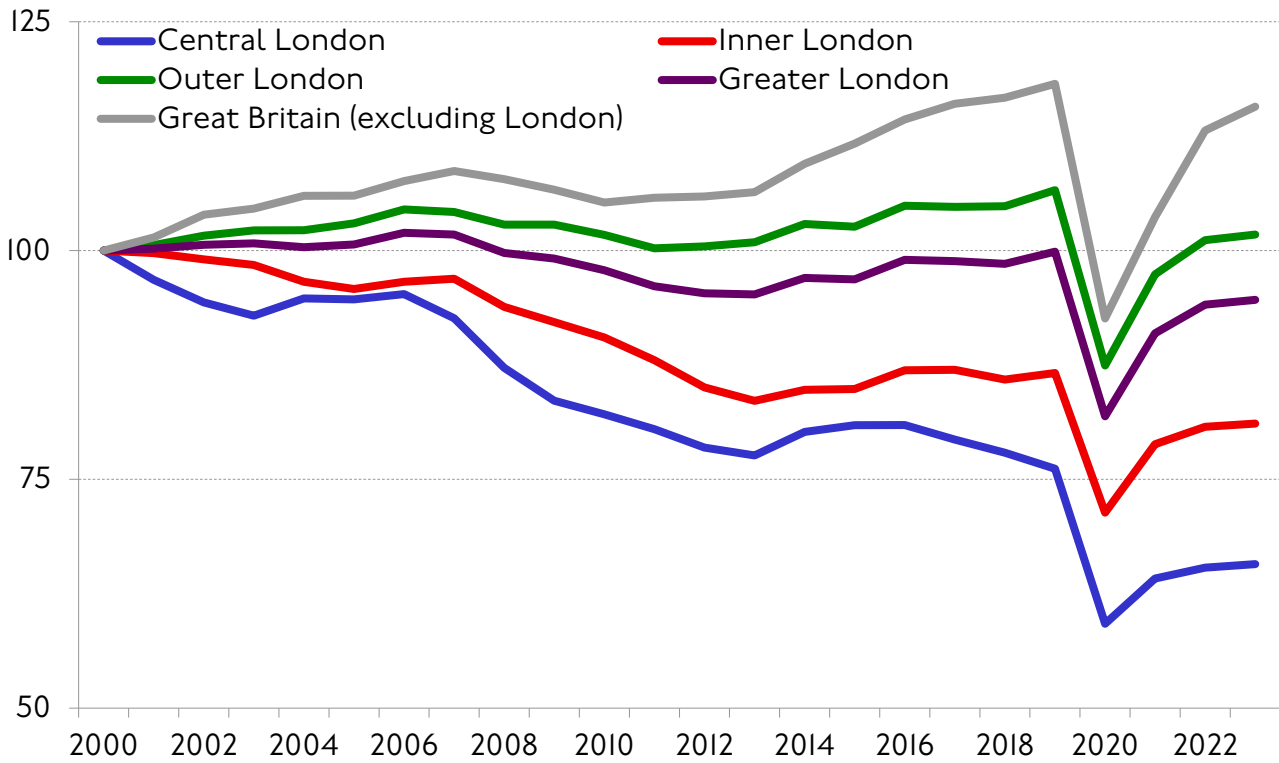
Of particular interest is the diverging trend in traffic growth between different areas of London. Traffic volumes in central London (using a definition different to, and larger than, the Congestion Charge zone) have fallen relatively consistently year on year, and in 2023 were 14 per cent below 2019 levels. The equivalent value for inner London was six per cent. Traffic volumes in outer London were five per cent below 2019 levels. Across London, the post-pandemic traffic recovery has been lower than in Great Britain.

By vehicle type, car traffic followed a similar trend to overall traffic, and is still seven per cent lower than in 2019. Following strong growth in light goods vehicle (LGV) traffic between 2010 and 2015, LGV traffic remained at the same level between 2015 and 2019. Following the pandemic, LGV traffic was eight per cent lower in 2023 than in 2019.

Another measure of traffic trends is given by TfL's counting cordons around central (again, a definition larger than, and not aligned to, the Congestion Charge zone), inner and outer London. This data contributes to a Mayor's Transport Strategy Tracker metric and is shown in figure 27, with an aim to reduce the number of car journeys by three million on an average day by 2041. Although these are less-comprehensive measures than those provided by the DfT, the long-term picture is broadly similar.

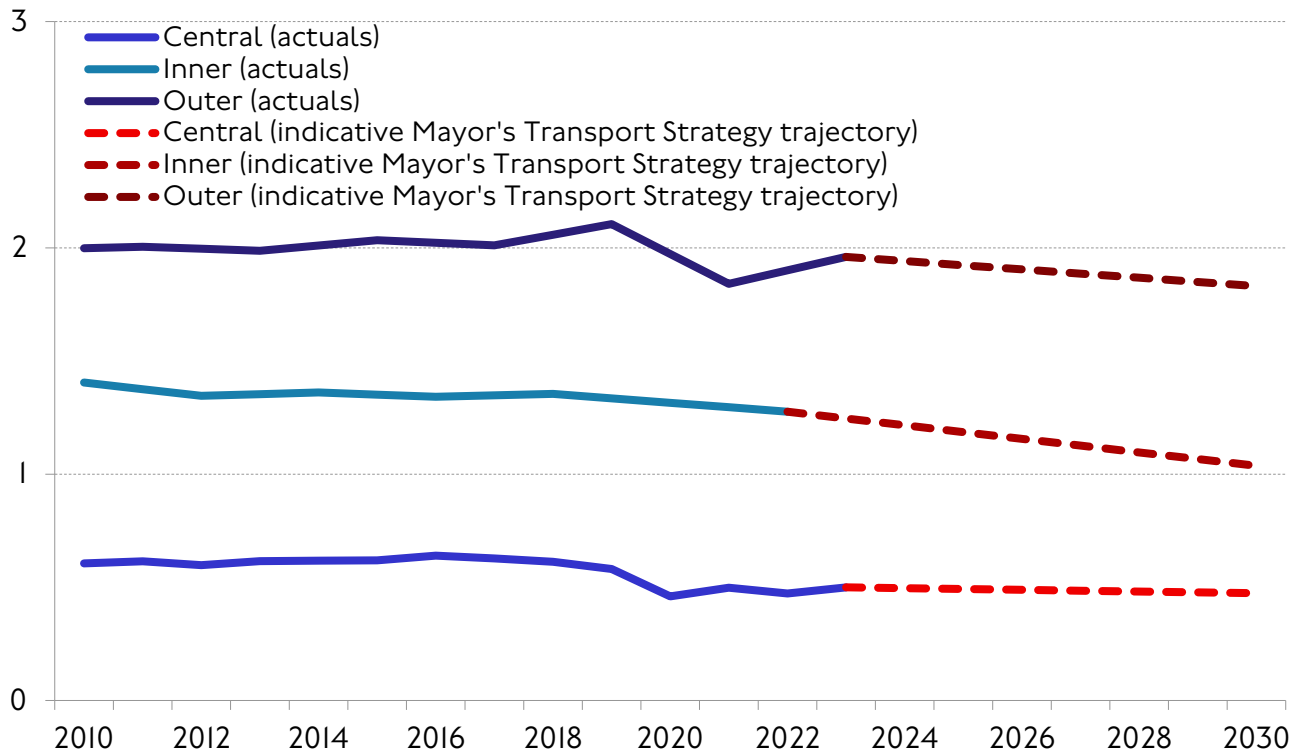


Figure 26 Change (index: 2000 = 100) in vehicle kilometres driven by motorised modes, by London area and Great Britain, 2000-2023.



Source: Department for Transport.

Figure 27 Cars (in millions) crossing London's strategic cordons per day, 2010-2030.



Source: TfL Strategic Analysis, Customer & Strategy, based on TfL traffic data.

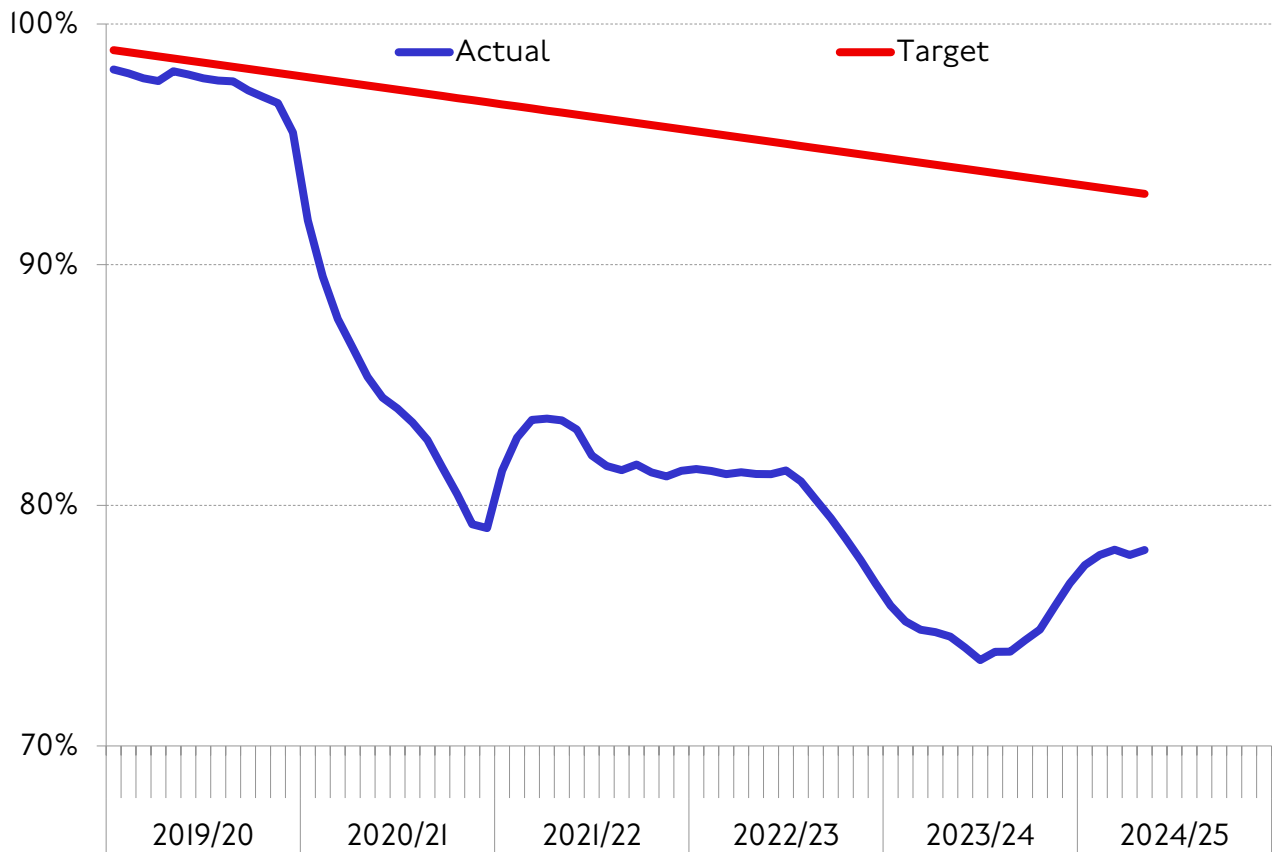
Note: The inner and outer cordon counts take place every other year in alternate years, with intermediate values interpolated. Due to the coronavirus pandemic, there were no inner cordon counts in 2020 or 2021 (interpolated from 2018 and 2022) and no outer cordon counts in 2020 (interpolated from 2019 and 2021).

## Freight vehicles entering central London in the weekday morning peak

A specific aim of the Mayor’s Transport Strategy is to reduce the number of goods vehicles (both heavy and light goods vehicles) circulating in the central London Congestion Charge zone during the weekday morning peak by 10 per cent from 2016 levels, by 2026. This reflects pressures on the road network at this time and would help to reduce road danger.

Figure 28 shows the observed trend over recent years and sets this in the context of the nominal trajectory required to meet the target. The impact of the pandemic is clearly visible but, as traffic recovered, the number of freight vehicles remained well below the 2026 target. Following a further period of decrease in 2023, the number of freight vehicles entering central London in the weekday morning peak increased during 2024 but remained well below the target value.

Figure 28 Change (from 2016) in freight vehicles entering the Congestion Charge zone, 13-period moving average, period 1 2019/20–period 5 2024/25.



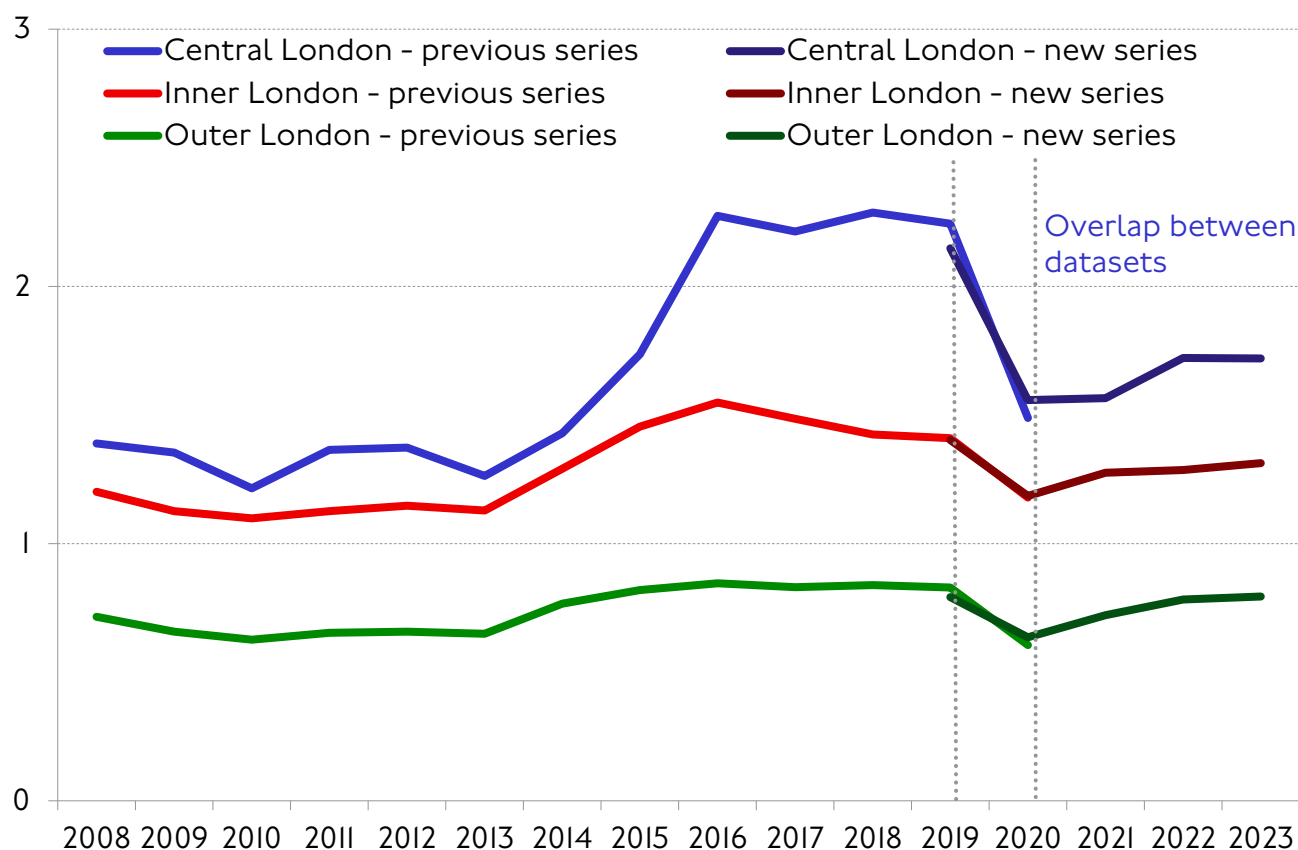
Source: TfL Strategic Analysis, Customer & Strategy, based on TfL traffic data.

## Road traffic congestion

[Travel in London report 15](#) described how a re-basing of the DfT’s congestion dataset had interrupted the continuity of the long-term time series, with the previous series running until 2020 and the new series starting from 2019. Congestion is conventionally defined in terms of a travel rate (minutes per kilometre) over and above that which might be expected if the network operated under free-flow conditions (for practical reasons, this is taken as the night-time period); that is, an excess delay.

Figure 29 shows a re-based long-term trend for congestion by area of London. While the absolute values between the two data sources should not be regarded as strictly comparable, the long-term trends are of interest. They show a sustained rise in congestion in all parts of London during the years leading up to the pandemic. Following reductions associated with the pandemic, with lower traffic levels, the trend over more recent years has been slowly upward. It is not yet clear from the available time series of data whether the relatively lower values shown by the more recent dataset are reflective of lower overall road traffic demand following the pandemic or recent operational initiatives designed to better manage congestion.

Figure 29 Morning peak average weighted road vehicle excess delay (in minutes per kilometre), by area, 2008-2023.



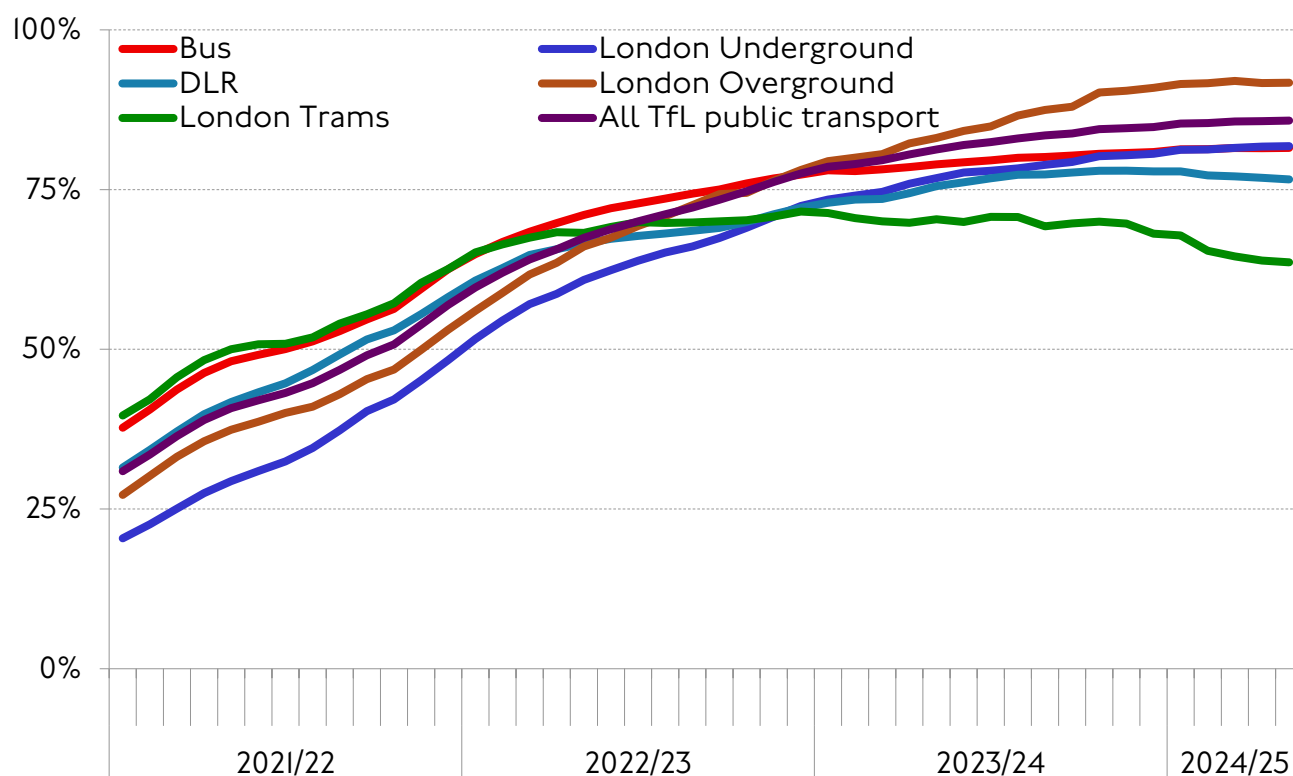
Source: TfL Operational Analysis, Network Performance.

# A good public transport experience

## Public transport demand and operational performance trends

Public transport demand has continued to recover following the coronavirus pandemic, although unevenly (relative to pre-pandemic conditions) over days of the week and times of the day. The latest position for each TfL mode, relative to the pre-pandemic baseline, is shown in figure 30.

Figure 30 Passenger journeys recovery (from the 2019/20 baseline) on the main TfL public transport modes, by financial period, 13-period moving average, period 1 2021/22-period 5 2024-25.



Source: TfL Strategic Analysis, Customer & Strategy, based on TfL service performance data.

Notes: The Elizabeth line is not shown separately but its demand is included in the 'All TfL public transport' series. | Period 5 2024/25 figures are early estimates and therefore subject to change.

At an aggregate level for the whole year, in 2023/24 there were 3.6 billion journeys across London's main public transport modes, a 9.4 per cent increase from 3.3 billion journeys in 2022/23. This was still below the level of the last pre-pandemic year (2019/20), at 93 per cent, and furthermore the pace of recovery slowed in 2024 relative to prior expectation.

This aggregate trend conceals the fact that the Elizabeth line opened in 2022 and would have attracted many new journeys not previously seen on TfL's public transport networks. A more detailed analysis of total journeys on individual modes, as an average for 2023/24, therefore shows levels of shortfall from the pre-pandemic baseline of between 3 and 15 per cent. For London Underground, the representative recovery percentage as an average in 2023/24 was 88 per cent. For buses, it was 89 per cent.

The Elizabeth line, which opened in May 2022, continued to grow strongly, with a 53.9 per cent increase in journeys in the year to 2023/24. London River Services (up by 13 per cent)

and the IFS Cloud Cable Car (up by 4.5 per cent) both also showed significant patronage growth during 2023/24. Finally, the Office of Rail and Road reports that rail journeys on London and South East franchised National Rail operators (which include a certain amount of travel that does not take place strictly within or across the London boundary) recovered to around 1.1 billion journeys (95 per cent of the pre-pandemic baseline) in 2023/24.

### Post-pandemic recovery to the 2023/24 financial year by mode

Table 5 shows the trend in journeys on TfL's public transport modes for the last decade.

**Table 5** Journey stages (millions) on TfL's public transport modes, 2013/14-2023/24.

Year	Buses	LU	DLR	LO <sup>1</sup>	EL <sup>1,2</sup>	Trams	Total <sup>3</sup>	River Services	IFS Cloud Cable Car
2013/14	2,382	1,265	102	136	-	31	<b>3,916</b>	8.4	1.5
2014/15	2,385	1,305	110	140	-	31	<b>3,972</b>	10.0	1.5
2015/16	2,314	1,349	117	183	37	27	<b>4,028</b>	10.2	1.5
2016/17	2,262	1,378	122	189	45	30	<b>4,025</b>	10.4	1.5
2017/18	2,247	1,357	120	190	42	29	<b>3,985</b>	10.0	1.4
2018/19	2,220	1,385	122	188	51	29	<b>3,995</b>	9.8	1.4
2019/20	2,112	1,337	117	186	56	27	<b>3,835</b>	9.6	1.2
2020/21	865	296	40	59	18	12	<b>1,290</b>	1.6	0.4
2021/22	1,491	748	77	127	37	19	<b>2,499</b>	5.3	1.4
2022/23	1,785	1,065	92	157	143	21	<b>3,263</b>	8.5	1.5
2023/24	1,870	1,181	99	181	220	20	<b>3,571</b>	9.6	1.6
Change 2022/23-2023/24	4.8%	10.9%	7.2%	15.5%	53.9%	-4.5%	<b>9.4%</b>	13%	4.5%

Source: TfL Strategic Analysis, Customer & Strategy, based on Office of Rail and Road and TfL service performance data.

Note: On all modes except London Overground, a 'journey stage' is a leg of a whole trip by a single mode without additional validation. For example, a trip involving two buses would generate two bus journey stages; but a trip using two lines on the same rail mode without crossing barriers would generate only one journey stage. On London Overground, each train boarding is counted as a separate journey stage.

1: The London Overground and Elizabeth line figures are Office of Rail and Road estimates based on ticket sales, with known limitations especially for the Elizabeth line, so they should be considered only indicative.

2: The Elizabeth line opened in May 2022 so the results up to 2021/22 refer to the former TfL Rail services.

3: This total excludes River Services and the IFS Cloud Cable Car.

- On **buses**, the number of journey stages in 2023/24 recovered to 89 per cent of the pre-pandemic baseline.
- **London Underground** journeys stages in 2023/24 were at 88 per cent of the pre-pandemic baseline.
- On the **DLR**, journey stages in 2023/24 were 85 per cent of the pre-pandemic baseline.

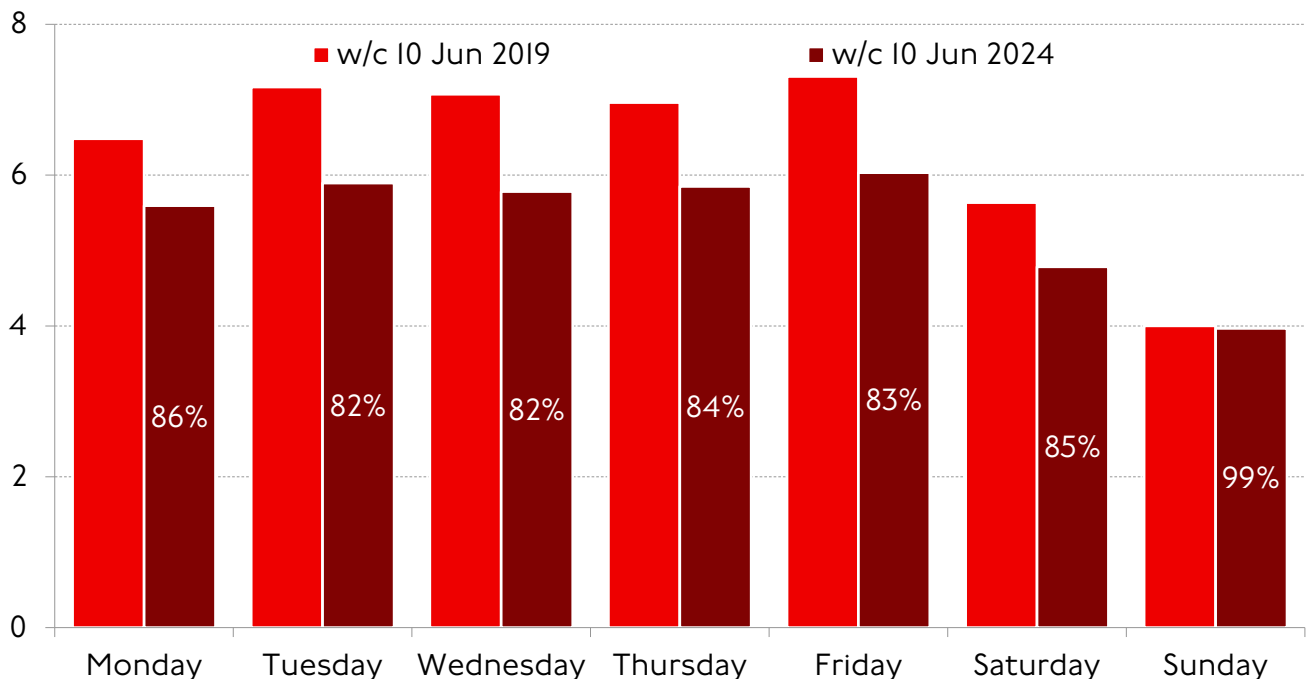
- On **London Overground**, journey stages had recovered to 97 per cent of the pre-pandemic baseline in 2022/23.
- **London Trams** journey stages were at 73 per cent of the pre-pandemic baseline in 2023/24.
- On **London River Services**, the number of journey stages recovered to 100 per cent of the pre-pandemic baseline.
- Finally, the **IFS Cloud Cable Car** saw 31 per cent more journeys in 2023/24 than before the pandemic.

### Changes in the distribution of travel demand throughout the week and the day

While changes to the timing (within the week and the day) and location of public transport journeys were a key feature of the earlier stages of the pandemic recovery, the latest data from 2023/24 suggests that these are tending to slowly dissipate over time, although an uneven recovery and preference for certain days of the week is still apparent on some modes (notably the London Underground and to a lesser extent buses).

Figure 31 shows London bus demand by day of the week for a representative week in spring 2024, compared to the equivalent week in 2019 before the pandemic. The proportion of the pre-pandemic baseline for each day is also shown for reference.

Figure 31 Bus journey stages (in millions) by day of the week, week commencing 10 Jun 2019 versus week commencing 10 Jun 2024.



Source: TfL Strategic Analysis, Customer & Strategy, based on TfL service performance data.

Note: On buses, each boarding (even within the same trip) is counted as an additional 'journey stage'.

The overall pattern of relative patronage across the different days of the week in 2024 was broadly similar to before the pandemic. The recovery of bus demand was also relatively even, with proportions between 82 and 86 per cent across all days of the week except Sunday, at 99 per cent on this representative week.

Table 6 shows the state of the pandemic recovery for buses by time of day and day of the week at a representative week in spring 2024.

Table 6 Bus demand recovery by time of day and day of the week, 16-22 Mar 2024 versus 16-22 Mar 2019.

Time	Mon	Tue	Wed	Thu	Fri	Sat	Sun
Early morning (04:00-07:00)	91%	90%	90%	92%	89%	104%	112%
Morning peak (07:00-10:00)	78%	79%	82%	80%	76%	97%	98%
Early inter-peak (10:00-13:00)	88%	89%	91%	90%	90%	93%	85%
Late inter-peak (13:00-16:00)	87%	88%	89%	89%	88%	97%	89%
Evening peak (16:00-19:00)	82%	84%	84%	85%	83%	97%	100%
Evening (19:00-22:00)	86%	88%	127%	92%	92%	100%	108%
Late evening (22:00-01:00)	96%	98%	123%	105%	95%	107%	112%
<b>Whole day</b>	<b>84%</b>	<b>86%</b>	<b>90%</b>	<b>87%</b>	<b>86%</b>	<b>97%</b>	<b>96%</b>

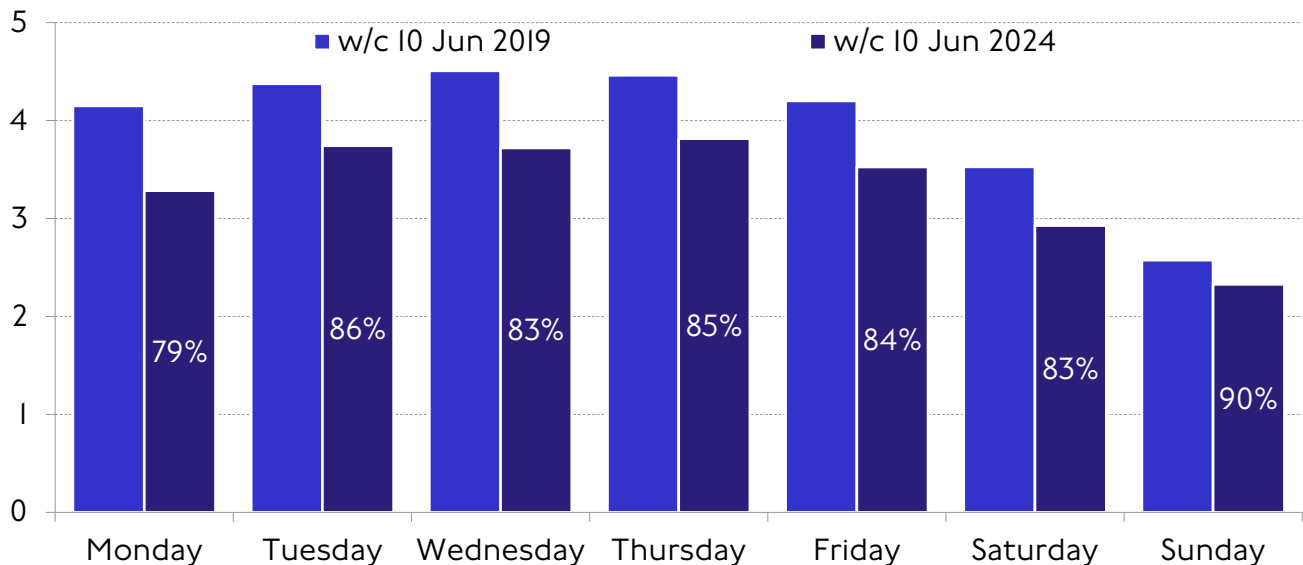
Source: TfL Public Transport Service Planning.

Note: The underlying data includes Oyster and contactless payment but not paper tickets.

The recovery was least advanced in the Monday and Friday morning peaks (at 78 and 76 per cent, respectively), although this was still relatively higher than the level seen on London Underground (see table 7 in the next section), most likely due to school-related trips. Weekends had recovered the most, although in absolute terms they remain materially less busy than weekdays.

Figure 32 shows London Underground demand by day of the week for a representative week in spring 2024, compared to the equivalent week in 2019 before the pandemic. The proportion of the pre-pandemic baseline for each day is also shown for reference.

Figure 32 London Underground journey stages (in millions) by day of the week, week commencing 10 Jun 2019 versus week commencing 10 Jun 2024.



Source: TfL Strategic Analysis, Customer & Strategy, based on TfL service performance data.

Note: On London Underground, a 'journey stage' is a leg of the trip with no additional validation. Hence, one journey stage may involve several lines when the interchange does not require crossing barriers. However, any 'out-of-station' interchange where validation is required is counted as a new journey stage.

Although the overall pattern of relative patronage across the different days in 2024 for the London Underground was broadly similar to before the pandemic, the recovery proportions ranged more widely, from 79 per cent on Monday to 90 per cent on Sunday.

Table 7 shows the state of the pandemic recovery for the London Underground by time of day and day of the week for a representative week in spring 2024.

**Table 7** London Underground demand recovery by time of day and day of the week, 16-22 Mar 2024 versus 16-22 Mar 2019.

Time	Mon	Tue	Wed	Thu	Fri	Sat	Sun
<b>Early morning (04:00-07:00)</b>	76%	77%	76%	77%	74%	83%	87%
<b>Morning peak (07:00-10:00)</b>	70%	79%	79%	79%	62%	88%	91%
<b>Early inter-peak (10:00-13:00)</b>	85%	89%	90%	90%	86%	98%	96%
<b>Late inter-peak (13:00-16:00)</b>	89%	91%	90%	91%	88%	96%	91%
<b>Evening peak (16:00-19:00)</b>	77%	85%	83%	85%	76%	102%	95%
<b>Evening (19:00-22:00)</b>	75%	81%	84%	88%	82%	98%	93%
<b>Late evening (22:00-01:00)</b>	97%	97%	96%	101%	91%	107%	94%
<b>Whole day</b>	<b>78%</b>	<b>84%</b>	<b>84%</b>	<b>86%</b>	<b>78%</b>	<b>98%</b>	<b>94%</b>

Source: TfL Public Transport Service Planning.

Note: The underlying data includes Oyster and contactless payment but not paper tickets.

As with buses, the recovery was least advanced in the Monday and Friday morning peaks (at 70 and 62 per cent, respectively). In absolute terms Tuesday and Thursday evening peaks were the busiest three-hour periods. Saturday had recovered the most overall in percentage terms, but in absolute terms remained less busy than Mondays and Fridays.

### Service provision and operational performance

Public transport service provision was maintained at a relatively high level on TfL services during the pandemic and recovered quickly afterwards. More recently, however, the negative impacts of deferred asset renewal have begun to be felt, with restrictions to service provision on both the Central and Bakerloo lines, alongside staff availability issues and the resurgence of road traffic congestion affecting bus speeds and reliability.

The roots of these issues can be traced back to the disruptive effect of the coronavirus pandemic and there is a danger of continuing deterioration in the future. The Elizabeth line and London Trams experienced particular reliability challenges in 2023/24, reflecting specific infrastructure issues, the former largely related to Network Rail infrastructure issues on the western branch towards Heathrow and Reading.

In terms of service provision and performance, the year 2023/24 saw improvements relative to 2022/23 on most operator-focused metrics but these were not reflected for all modes on passenger-focused metrics and some key indicators remained below their representative pre-pandemic values. Table 8 provides a summary of key performance indicators. From 2022/23 to 2023/24, the proportion of train kilometres operated on the London Underground increased by 2.5 percentage points to 90.8 per cent of the scheduled kilometres; and by 0.9 percentage points on buses, to 96.9 per cent.



Table 8 Selected performance indicators on the main TfL-operated public transport modes, 2013/14-2023/24.

Year	Buses: kilometres operated	LU: kilometres operated	DLR: services operated	Trams: services operated	LO: PPM <sup>1</sup>	EL: PPM <sup>1</sup>
2013/14	97.7%	97.5%	99.2%	98.9%	95.8%	-
2014/15	97.1%	97.6%	99.3%	97.9%	95.0%	-
2015/16	97.2%	97.5%	98.5%	99.0%	94.4%	91.4%
2016/17	97.4%	96.9%	99.0%	97.1%	94.5%	91.8%
2017/18	98.1%	96.6%	98.4%	98.5%	94.4%	89.8%
2018/19	98.1%	96.8%	99.0%	98.5%	93.8%	93.8%
2019/20	97.8%	94.0%	99.0%	98.2%	92.6%	95.2%
2020/21	98.7%	87.2%	99.3%	98.3%	96.2%	96.0%
2021/22	97.9%	88.2%	98.5%	98.5%	95.2%	94.2%
2022/23	96.0%	88.3%	98.3%	92.2%	93.5%	92.8%
2023/24	96.9%	90.8%	98.3%	93.6%	93.6%	88.0%
Change 2022/23-2023/24	+0.9pp <sup>2</sup>	+2.5pp	0pp	+1.4pp	+0.1pp	-4.8pp

Source: TfL Strategic Analysis, Customer & Strategy, based on Office of Rail and Road and TfL service performance data.

1: Annual average of the Public Performance Measure (PPM), which is a metric that combines punctuality and reliability to represent the proportion of all scheduled trains that are 'on time', which for operators in the London and South-East region means arriving at the destination no later than five minutes after the scheduled arrival time.

2: Percentage points.

## Connectivity

### Access to bus services

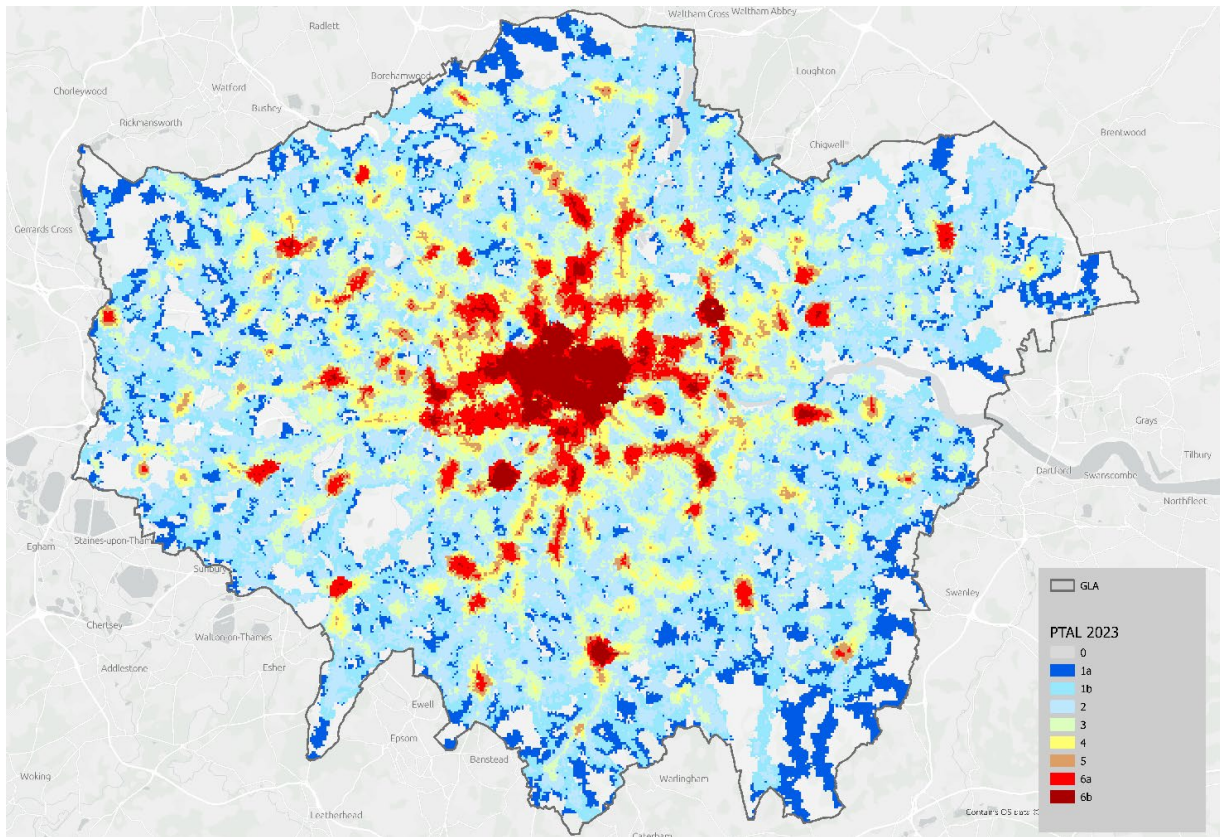
The key connectivity metric we use for public transport is the proportion of Londoners living within 400 metres of a bus stop, which represents the ability of Londoners to access bus services within five minutes of where they live. The Mayor's aim is to maintain this broadly at the high level of 96.5 per cent seen in 2016. Re-calculation of this measure using population data for 2024 shows a slight increase in the proportion of Londoners meeting this criterion, to 96.7 per cent.

### Public transport access level (PTAL)

Our public transport access level (PTAL) metric provides a wider measure of Londoner's access to public transport. The familiar pattern of relatively higher connectivity towards

inner and central London, town centres and along radial rail lines is visible. As of October 2024, 33 per cent of London’s population lived in areas with a PTAL connectivity score of four or above, which is considered to represent ‘high’ connectivity. This is identical to the value for 2023. Figure 33 shows London PTAL as of autumn 2023.

Figure 33 Public transport access level (PTAL) in London, autumn 2023.



Source: TfL Strategic Analysis, Customer & Strategy.

## Public transport safety

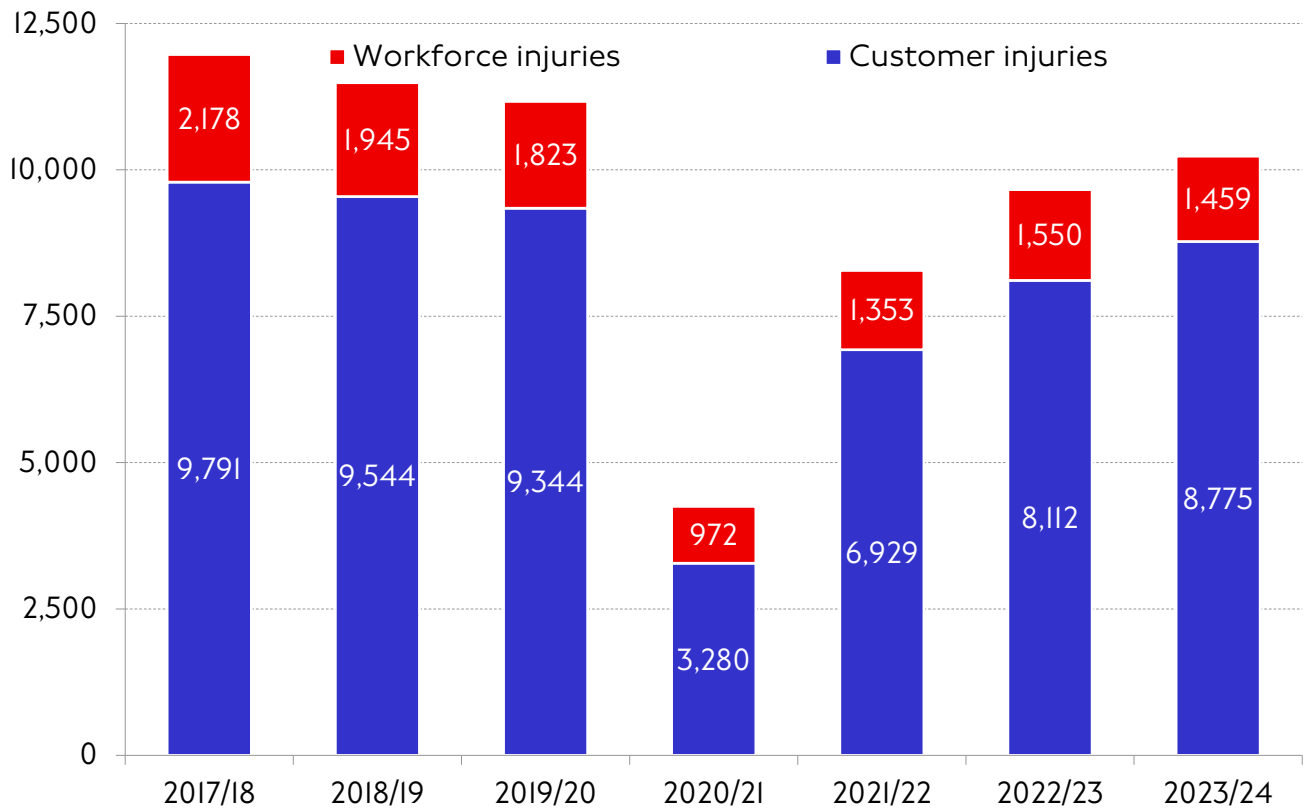
### Customer and workforce injuries

Although millions of journeys are made safely every day, in 2023/24 there were 8,775 customer injuries and 1,459 injuries among our workforce, both of which remain lower than before the pandemic (figure 34).

Figure 35 shows that in 2023/24 there were 219 customer and workforce killed or seriously injured casualties. Nine people (eight customers and one colleague) lost their lives on our public transport network in the 2023/24 financial year. There were 193 serious injuries sustained by our customers and 17 by colleagues on the network. This represents a decrease in the number of customers and colleagues killed or seriously injured compared to the previous financial year and shows that we are broadly in line with the reduction required to meet the Mayor’s Transport Strategy Vision Zero target by 2041.

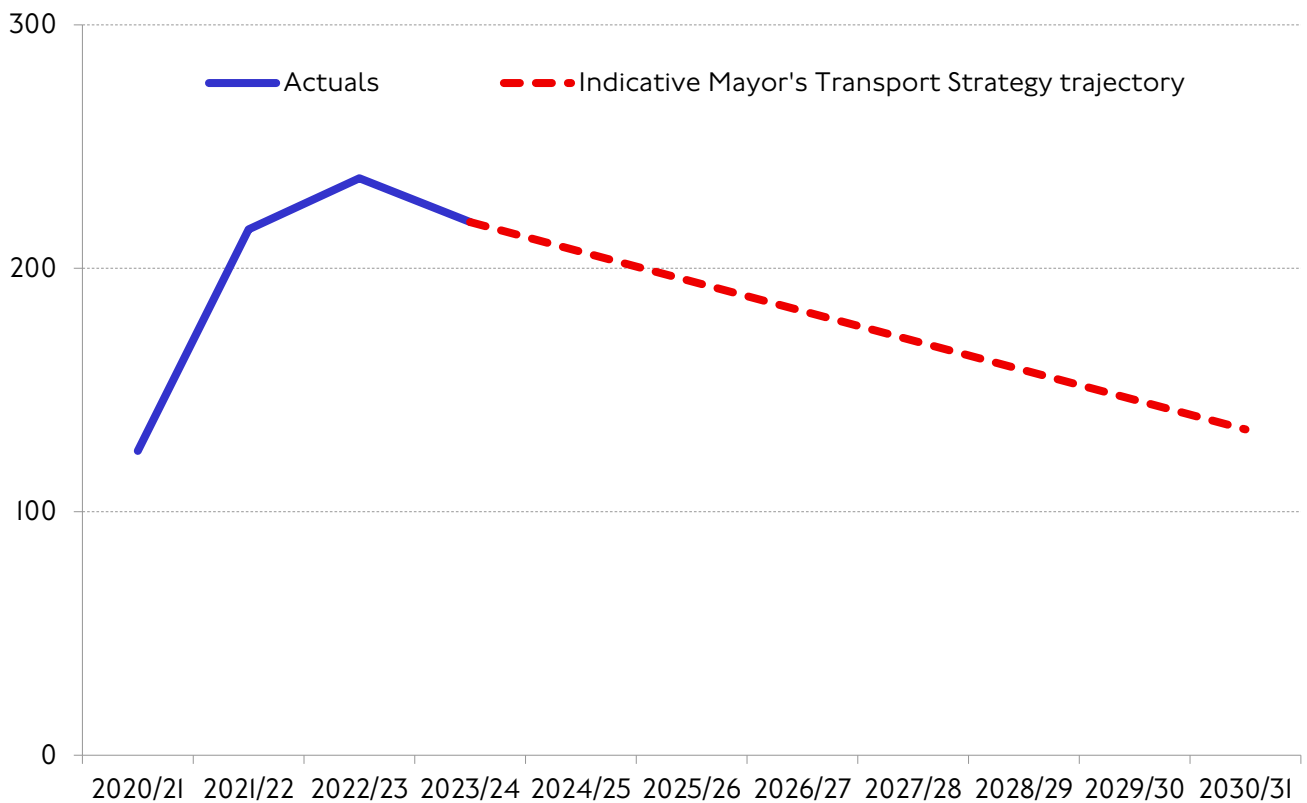
To achieve the Mayor’s ambition of eliminating all deaths and serious injuries on London’s transport network by 2041 we are prioritising action on those risks that lead to the greatest number of injuries and harm. We are also working to improve controls and operational processes that prevent harm from occurring.

Figure 34 Customer and workforce injuries (all severities), 2017/18-2023/24.



Source: TfL Insights & Direction, Safety, Health & Environment.

Figure 35 Killed or seriously injured customer and workforce casualties, 2020/21-2030/31.



Source: TfL Insights & Direction, Safety, Health & Environment.

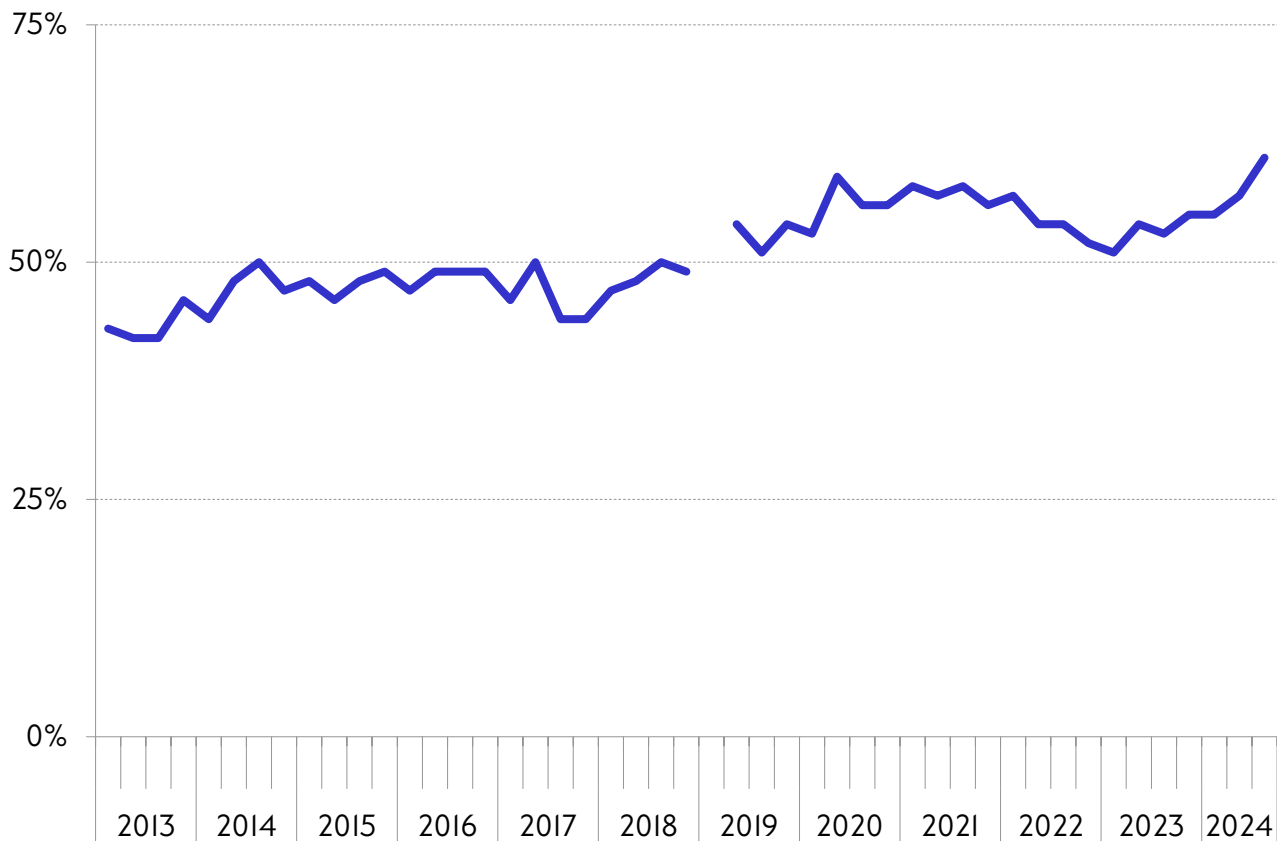
## Customer Care

Care and customer satisfaction are our primary measures for understanding the quality of the customer experience that TfL delivers, from a customer perspective. They are complementary elements in determining how TfL is working for our customers, providing a rounded picture of our performance.

'TfL cares about its customers' is the measure used to understand whether TfL is meeting expectations and making Every Journey Matter for our customers. Care measures Londoners' overall perceptions of TfL and is the best reflection of how TfL meets expectations in every interaction with customers (for example all journeys, interactions with the Contact Centre and communications such as email updates), not just the last journey. A continuing focus on Care helps TfL understand, in the short-term, how TfL works for our customers, and in the longer term, how to encourage greater use of active, efficient and sustainable modes.

Our key Care measure performed well throughout the pandemic, with quarterly results lying in the high 50 per cent of Londoners agreeing that 'TfL cares about its customers' (figure 36). Since the pandemic, the score has been suppressed by customers adjusting to the increased busyness of the network following a period of lower public transport use, a period of sustained industrial action and the launch of the ULEZ expansion. External factors such as the cost-of-living crisis also contributed to lower scores. At the start of 2024/25 the Care score returned to and exceeded pre-pandemic levels, as industrial action has eased, and operational performance stabilised.

Figure 36 Agreement with 'TfL cares about its customers' (Care score), by quarter, quarter 1 2013 (Jan-Mar)-quarter 3 2024 (Jul-Sep).



Source: TfL Customer Insight, Customer & Strategy.

Note: The series break in 2018/19 reflects a change of data supplier.

## Physical accessibility

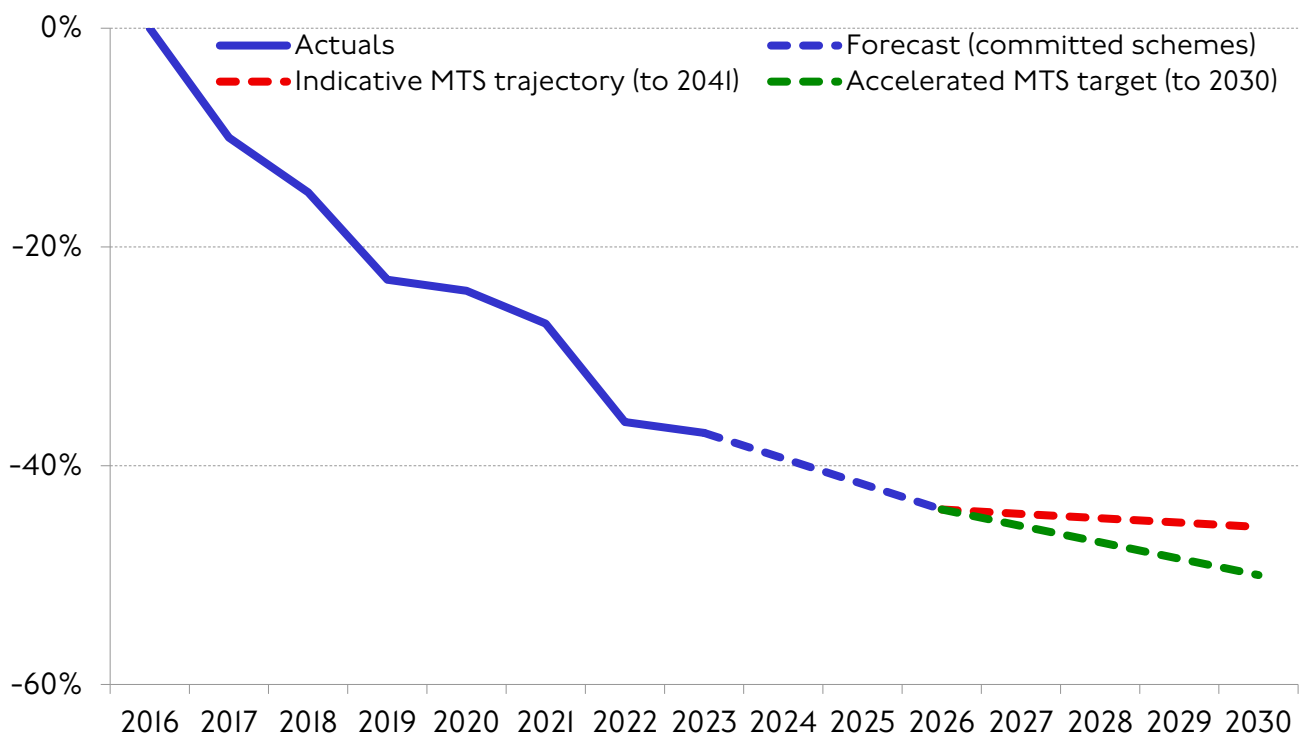
Improving the physical accessibility of public transport is key to creating a fully inclusive network for all. People who are older or disabled or who are travelling with luggage or young children can sometimes find it hard to get around and often face longer journeys if they are only able to use the step-free network.

The Mayor's Transport Strategy aims to reduce this journey time differential, with a working aim of a 50 per cent reduction from a 2016 baseline by 2041. Despite funding challenges, we are ahead of trajectory to meet this target. We have therefore set a stretch target to achieve the 2041 ambition by 2030 (figure 37).

Today, more than a third of London Underground stations across the city provide step-free access, with the Mayor's ambitious goal set at making 50 per cent of London Underground stations step-free by 2030.

In the context of rapid progress in recent years however, there were no new additions to the step-free network in 2024. Knightsbridge London Underground station is the next step free station set to open in 2025.

Figure 37 Reduction (from the 2016 baseline) in the additional journey time using only the step-free transport network, 2016-2030.

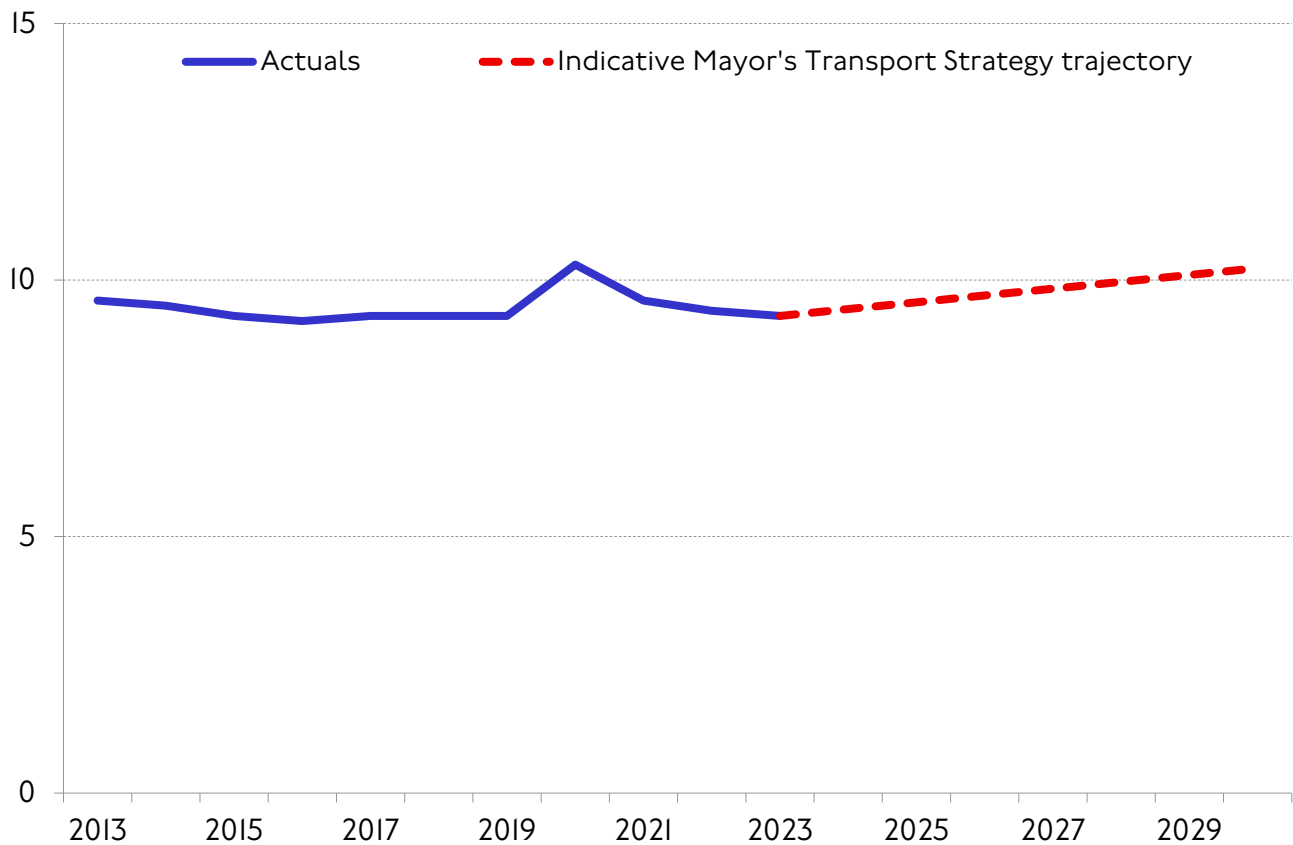


Source: TfL Strategic Analysis, Customer & Strategy.

## Bus speeds

Bus speeds are a key indicator for perceived quality of service and are increasingly affected by general traffic congestion. Figure 38 shows a historical trend of slow decline. While bus speeds increased during the pandemic because of lower traffic levels, in the years since 2020 bus speeds have returned to 2019 pre-pandemic levels. The average bus speed in 2023/24 was 9.3 miles per hour, a small reduction of one per cent on 2022/23.

Figure 38 Average London bus network speed (in miles per hour), 2013-2030.



Source: TfL Strategic Analysis, Customer & Strategy, based on TfL service performance data.

A more holistic measure of bus performance is based on a generalised journey time metric that reflects the customers' perception of the average time taken to make a journey, including waiting, travel and interchange times, also considering crowding and bus journey time variability. The value of this metric in 2023/24 was 34.0 minutes, slightly higher than the target of 33.9 minutes.

Falling bus speeds are driven by delays and incidents associated with the impact of street works, traffic congestion, staff shortages, vehicle breakdowns and passenger impacts, among many others. They are improved for example by giving buses priority through techniques such as technology to optimise traffic signal cycles, infrastructure such as dedicated bus lanes for some or all of the day, bus gates or by operating limited-stop services.

### Public transport crowding

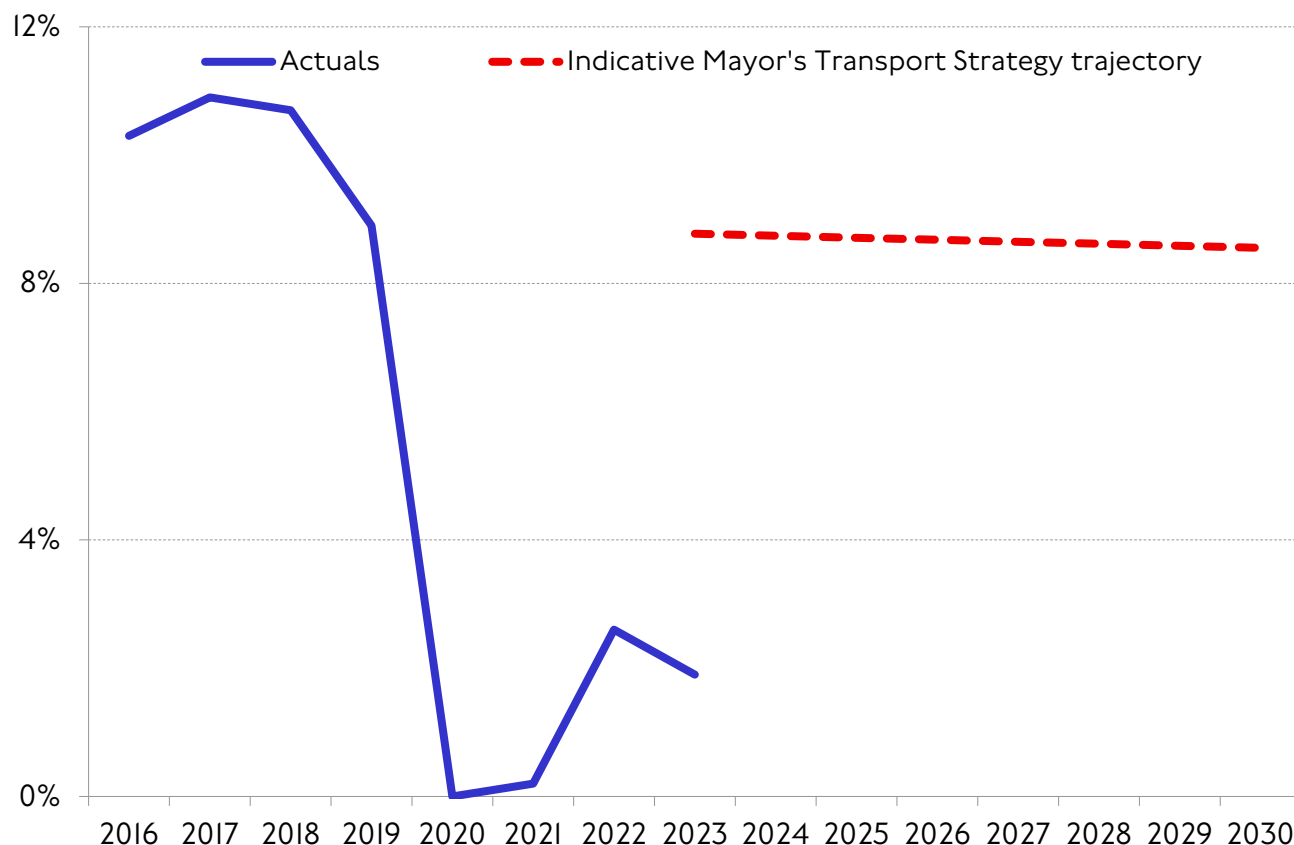
The Mayor's Transport Strategy sets an ambition to reduce the proportion of rail kilometres travelled in crowded conditions by 10-20 per cent compared to a 2016 baseline of 10.3 per cent.

This measure has proven to be highly sensitive to pandemic demand fluctuations (figure 39). In 2020 it effectively fell to zero, but in 2022 it recovered to 2.6 per cent, and in 2023 it fell slightly to 1.9 per cent.

Post-pandemic patterns of customer demand, particularly during the peak period, are driving this reduction in crowding compared to pre-pandemic levels. Furthermore, the

introduction of the Elizabeth line provided additional capacity and is also alleviating crowding on the London Underground network. However, although we remain comfortably ahead of target, without further investment in capacity on our network it is expected that crowding will increase with continuing population growth.

Figure 39 Proportion of passenger kilometres travelled on TfL rail services in standing densities above two people per square metre, 2016-2030.



Source: TfL Public Transport Service Planning.

Note: The method for calculating this metric was updated in 2023 and retrospectively applied to the figures for previous years for consistency. This led to a slight decrease in the proportion of passenger kilometres in crowded conditions compared to previously reported figures. Since the 2041 target is based on the 2016 baseline, this has now been revised downwards to account for the method change.

## Superloop

In summer 2023 TfL launched the [Superloop](#) network of express bus routes connecting outer London town centres and transport hubs, providing substantial reductions in customer journey time and various other enhancements to the customer experience compared to regular TfL buses.

The Superloop network consists of ten express bus routes (of which nine are currently in operation) that connect key outer London town centres and transport hubs, offering improved connections and journey times (figure 40). The current Superloop stretches 179 kilometres (of which 138 kilometres are for the outer London 'loop' only) and connects 23 boroughs, providing interchanges with 310 other TfL bus routes and 23 rail lines across 49 rail stations.

Overall, Superloop has had a net positive impact on bus demand (even accounting for abstraction from parallel routes) and Superloop routes are generally showing better demand outcomes than the rest of the bus network. Furthermore, perception surveys conducted after the new services were introduced showed positive results, with most respondents (between 92 and 99 per cent) recognising the brand, thinking that Superloop services were better than other buses (88 per cent) and saying that they would use the service again (93 per cent), thus indicating that Superloop is a valued new product.

Figure 40 Map of the Superloop network.



Source: TfL Public Transport Service Planning.

A combination of factors such as shorter wait times, new direct connections and quicker on-board journeys has led to substantial reductions in customer journey time since the launch of the Superloop network. For illustration, table 9 shows some examples of these reductions on selected sections of the network.

Table 9 Weekday daytime journey time reductions since the introduction of Superloop services on selected sections of the network.

Route	Section	Journey time reduction
SL1	Walthamstow to Arnos Grove	21-27%
SL2	Walthamstow to Bell Corner and Ilford station	5-19%
SL2	Barking town centre to Gallions Reach	50-57%
SL3	Bexleyheath Library to Bromley, Widmore Road	10-20%
SL5	East Croydon to Bromley South station	25-37%
SL10	Hendon station to Harrow bus station	21-28%

Source: TfL Public Transport Service Planning.



# New homes and jobs

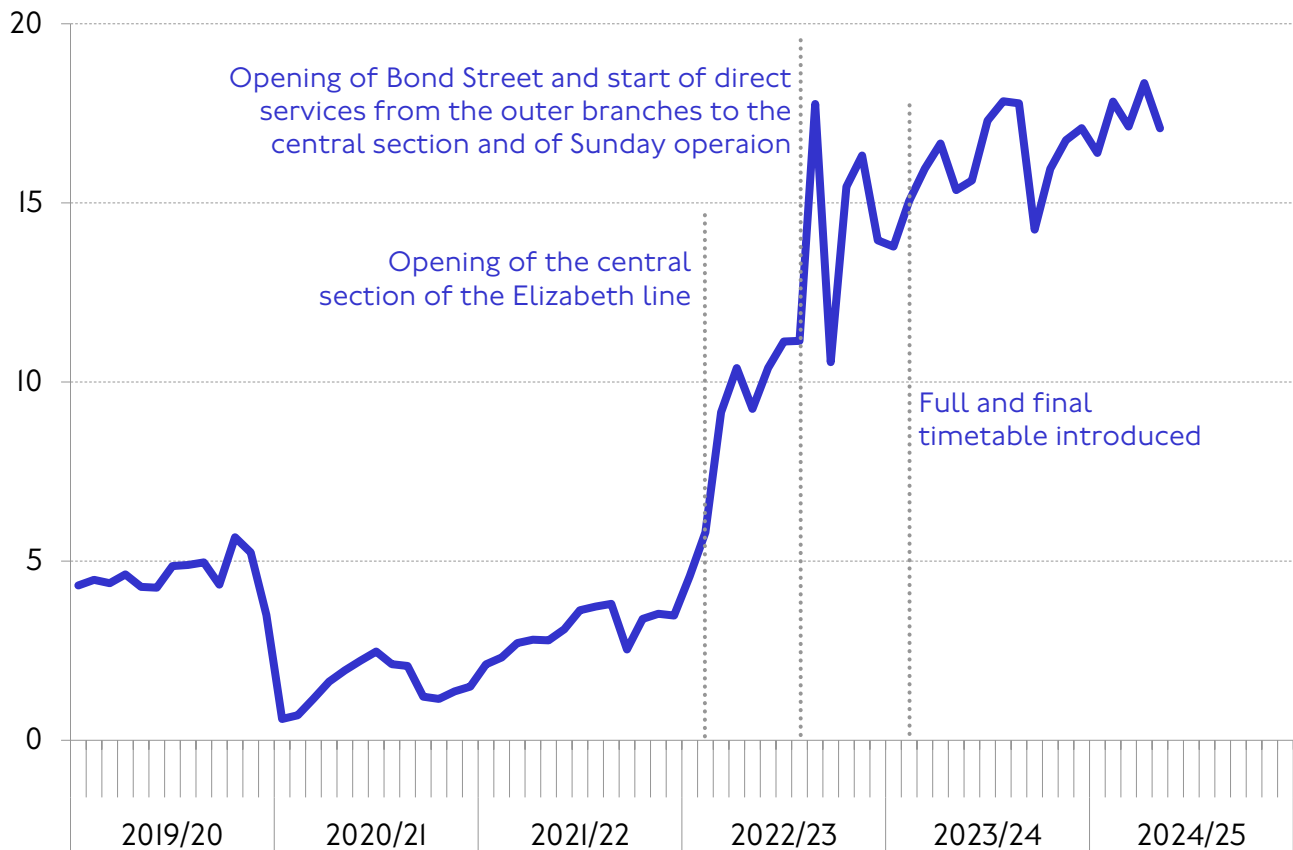
## The Elizabeth line

The Elizabeth line officially opened in May 2022 with the start of services through the central tunnelled section, and the full and final timetable was introduced a year later in 2023, marking the end of the phased opening. However, services on what are now the outer branches of the Elizabeth line had been running under the TfL Rail brand since 2015.

In 2022/23 (slightly less than a full year since the opening), the Elizabeth line saw an estimated 143 million journey stages. This increased by 54 per cent to an estimated 220 million in 2023/24. The Elizabeth line continues to deliver transformative public transport capacity benefits, carrying an average of 660,000 journeys per day as of July 2024.

Figure 4I shows the trend in passenger journeys by financial period since the year before the coronavirus pandemic. Demand has been continuously increasing and often with boosts around the key milestones in the phased opening.

Figure 4I Periodic journeys (in millions) on the Elizabeth line, by financial period, period I 2019/20-period 5 2024/25.



Source: TfL Strategic Analysis, Customer & Strategy, based on TfL service performance data.  
Note: Period 5 2024/25 figures are early estimates and therefore subject to change.

The Elizabeth line has also been instrumental in unlocking development in the areas around its stations. While updated estimates are being prepared, early findings suggest

that, between 2008 and 2021, before the full opening, 54,725 new homes were delivered within one kilometre of Elizabeth line stations.

## Silvertown tunnel

The Silvertown tunnel is expected to open in spring 2025 and will link Silvertown to the Greenwich Peninsula in east London (figure 42).

Figure 42 Map of the Silvertown tunnel.



Source: Transport for London.

This new 1.4-kilometre road tunnel with a dedicated bus lane was first proposed in 2012 and plans were approved by the Secretary of State for Transport in 2018. The new tunnel capacity is expected to help make the road network more reliable, cut congestion, make journeys faster for drivers and improve overall air quality around the Blackwall Tunnel. It also enables a significant improvement in the public transport offer in this part of the capital, with an increase in bus services from four buses an hour to 21 buses per hour. The scheme also includes improvements for walking and cycling around the tunnel entrances as part of major regeneration on both sides of the river. Further details of the expected benefits and impacts of the new tunnel can be found on the [Silvertown tunnel](#) page on TfL's website.

The impacts of the tunnel on road traffic, air quality and wider social and economic conditions will be of significant interest and TfL has put in place a comprehensive programme of monitoring to measure and assess these impacts. This work responds directly to the monitoring requirements set out in the Development Consent Order for the scheme but is also intended, over time, to provide a rounded evaluation of the impacts of the tunnel.

As part of this work, pre-opening baseline conditions have been measured in the area around the new tunnel expected to see material impacts. This measurement commenced 2-3 years before the expected opening date and will extend for at least three years following the opening of the tunnel. A baseline monitoring report will be published by TfL as part of the Travel in London reports series. This will contain a summary of trends in the variables of primary interest up to (broadly) late 2024 and will provide the baseline against which to assess change, along with other data relating to trends (for example, in road traffic) more widely across London. Comprehensive supporting data will also be available to stakeholders.

Once the tunnel is open and data relating to post-opening impacts begins to accumulate, TfL will publish a series of updates. These will be consolidated into annual Silvertown tunnel impacts monitoring reports produced as part of the Travel in London series.

## London Overground extension to Barking Riverside

In summer 2022 a new station (Barking Riverside) was opened on the extended London Overground line from Gospel Oak to give service to the district centre at the heart of the Barking Riverside development.

This is a further example of the potential of new transport infrastructure to unlock new homes and jobs, with the masterplan for the site including 10,800 new homes, half of which would be affordable. As of autumn 2024, 2,891 of these homes had been completed, with 607 under construction or due to start shortly, and 3,504 with full planning permission.

Building on the early growth in the Barking Riverside development, the developer (Barking Riverside Limited) has begun planning discussions with the intention to increase the number of homes in the masterplan to up to 20,000. Discussions are taking place between TfL, the London Borough of Barking and Dagenham and the developer to understand the transport impacts of the revised masterplan through the usual Transport Assessment process. As a positive endorsement of the Barking Riverside rail extension, the additional homes would come forward with much lower car parking with the aim of maximising sustainable travel to and from the area.

## Opportunity Areas

[Opportunity Areas](#) are designated through the London Plan as areas with particular development potential. They have an important role in delivering the 66,000 extra homes per year that London needs. TfL's monitoring work in Opportunity Areas is based around the Mayor's Transport Strategy principles of Good Growth, focusing on housing delivery, access to public transport and travel by active, efficient and sustainable modes.

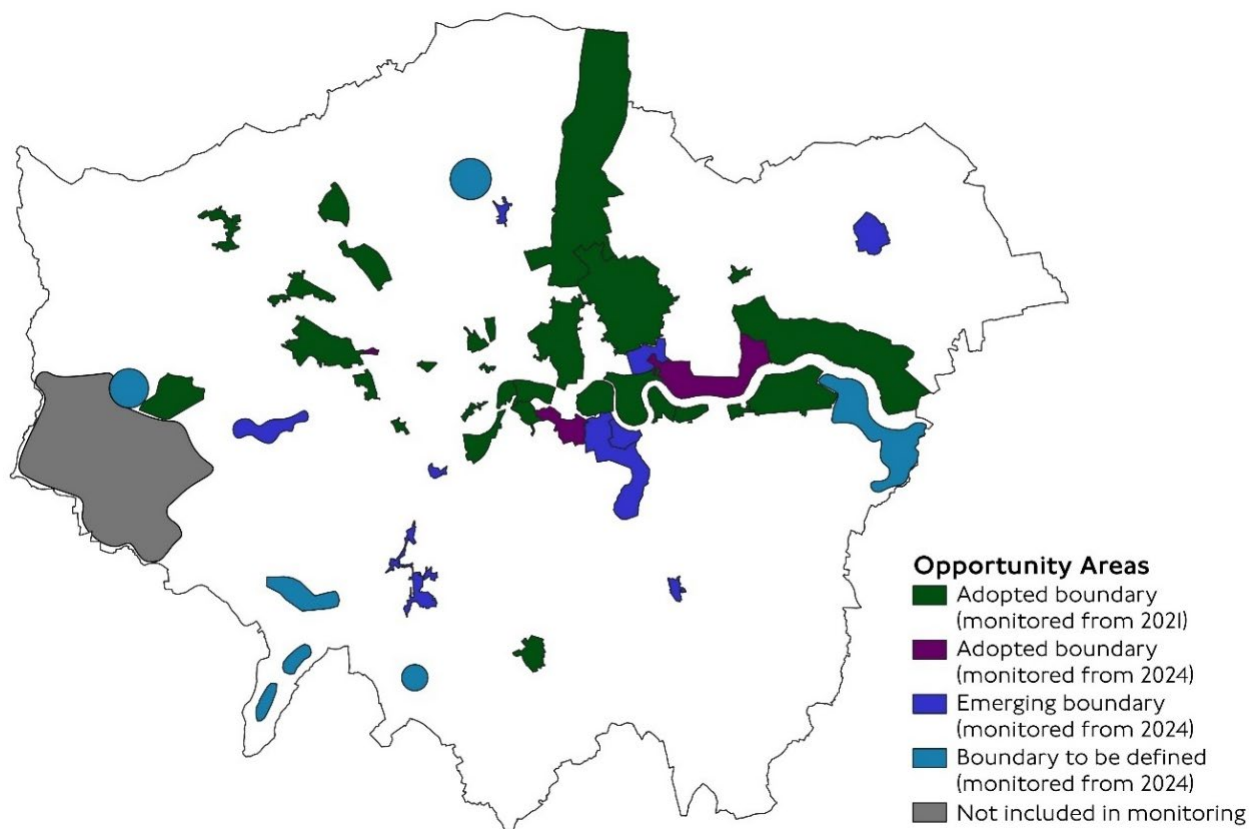
### Public transport access level (PTAL) in Opportunity Areas

The Mayor's ambition is to increase the number of Londoners living in areas that are well connected by public transport, as measured by the public transport access level (PTAL). To monitor this, we have developed a measure of the proportion of Londoners living in areas with 'high' PTAL (four or higher) both in London and in Opportunity Areas.

This measure was first reported in [Travel in London report 14](#), with only Opportunity Areas with ‘adopted’ boundaries in 2021 monitored, as these boundaries were defined and would remain consistent in future years. However, it is also important to monitor Opportunity Areas with an ‘emerging’ boundary or those with a ‘boundary to be defined’, while also noting that to ensure consistent monitoring across the years boundaries need to be fixed at some point in time. Therefore, for this year’s monitoring, data is shown for the 28 Opportunity Areas previously monitored until 2023, including updated data for 2024, as well as an additional data point in 2024 for when Opportunity Areas classified as ‘emerging’ and ‘boundaries to be defined’ are included, as well as those with ‘adopted’ boundaries since 2021.

The boundaries used are fixed as of April 2024 to ensure consistency for monitoring purposes. The live status of Opportunity Areas and boundaries is available on this [Opportunity Areas map](#). Note the Heathrow Opportunity Area has been excluded for monitoring purposes due to the large geographic area and the small capacity identified for new homes and jobs relative to the existing population, which would otherwise lead to distortions in the metric (figure 43).

Figure 43 Opportunity Area boundaries monitored from 2021 and additional boundaries included in the monitoring from 2024, April 2024.

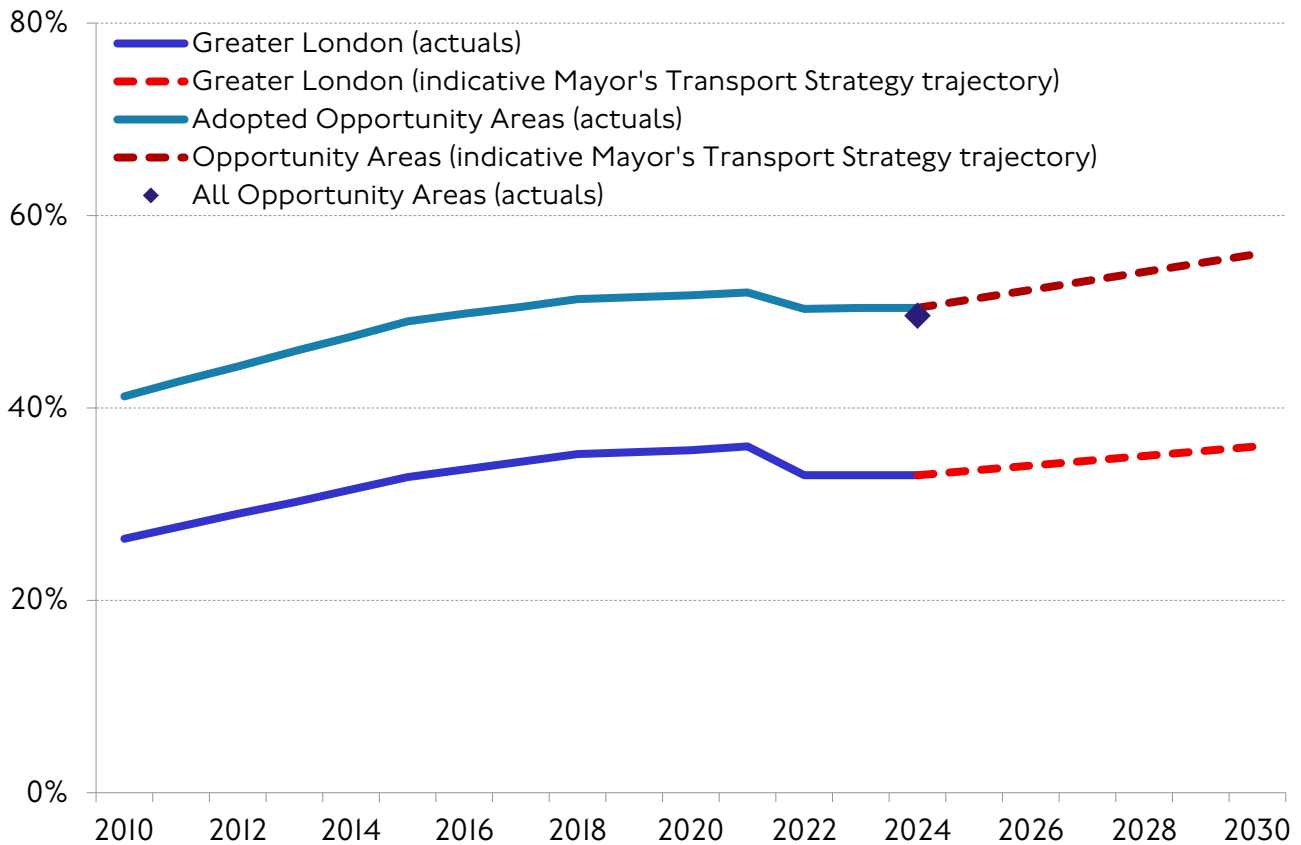


Source: Greater London Authority.

Figure 44 shows that, before 2022, the proportion of London residents and residents of (adopted) Opportunity Areas living in high PTAL areas had been steadily increasing due to improvements to the public transport network as well as to the delivery of homes in well-connected locations. However, in 2022 the proportion of Londoners living in areas with a high PTAL decreased, mainly due to timetable changes on the National Rail network and, to a lesser degree, on the bus network. This continued into 2023 and 2024, resulting in a similar proportion of Londoners living in high PTAL areas as in 2022.

In 2024, 50.4 per cent of Londoners living in adopted Opportunity Areas (monitored since 2021), lived in high PTAL areas. The proportion for the new metric which includes all Opportunity Areas was 49.6 per cent. This compares to a Greater London total of 33 per cent.

Figure 44 Proportion of the population living in areas of high (4-6) public transport access level (PTAL), London's Opportunity Areas versus Greater London, 2010-2030.



Source: TfL Strategic Analysis, Customer & Strategy.

Note: 2024 figures are provisional and may be revised once finalised 2024 PTAL data is available.

### Mode shares in Opportunity Areas

Figure 45 shows the active, efficient and sustainable mode share of London resident trips with an origin or destination in an adopted Opportunity Area. The Opportunity Areas monitored as part of this metric are the 28 locations with adopted boundaries as of 2021, when this metric was defined.

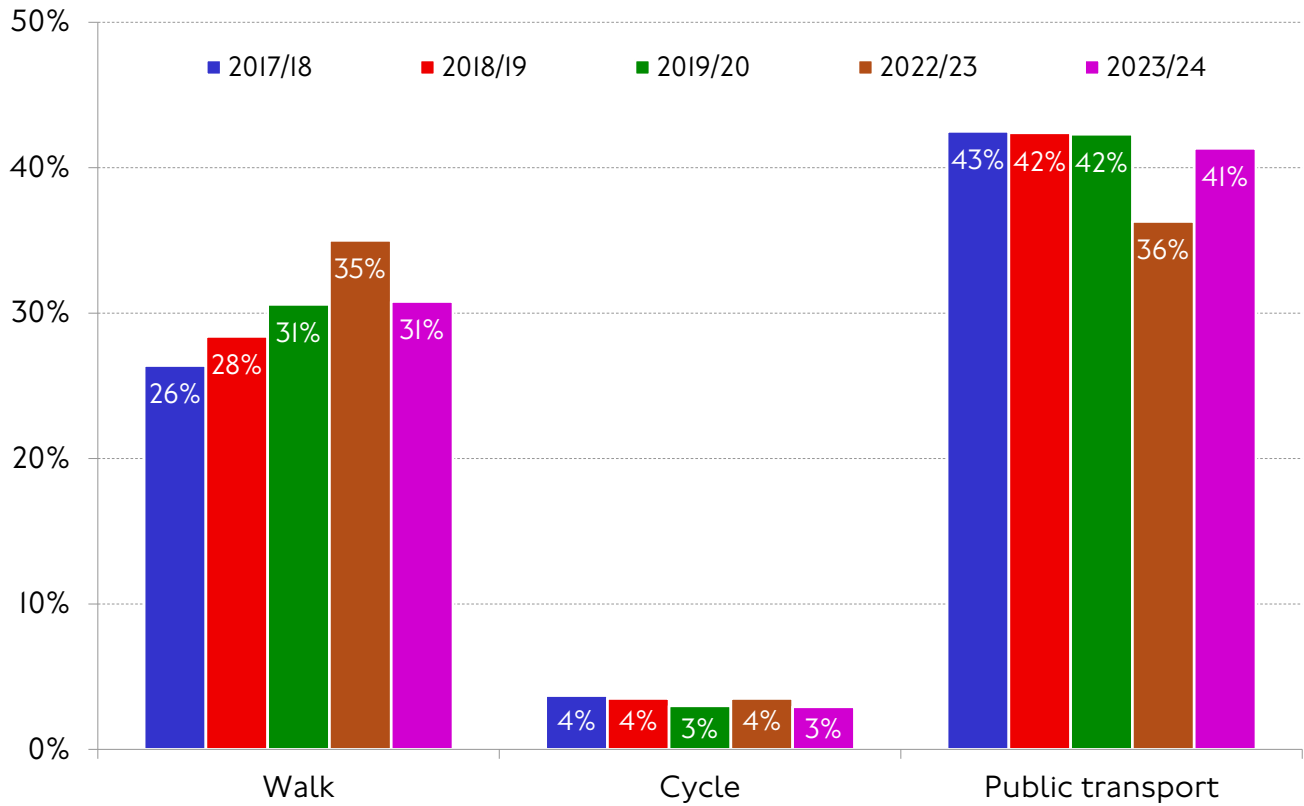
Before the pandemic there was a steady increase in the walk mode share in Opportunity Areas. By 2022/23 there was a noticeable step change compared to 2019/20, increasing by four percentage points to 35 per cent in 2022/23, although this decreased in 2023/24 with walk mode share returning to 31 per cent.

Cycle mode share in Opportunity Areas fell slightly in 2023/24 compared to 2022/23, to 2.9 per cent of trips.

Public transport mode share increased by five percentage points in 2023/24, to 41 per cent, although this remains slightly lower compared to 2019/20.

Overall, the active, efficient and sustainable mode share in 2023/24 was 75 per cent, the same as in 2022/23, but higher than the London resident trip mode share of 67 per cent.

Figure 45 Walking, cycling and public transport mode share in London's Opportunity Areas, LTDS, 2017/18-2023/24.



Source: TfL Strategic Analysis, Customer & Strategy.

### Housing delivery in Opportunity Areas

A total of 81,008 homes were delivered in adopted Opportunity Areas over the period from April 2019 to March 2024, of which 25 per cent were affordable homes. The delivery of homes over this period was in line with the rate required to deliver the London Plan indicative housing capacity in adopted Opportunity Areas by 2041.

The Opportunity Areas with the highest number of homes delivered over this period were Isle of Dogs (8,066), Olympic Legacy (7,683), and Lee Valley (7,163). The highest number of affordable homes were delivered in Royal Docks and Beckton Riverside (2,219), accounting for 36 per cent of all homes delivered in the Opportunity Area. Overall, 25 per cent of the homes delivered in Opportunity Areas between April 2019 and March 2024 were affordable, totalling 19,988 homes.

### Places for London

Places for London is TfL's property company and aims to meet the growing needs of the Capital by delivering new homes and providing new offices on our land. With over 5,500 acres of land across the Capital, TfL is one of London's largest landowners, providing workspaces for 1,500 customers, of which 90 per cent are small businesses. Places for London is wholly TfL-owned and has a programme to start 20,000 homes by

2031, targeting half of these homes to be affordable to help transform London in line with the Mayor's Transport Strategy.

All operating profits made from recurring revenues will continue to be returned to TfL as a dividend, creating a growing long-term revenue stream that can be reinvested into the transport network. More information can be found on the [Places for London](#) website.

We have now completed 1,324 new homes, 54 per cent of which (710 homes) are affordable, and have a further 3,000 under construction, of which 47 per cent will be affordable. In 2024/25 we expect to submit applications for up to a further 8,600 homes. Planning permissions that were granted last year included:

- 50 homes (36 per cent affordable) at South Kensington station in Kensington and Chelsea
- 351 build-to-rent homes (40 per cent affordable) at Cockfosters in Enfield
- 74 homes (100 per cent affordable) at Snaresbrook station in Redbridge

Our joint venture partnership with Barratt London is making great progress. Last year, 350 homes (including 50 per cent affordable housing) were built at Blackhorse View in Waltham Forest. Throughout the construction we supported around 300 new jobs, including apprenticeship opportunities, and 25 per cent of those employed came from within the local borough. Construction is advancing at our second project with Barratt London at Wembley Park in Brent, delivering 454 homes (40 per cent affordable). Construction is expected to start at Bollo Lane in Ealing in 2024, which will provide up to 900 highly sustainable homes (50 per cent affordable) and new pedestrian and cycle links. Working alongside Barratt London, we could deliver an additional 2,300 homes over the next 10 years.

Last year we also announced a strategic partnership with Network Rail that aims to accelerate the delivery of regeneration and development activity across London, particularly where there are TfL or other public sector landowners adjacent. It combines our expertise, experience and knowledge, enabling us to unlock the potential of sites near railways and develop thousands of new homes on Network Rail sites.

## Other reports in the Travel in London 2024 series

Further reports in the Travel in London series will be published on the [Travel in London reports](#) page according to the indicative schedule below:

<b>Report title</b>	<b>Expected publication</b>
Update report: Consolidated estimates of total travel and mode shares	December 2024
Update report: The travel behaviour of London residents based on the London Travel Demand Survey	December 2024
Update report: Active travel trends	December 2024
Update report: Trends in public transport demand and operational performance	December 2024
Focus report: Motorcycle travel trends	December 2024
Focus report: Car ownership trends	December 2024
Focus report: Travel to the Isle of Dogs and Canary Wharf	Early 2025
Update report: Road traffic trends	Early 2025



## About Transport for London (TfL)

Part of the Greater London Authority family led by Mayor of London Sadiq Khan, we are the integrated transport authority responsible for delivering the Mayor's aims for transport. We have a key role in shaping what life is like in London, helping to realise the Mayor's vision for a 'City for All Londoners' and helping to create a safer, fairer, greener, healthier and more prosperous city. The Mayor's Transport Strategy sets a target for 80 per cent of all journeys to be made by walking, cycling or using public transport by 2041. To make this a reality, we prioritise sustainability, health and the quality of people's experience in everything we do.

We run most of London's public transport services, including the London Underground, London Buses, the DLR, London Overground, Elizabeth line, London Trams, London River Services, London Dial-a-Ride, Victoria Coach Station, Santander Cycles and the London Cable Car. The experience, reliability and accessibility of these services is fundamental to Londoners' quality of life.

We manage the city's red route strategic roads and, through collaboration with the London boroughs, we are helping to shape the character of all London's streets. These are the places where Londoners travel, work, shop and socialise. Making them places for people to walk, cycle and spend time will reduce car dependency, improve air quality, revitalise town centres, boost businesses and connect communities. As part of this, our expanded Ultra Low Emission Zone and fleets of increasingly environmentally friendly and zero-emission buses are helping to tackle London's toxic air.

We have constructed many of London's most significant infrastructure projects in recent years, using transport to unlock much needed economic growth. This includes major projects like the extension of the Northern line to Battersea Power Station and Nine Elms in south London, as well as our work at Barking Riverside and the Bank station upgrade.

Working with Government, we opened the Elizabeth line in time for Queen Elizabeth II's Jubilee. This transformational new railway adds 10 per cent to central London's rail capacity and supports the delivery of high-density, mixed-use developments, which are planned around active and sustainable travel to ensure London's growth is good growth. We also use our own land to provide thousands of new affordable homes and our own supply chain creates tens of thousands of jobs and apprenticeships across the country.

We are committed to being an employer that is fully representative of the community we serve, where everyone can realise their potential. Our aim is to be a fully inclusive employer, valuing and celebrating the diversity of our workforce to improve services for all Londoners.

We are constantly working to improve the city for everyone. This means using intel, data and technology to make services intuitive and easy to use and doing all we can to make streets and transport services accessible to all. We reinvest every penny of our income to continually improve transport networks for the people who use them every day. None of this would be possible without the support of boroughs, communities and other partners who we work with to improve our services. By working together, we can create a better city as London's recovery from the pandemic continues.

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**Board**



**Date:** 4 December 2024

**Item:** Report of the Meeting of the Finance Committee held on 19 November 2024

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**This paper will be considered in public**

## **1 Summary**

- 1.1 This paper provides a summary of the items considered by the Finance Committee at its additional meeting held on 19 November 2024. As the meeting was inquorate, with five Members available to discuss the items and only two present in the room, the decisions were taken by the Chair exercising Chair's Action after the discussion of the items. Given the strategic importance of the contracts, it was considered appropriate to continue to meet to ensure transparency in decision-making.

## **2 Recommendation**

- 2.1 **The Board is asked to note the report.**

## **3 Committee Agenda and Summary**

- 3.1 The papers for the meeting of the Committee held on 19 November 2024 were published on 11 November 2024 and are available on the [TfL website](#) with a link to the video recording of the meeting on [TfL's YouTube channel](#).
- 3.2 The two matters considered by the Committee were:
- (a) Elizabeth Line Concession 2 Procurement; and
  - (b) Power Purchase Agreement Comet: Contract Award.
- 3.3 A summary of the items considered and decisions taken is provided below. The more detailed minutes of the meeting will be published ahead of the meeting of the Committee on 18 December 2024.

## **4 Issues Discussed**

### **Elizabeth Line Concession 2 Procurement**

- 4.1 The Chair, following consultation with the Committee, approved Procurement Authority to enable entry into the new concession agreement for the operation of the Elizabeth line passenger train services and ancillary agreements from May 2025. Following the taking of the decision, GTS Rail Operations Limited, a joint venture between Go Ahead Group, Tokyo Metro and Sumitomo Corporation, was announced as taking over the Elizabeth line

operator contract in May 2025. The contract will cover seven years with an option to extend for up to two additional years.

- 4.2 The new concession agreement would ensure that the Elizabeth line continued to showcase investment in TfL, rail and public transport through optimisation and improvement on current high levels of safety, performance and customer satisfaction, while remaining adaptable to an evolving industry and changing customer needs.
- 4.3 Rail for London had undertaken a detailed procurement process and reviewed the current concession agreement, considering lessons learnt throughout its term, updated strategic priorities and best practice drawn from other similar arrangements across TfL, insight from market engagement and wider industry changes. The new concession agreement would continue to cover all aspects of train and station operations over the Elizabeth line.
- 4.4 Four bids were assessed. The key principle of the evaluation methodology was to ensure that the new concession agreement would be awarded to the most economically advantageous bid, allowing for a balance between technical, commercial and financial factors.

#### **Power Purchase Agreement Comet: Contract Award**

- 4.5 The Chair, following consultation with the Committee, approved Procurement Authority of £225m for electricity purchased under Power Purchase Agreement (PPA) Comet for 15 years and the costs under the associated onsale and sleeving arrangements for the same duration.
- 4.6 TfL's first PPA procurement represented a significant milestone and major step forward in realising the target set in the Mayor's Transport Strategy to run a zero-carbon railway by 2030. TfL was London's largest single consumer of electricity, using around 1.6TWh per annum at a cost of around £350m. This represented around 43 per cent of its operational carbon emissions.
- 4.7 To meet this target, TfL had set out a plan to transition the way it purchased electricity to ensure it was sourced from renewable generation. TfL's Energy Purchasing Strategy was considered by the Committee in July 2024, which outlined the plan to procure up to 70 per cent of TfL's total electricity needs from a generator through renewable energy corporate PPAs. The first step in this initiative was PPA Comet, which involved procuring up to 12.5 per cent of TfL's electricity demand, or up to 200GWh, from a new renewable project. Power delivery from the asset was anticipated to begin in 2028.
- 4.8 PPAs offered the best alignment with TfL's financial needs and delivered a new renewable energy supply facility, an additional renewable greening of the grid network and aligned with the Government's policy to accelerate the decarbonisation of the grid.
- 4.9 Members noted that the pay as produced contract meant TfL would be consuming electricity from the grid that was not 100 per cent green at certain

points in time of low power generation. Members suggested exercising caution in not overclaiming that the renewable energy production was 100 per cent green in light of this.

- 4.10 The procurement was only for up to five to 10 per cent of TfL's consumption, using grid consumed energy for most of its energy needs, which is currently constituted with around 40 per cent from renewable sources. TfL had taken a risk mitigated approach to ensure the renewable energy guarantees of origin from an asset and genuine additionality in connecting a new asset to the grid, without paying a premium. Over the next few years as more renewables came on grid, TfL would look to do more for future corporate PPAs and continued to look closely at greening the remainder of its supplies and the flexible green tariff option as it approached 2030. It was an important first step forward in the right direction into an evolving and maturing market.
- 4.11 Beyond the procurement, consideration would be given to what TfL considered to be renewables as part of its future strategic direction and next steps as it was an evolving situation. The lessons learnt during the PPA Comet procurement process would be shared with the Committee.

**List of appendices to this report:**

None

**List of Background Papers:**

Papers submitted to the meeting of the Finance Committee held on 19 November 2024

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**Board**



**Date:** 4 December 2024

**Item:** Report of the Meeting of the People and Remuneration Committee held on 20 November 2024

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**This paper will be considered in public**

## **1 Summary**

- 1.1 This paper provides a summary of the items considered by the People and Remuneration Committee at its meeting on 20 November 2024.

## **2 Recommendation**

- 2.1 **The Board is asked to note the report.**

## **3 Committee Agenda and Summary**

- 3.1 The papers for the meeting of the Committee held on 20 November 2024 were published on 12 November 2024 and are available on the [TfL website](#) with a link to the video recordings of the meeting on [TfL's YouTube channel](#).

- 3.2 The main matters considered by the Committee were:

- (a) Matters Arising, Actions List and Use of Delegated Authority;
- (b) TfL Change Landscape;
- (c) Action on Inclusion – 12 Months On;
- (d) Approach to Reward;
- (e) TfL Savings for Retirement Plan;
- (f) £100,000 or more Process and Pay Outcomes of £100,000 or more Approvals;
- (g) Our Colleague Quarterly Report;
- (h) Risk and Assurance Report Quarter 2 2024/25; and
- (i) Director Salary Reviews 2024.

- 3.3 A summary of the items considered and decisions taken is provided below. The more detailed minutes of the meeting will be published ahead of the meeting of the Committee on 24 February 2025.

## **4 Issues Discussed**

### **Matters Arising, Actions List and Use of Delegated Authority**

- 4.1 The Committee noted details of the exercise of Chair's Action by the former Remuneration Committee, and by this Committee, in relation to the approval of salaries of £100,000 or more and one approval of an exit payment. A paper elsewhere on the agenda provided information on the £100,000 or more process and the outcome from previous Remuneration Committee approvals.

### **TfL Change Landscape**

- 4.2 The Committee received an update on the different change activity taking place across TfL.
- 4.3 The 'Our TfL' Programme (OTP) initiated in June 2022 had set the foundations for TfL to meet the challenges of today and face those of the future. OTP had helped to embed the value chain which, along with the revised Chief Officer structure, enabled TfL to take a more holistic approach to change and work collaboratively across the organisation to deliver its Vision of being a strong, green heartbeat for London. OTP had served its primary purpose over the expected two-year timeframe. As TfL's future pipeline continued to develop and mature, the OTP was being wound down as a programme.
- 4.4 The Committee discussed the Operational Change programme, a suite of projects to deliver TfL's strategic objectives and improve cost efficiency in the Operational part of the organisation. It also discussed the Enterprise Resource Planning programme, a suite of systems and associated processes used to run an organisation. These covered Finance, HR, Procurement and, for TfL, deployment of its Operational employees. Members noted the good progress that was being made and the challenges ahead.

### **Action on Inclusion – 12 Months On**

- 4.5 The Committee discussed the update on the delivery of the Action on Inclusion Strategy, from its launch at the end of June 2023. The aim of the strategy was to create an inclusive workplace where everyone could belong, supporting the delivery of the 'creating an inclusive culture' pillar of the Colleague Strategy.
- 4.6 Members noted the update on progress to-date, future commitments, and the next steps. The approach to monitoring the actions was noted and future updates would include input from the Chief Operating Officer and the Chief Capital Officer to highlight progress within their directorates.
- 4.7 The Committee welcomed the holistic and coherent approach taken in the strategy and the action already taken. It noted the work on training and culture change, particularly on improving the experience of disabled colleagues, which staff surveys showed were the least engaged. The launch of TfL's Strategic Workforce Plan would be compatible with the Action on Inclusion work.



## **Approach to Reward**

- 4.8 The Committee noted the importance of ensuring that TfL provided a fair and attractive employee offer as an integral part of its Colleague Strategy, balancing fairness and affordability with meeting the competitive challenge of attracting and retaining talent. In response to that challenge, TfL was reviewing its approach to pay management.
- 4.9 The Committee noted the current progress on pay talks and work on pay structures, frameworks, processes, and mechanisms used to set, manage and progress pay. It also noted the development of the Job Families concept and its benefits for attracting and retaining staff. They were being discussed with staff and trade unions ahead of a consultation, with the aim of implementing the concept for non-operational roles in 2025.

## **TfL Savings for Retirement Plan**

- 4.10 The Committee noted the new 'Supplementary Section' of the TfL Savings for Retirement Plan (SfR Plan). This had been set up by the TfL Pension team and trustees of the SfR Plan at the request of TfL. The change was intended to help retain colleagues and was cost neutral to TfL. It would impact a small number of colleagues, particularly those with long service, though the number was expected to increase over time.

## **£100,000 or more Process and Pay Outcomes of £100,000 or more Approvals**

- 4.11 The Committee approved the remuneration for appointments with a full-time equivalent salary of £100,000 or more per annum. The Committee noted changes to the process and the regular update that provided a comparison of salaries approved by the Committee with that on actual appointment.
- 4.12 Members discussed the rationale for the process and the robust internal governance applied before proposals were submitted to the Committee. The Chair and Chief People Officer would discuss the criteria for what was submitted to the Committee and the reporting mechanisms to ensure Board oversight, ahead of a further discussion at the next meeting.

## **Our Colleague Quarterly Report**

- 4.13 The Committee noted the update on key activities across the Chief People Office area for the period September to November 2024, demonstrating progress against the Colleague Strategy.
- 4.14 Highlights from the report included: the work to improve the workplace adjustments process; the preparation for the annual colleague survey (to be launched in January 2025); and the development of the Strategic Workforce Plan. TfL had welcomed 271 new graduates (88), apprentices (163) and interns (21) in September 2024 across 65 different development programmes. The cohort was the most representative TfL had attracted and TfL was recognised by The Times as a top graduate employer.

## **Risk and Assurance Report Quarter 2 2024/25**

- 4.15 The Committee noted an overview of the status of and changes to Enterprise Risk 02 (ER02) – ‘Attraction, retention, wellbeing and health of our employees’. The report summarised the findings from the assurance activity undertaken by teams within TfL’s Risk and Assurance Directorate associated with this risk. The paper covered the work during Quarter 2 of 2024/25 (23 June to 14 September 2024).
- 4.16 ER02 had moved from requires improvement to adequately controlled. Members discussed the governance and processes in place to investigate allegations of staff-related fraud.

## **Director Salary Reviews 2024**

- 4.17 The terms of reference of the Committee required it to review from time to time the remuneration of the Commissioner, Chief Officers and Directors reporting to the Commissioner. The Committee approved the Commissioner’s recommended adjustments to base pay for a Director role.

### **List of appendices to this report:**

None

### **List of Background Papers:**

Papers submitted to the meeting of the People and Remuneration Committee held on 20 November 2024

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**Board**



**Date:** 4 December 2024

**Item:** Report of the Meeting of the Audit and Assurance Committee to be held on 27 November 2024

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**This paper will be considered in public**

## **1 Summary**

1.1 This paper provides a summary of the items to be considered by the Audit and Assurance Committee at its meeting on 27 November 2024 (after the papers for this meeting of the Board have been published).

## **2 Recommendation**

2.1 **The Board is asked to note the report.**

## **3 Committee Agenda and Summary**

3.1 The papers for the meeting of the Committee to be held on 27 November 2024 were published on 19 November 2024 and are available on the [TfL website](#) with a link to the video recordings of the meeting on [TfL's YouTube channel](#).

3.2 The main matters to be considered by the Committee are:

- (a) Draft Auditor's Annual Report - Year Ended 31 March 2024;
- (b) Audit Results Report - Year Ended 31 March 2024;
- (c) EY Independence Letter - Non-Audit Services for the Period 1 April to 31 October 2024;
- (d) External Audit Plan TfL, TTL and Subsidiaries – Year Ending 31 March 2025;
- (e) Risk and Assurance Quarter 2 Report 2024/25;
- (f) Independent Investment Programme Advisory Group (IIPAG) Quarterly Report;
- (g) Places for London Assurance Update;
- (h) Finalisation of TfL's Annual Report and Statement of Accounts for Year Ending 31 March 2024;
- (i) Legal Compliance Report (1 April 2024 – 30 September 2024);
- (j) Annual Tax Compliance Update;
- (k) Financial Control Environment Trend Indicators; and

(l) Register of Gifts and Hospitality for Members and Senior Staff.

- 3.3 A summary of the items to be considered and decisions to be taken is provided below. The more detailed minutes of the meeting will be published ahead of the meeting of the Committee on 10 March 2025.

## **4 Issues to be Discussed**

### **Draft Auditors' Annual Report - Year Ended 31 March 2024**

- 4.1 The Committee is asked to note the draft Annual Audit Report prepared by Ernst & Young LLP (EY), which summarises its conclusions on the Annual Statement of Accounts and value for money arrangements for the year ended 31 March 2024. A final version will be presented to the Committee after the audit is concluded.
- 4.2 The final audit fees for 2023/24 remain outstanding and EY has identified a number of fee variations and overruns. These are currently under discussion with management.

### **Audit Results Report – Year Ended 31 March 2024**

- 4.3 The Committee is asked to note EY's report, which informs the Committee of the status of the overall conclusion of the audit and summarises the findings of EY's work for the year ended 31 March 2024. Audit work is largely complete, but several close out procedures remain outstanding before the audit opinion can be issued.

### **EY Independence Letter - Non-Audit Services for the Period 1 April to 31 October 2024**

- 4.4 The Committee is asked to note the paper and agree with EY's conclusion that the provision of the future services referred to in their appended letter to the paper would not create a threat to EY's independence as auditor of TfL.
- 4.5 The letter informs the Committee on any independence matters including existing non-audit services performed and the fees charged by EY for the period ending 31 October 2024.

### **External Audit Plan TfL, TTL and Subsidiaries – Year Ending 31 March 2025**

- 4.6 The Committee is asked to note the report on EY's plan for the audit of the financial statements of TfL, Transport Trading Limited and its subsidiaries for the year ending 31 March 2025.
- 4.7 The proposed timetable for the 2024/25 financial year has been extended to September 2025 to reflect the increased complexity of the TfL audit in recent years. The public inspection period will commence in June 2025.

### **Risk and Assurance Quarter 2 Report 2024/25**

- 4.8 The Committee is asked to note the quarterly update on work completed by the Risk and Assurance Directorate during Quarter 2 of 2024/25 (23 June to 14 September 2024) and other information about the Directorate's activities.

### **Independent Investment Programme Advisory Group Quarterly Report**

- 4.9 The Committee is asked to note IIPAG's Quarterly Report for November 2024 and the management response.
- 4.10 From the assurance reviews undertaken during Quarter 2 2024/25, IIPAG made 18 recommendations, one of which was a critical issue. All of the recommendations have been agreed with the respective project teams. The three overdue recommendations at the end of Quarter 2 are not critical.

### **Places for London Assurance Update**

- 4.11 The Committee is asked to note the update on progress with assurance activity across Places for London during Quarter 2 2024/25.
- 4.12 There were 14 Project Assurance and IIPAG recommendations open at the end of Quarter 2. There were no overdue recommendations nor any overdue audit actions.
- 4.13 Work will commence to develop Places for London's Risk Appetite and Tolerance approach, in line with TfL's.

### **Finalisation of TfL's Annual Report and Statement of Accounts for Year Ending 31 March 2024**

- 4.14 The Board considered the draft Statement of Accounts at the meeting on 24 July 2024 and approval authority was delegated to the Committee.
- 4.15 The Committee is asked to approve the 2023/24 Statement of Accounts and note that the statutory Chief Finance Officer has authority to make any adjustments arising from the work prior to EY signing their opinion or from any comments made by the Board of any Subsidiary company. The Chair of the Committee will sign and date the Statement of Accounts in due course.

### **Legal Compliance Report (1 April 2024 – 30 September 2024)**

- 4.16 The Committee is asked to note the legal and compliance information provided by each TfL Directorate for the Legal Compliance Report for the period 1 April to 30 September 2024, as well as updates on ongoing matters carried over from the previous reports where applicable.
- 4.17 There are no material breaches of law which would affect TfL's continued operations and reported matters continue to be broadly in line with previous reports.

## **Annual Tax Compliance Update**

- 4.18 The Committee is asked to note the key policies and documents that form TfL's Tax Governance Framework and the steps being taken to ensure TfL is compliant with all relevant tax legislation, as well as an update on any key tax matters considered during the year.

## **Financial Control Environment Trend Indicators**

- 4.19 The Committee is asked to note the Quarter 2 2024/25 Financial Control Indicators, which inform the Committee as to the control environment across TfL's Finance, Business Services and Procurement and Commercial teams.

## **Register of Gifts and Hospitality for Members and Senior Staff**

- 4.20 The Committee is asked to note details of the gifts and hospitality declared by Board Members and senior staff from 1 August and 31 October 2024.
- 4.21 There were no declarations made by Members during the three-month period. A total of 144 declarations of offers have been made by senior staff during the period, 67 of which were declined and 77 accepted.
- 4.22 The number of offers received during the period was higher than in the same period in 2023 but reflects figures prior to the coronavirus pandemic.

## **List of appendices to this report:**

None

## **List of Background Papers:**

Papers submitted to the meeting of the Audit and Assurance Committee on 27 November 2024

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**Board**



**Date:** 4 December 2024

**Item:** Report of the Meeting of the Customer, Sustainability and Operations Panel to be held on 28 November 2024

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**This paper will be considered in public**

## **1 Summary**

1.1 This paper provides a summary of the items to be considered by the Customer, Sustainability and Operations Panel at its meeting on 28 November 2024 (after the papers for this meeting of the Board have been published).

## **2 Recommendation**

2.1 **The Board is asked to note the report.**

## **3 Panel Agenda and Summary**

3.1 The papers for the meeting of the Panel to be held on 28 November 2024 were published on 20 November 2024 and are available on the [TfL website](#) with a link to the video recording of the meeting on [TfL's YouTube channel](#).

3.2 The main matters to be considered by the Panel are:

- (a) TfL Corporate Environment Plan – Operations;
- (b) Assisted Transport Services Update;
- (c) TfL Action to Identify and Manage Physical Climate Risks;
- (d) Customer, Sustainability and Operations Report – Quarter 2 2024/25; and
- (e) Risk and Assurance Report Quarter 2 2024/25.

3.3 A summary of the items to be considered is provided below. The more detailed minutes of the meeting will be published ahead of the meeting of the Panel on 13 March 2025.

## **4 Issues to be Discussed**

### **TfL Corporate Environment Plan – Operations**

4.1 The Panel is asked to note the update on the implementation of the key themes within the TfL Corporate Environment Plan in Operations relating to

the climate emergency, air quality, sustainable resource, green infrastructure, and best environmental practices.

- 4.2 The paper sets out details of how the key themes are continuing to be embedded by the TfL Operations team. The update also provides a summary of the Operations Green milestones.

#### **Assisted Transport Services Update**

- 4.3 The Panel is asked to note the update on the work carried out to progress the Assisted Transport Services strategy and the updated Roadmap. The paper provides an update on the trends in Dial-a Ride services and Taxicard performance, the use of the new booking and scheduling platform and customer call performance. The next annual customer satisfaction survey is already underway for 2024/25, with results expected in spring 2025.
- 4.4 An update is also provided on the Travel Mentoring Service for individuals with special needs and disabilities, particularly Special Educational Needs schools. Currently, work is being undertaken to refresh and standardise bus days programme to provide a consistent approach to delivering these sessions across London. A working partnership is in place with train operators Govia and South Western Railway to assist customers traveling between interchanges with the TfL network.

#### **TfL Action to Identify and Manage Physical Climate Risks**

- 4.5 The Panel is asked to note the update on TfL's work to understand its physical climate risks ahead of the publication of TfL's fourth submission to the Department for Environment, Food and Rural Affairs under the Adaptation Reporting Power in December 2024.
- 4.6 TfL is working on adapting to climate change, including extreme weather, by reducing the impacts of climate change (for example, by installing flood barriers and Sustainable Drainage Systems).
- 4.7 An update on the implementation of the Adaptation Plan in the two years since its publication in March 2023 will be brought to the meeting of the Panel on 13 March 2025.

#### **Customer, Sustainability and Operations Report – Quarter 2 2024/25**

- 4.8 The Panel is asked to note the update on TfL's customer, sustainability and operations performance for Quarter 2 of 2024/25 (23 June to 14 September 2024).

#### **Risk and Assurance Report Quarter 2 2024/25.**

- 4.9 The Panel is asked to note the report which provides an overview of the status of, and changes to Enterprise Risk 06 - 'Deterioration of Operational Performance'. The paper also summarises the findings from the assurance activity associated with the risk, based on the second line of defence audit



work of the Quality, Safety and Security Assurance team and the third line of defence work by the Internal Audit team during Quarter 2 of 2024/25.

**List of appendices to this report:**

None

**List of Background Papers:**

Papers submitted to the meeting of the Customer, Sustainability and Operations Panel on 28 November 2024

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**Board**



**Date:** 4 December 2024

**Item:** Report of the Meeting of the Safety and Security Panel to be held on 2 December 2024

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**This paper will be considered in public**

## **1 Summary**

1.1 This paper provides a summary of the items to be considered by the Safety and Security Panel at its meeting on 2 December 2024 (after the papers for this meeting of the Board have been published).

## **2 Recommendation**

2.1 **The Board is asked to note the report.**

## **3 Panel Agenda and Summary**

3.1 The papers for the meeting of the Panel to be held on 2 December 2024 were published on 22 November 2024 and are available on the [TfL website](#) with a link to the video recording of the meeting on [TfL's YouTube channel](#).

3.2 The main matters to be considered by the Panel are:

- (a) Safety, Health and Security Report - Quarter 2 2024/25;
- (b) Trends in Safety and Key Improvement Activity;
- (c) Update on the TfL Cyber Security Incident;
- (d) Trends in Security and Key Improvement Activity; and
- (e) Risk and Assurance Report Quarter 2 2024/25.

3.3 A summary of the items to be considered is provided below. The more detailed minutes of the meeting will be published ahead of the meeting of the Panel on 12 February 2025.

## **4 Issues to be Discussed**

### **Safety, Health and Security Report - Quarter 2 2024/25**

4.1 The Panel is asked to note the Safety, Health and Security Report for Quarter 2 of 2024/25 (23 June to 14 September 2024).

## **Trends in Safety and Key Improvement Activity**

- 4.2 The Panel is asked to note an overview of trends in safety performance and key activity to maintain and improve safety outcomes in London. The paper provides a basis for future performance discussions and Members will be invited to comment on additional action that TfL can take to improve safety performance.

## **Update on the TfL Cyber Security Incident**

- 4.3 The Panel is asked to note an update on the cyber security incident that commenced on 31 August 2024. TfL is continuing to recover from this incident and restore all systems in a secure and managed way and there continue to be temporary impacts to some customers.
- 4.4 The paper sets out the background to the incident, the latest position and details of an Independent Review that TfL will be commissioning. The review will consider the circumstances surrounding the cyber incident and the impact, TfL's response and whether further improvements are needed to TfL's cybersecurity strategy taking into consideration existing initiatives that are in progress.

## **Trends in Security and Key Improvement Activity**

- 4.5 The Panel is asked to note an update on TfL's Security Strategy, and highlights of its security improvement programmes: eradicating work-related violence and aggression; protecting TfL from the risk of fare evasion; ending violence against women and girls; and cyber security – details of which are provided in the separate item elsewhere on the agenda.

## **Risk and Assurance Report Quarter 2 2024/25**

- 4.6 The Panel is asked to note the overview of the status of, and changes to, Enterprise Risk 01 – 'Inability to deliver safety objectives and obligations', and Enterprise Risk 04 – 'Significant security incident including cyber security'.
- 4.7 The paper also summarises the findings from the associated assurance activity of these risks based on second line of defence audit work by the Quality, Safety and Security Assurance team and third line of assurance work by the Internal Audit team within TfL's Risk and Assurance Directorate. The paper covers the work during Quarter 2 of 2024/25.

### **List of appendices to this report:**

None

### **List of Background Papers:**

Papers submitted to the meeting of the Safety and Security Panel on 2 December 2024

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