

**Your Silvertown and
Blackwall tunnels.
Your river crossings.
Your say.**



Silvertown and Blackwall tunnels user charge consultation

Consultation Report

December 2024

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Glossary

(i) Glossary of terms:

Abbreviation	Full name	Web link:
CPAP	Charging Policies and Procedure	Link
EqIA	Equalities Impact Assessment	Link
ES	Environmental Statement	Link
DCO	Development Consent Order	Link
MMS	Monitoring and Mitigation Strategy	Link
STIG	Silvertown Tunnel Implementation Group	Link
UCAF	User Charge Assessment Framework	Link
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. <i>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</i>
<p><u>Our response:</u></p> <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 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."</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 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.</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 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.</p>

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 proposals¹ 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 28,000²

¹ 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

Proposed level of user charges: Top five most frequently raised issues
1. Oppose/disagree with the proposed charges/charging generally
<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 Project Objectives (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>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 User Charging Assessment Framework (UCAF) to identify how each scenario would contribute to successfully delivering the POs 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 POs delivering a large reduction in delay and congestion on tunnel approaches, while minimising the impact at nearby crossings. 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

Proposed discounts, exemptions and reimbursements: Top five most frequently raised issues	
1. Suggest discounts should be for all residents local to tunnels/living in the surrounding area	2. Suggest residents local to tunnels/living in the surrounding area should be exempt
<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>	
2. Suggest residents local to tunnels/living in the surrounding area should be exempt	

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 through 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 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 platform². 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

² 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	
Total		6,641,545

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

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
Total	5,361	100

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
Total	3,972	100

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
Total	5,361	100

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

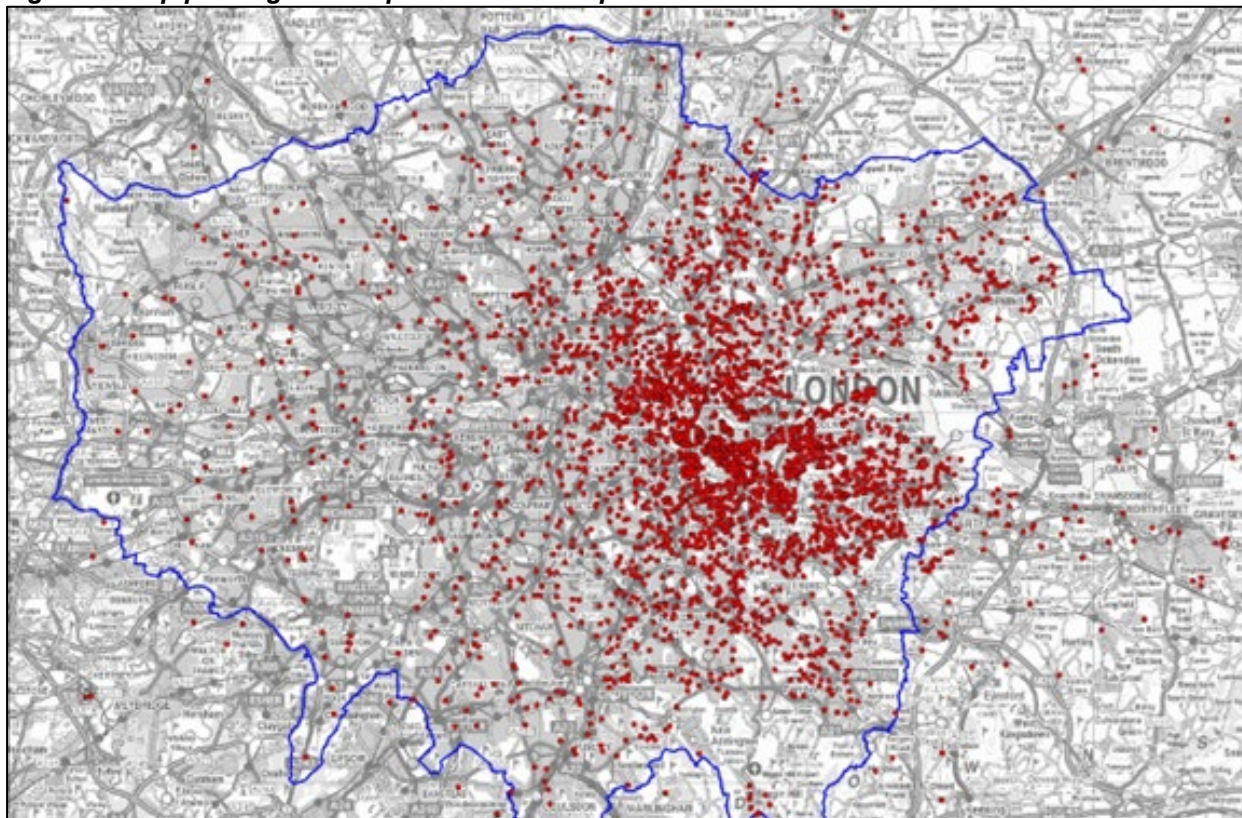
Hammersmith & Fulham	14	< 1
Haringey	28	1
Harrow	14	< 1
Havering	123	3
Hillingdon	12	< 1
Hounslow	11	< 1
Islington	44	1
Kensington & Chelsea	5	< 1
Kingston Upon Thames	12	< 1
Lambeth	42	1
Lewisham	275	7
Merton	23	< 1
Newham	328	8
Redbridge	146	4
Richmond Upon Thames	8	< 1
Southwark	114	3
Sutton	17	< 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.

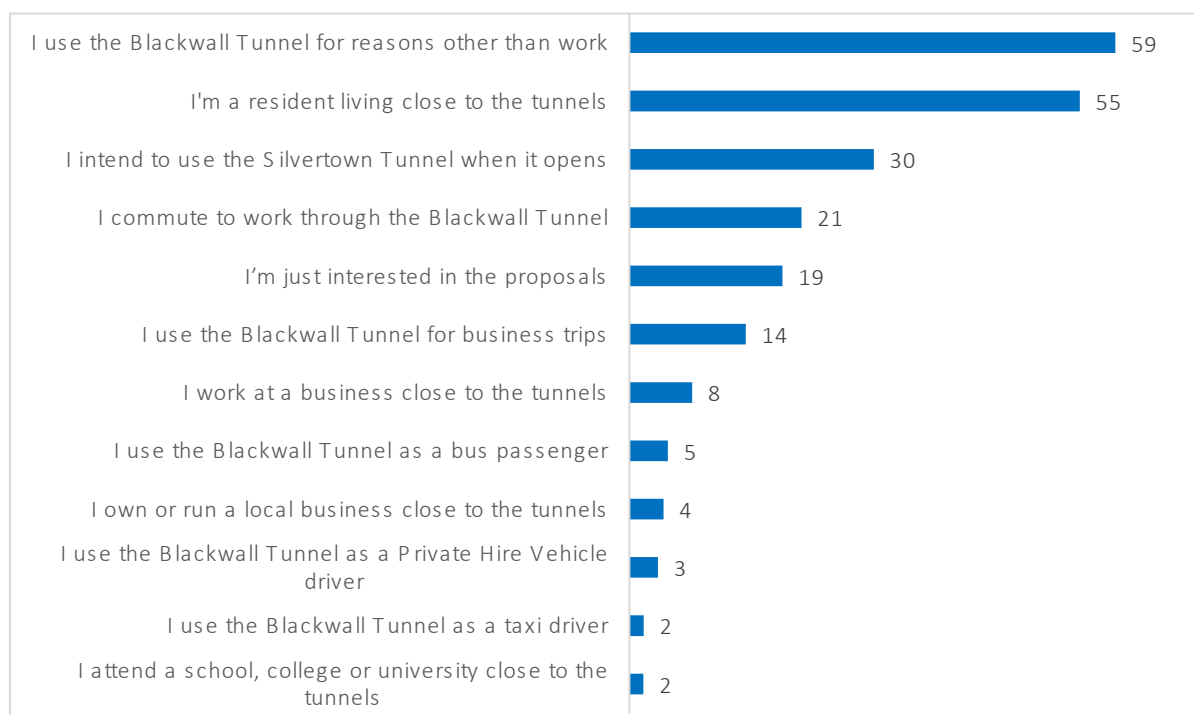
Figure 1: Map plotting out the postcodes of responders to the consultation



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
Tunnel user charge levels	
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
Impacts	
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
Discounts and exemptions	
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
About the consultation	
More information needed on proposals/proposals are not clear (general comment)	3
Suggest further consultation/engagement needed	1
Other comments	
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

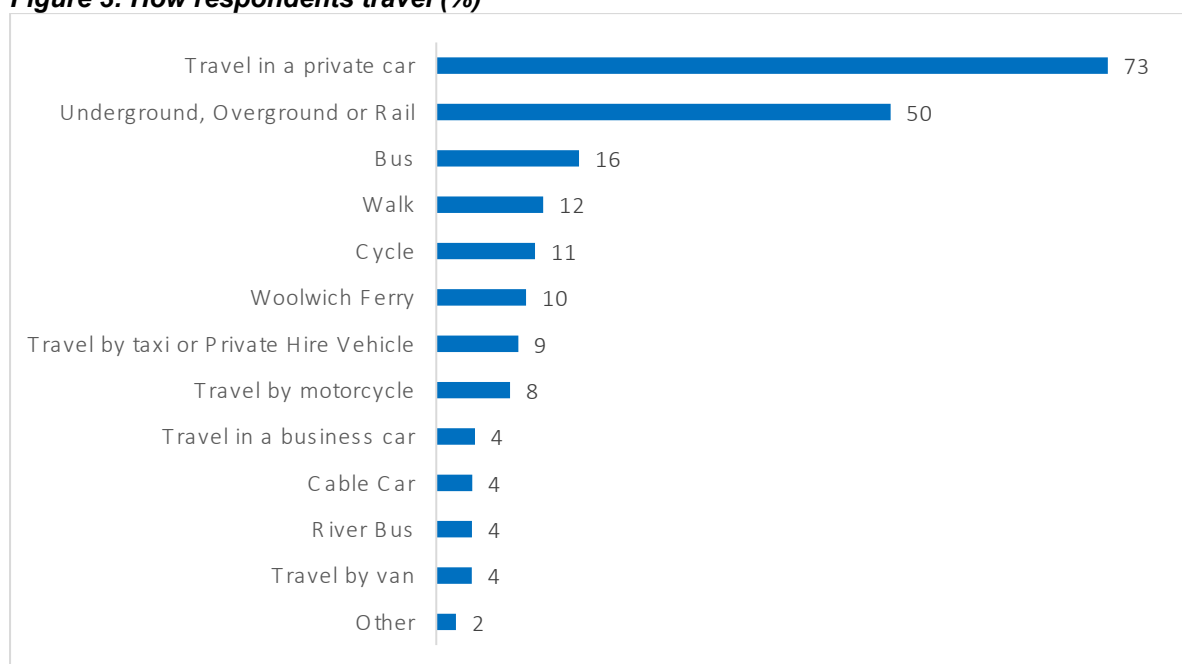
4,090 people responded to this question.

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)

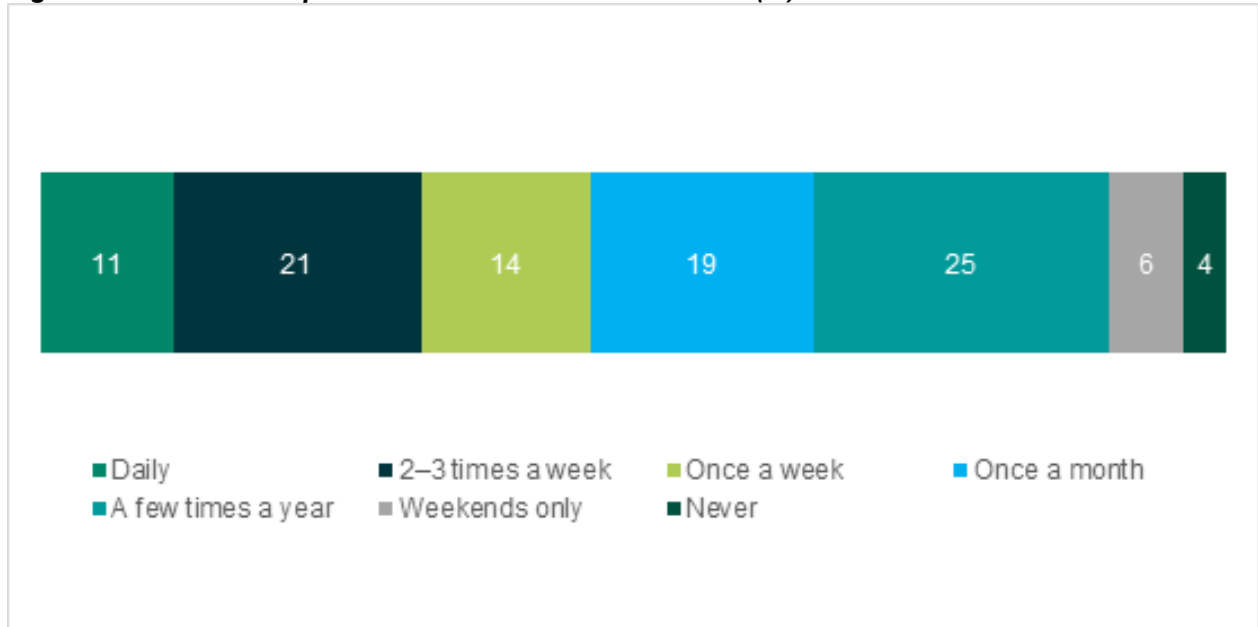
5.2 Current usage of the Blackwall Tunnel

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)

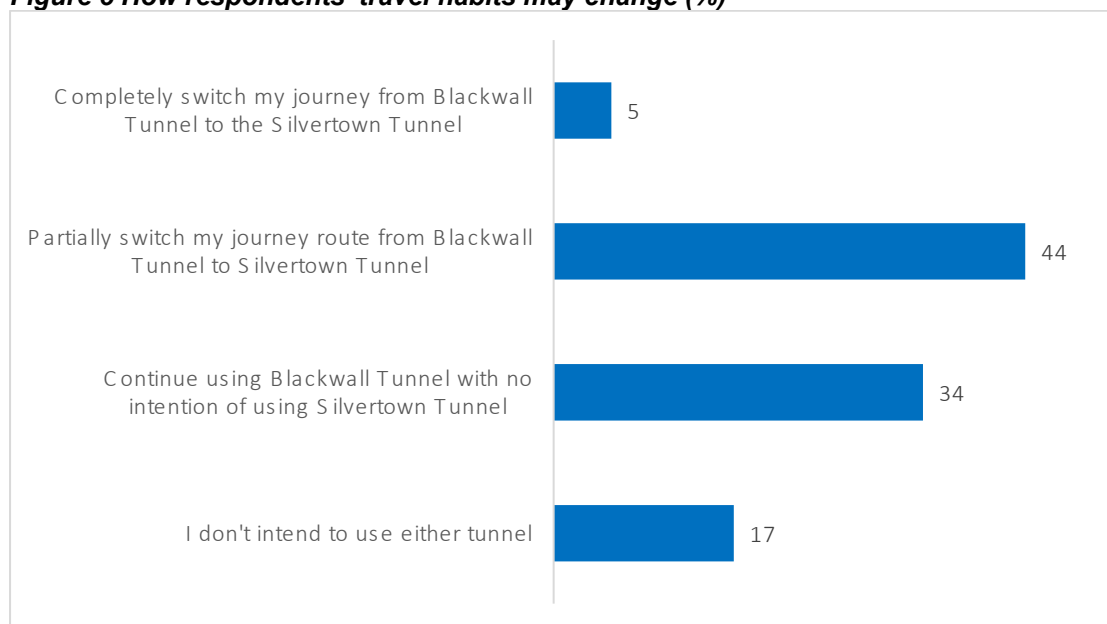
5.3 Future travel intentions when the Silvertown Tunnel opens

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 us 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

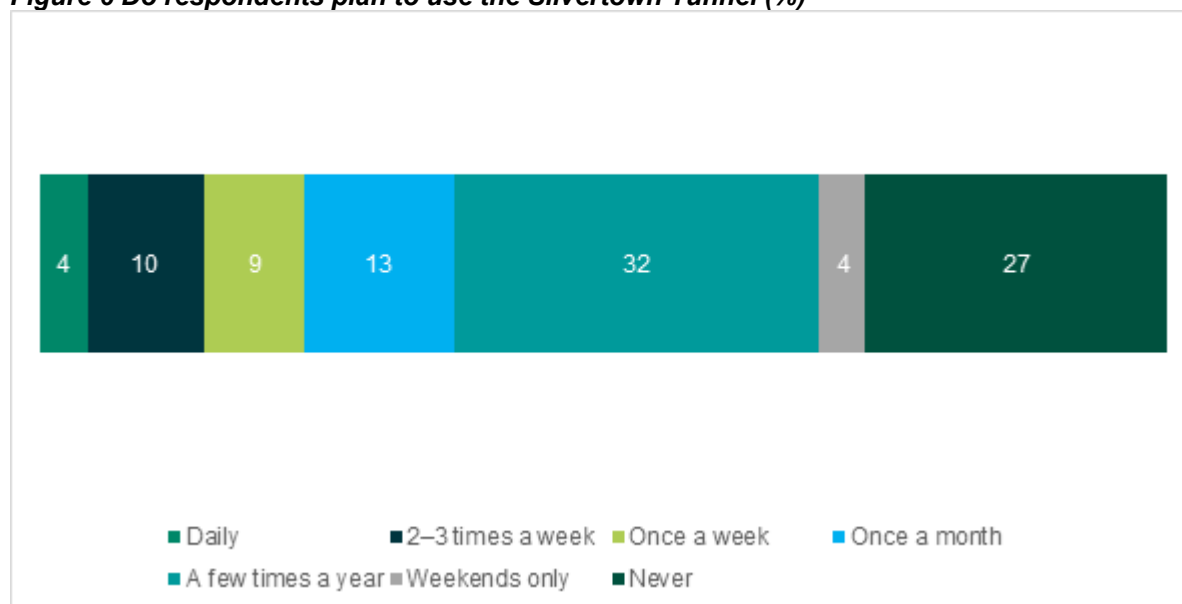
5.4 Intended usage of the Silvertown Tunnel when it opens

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

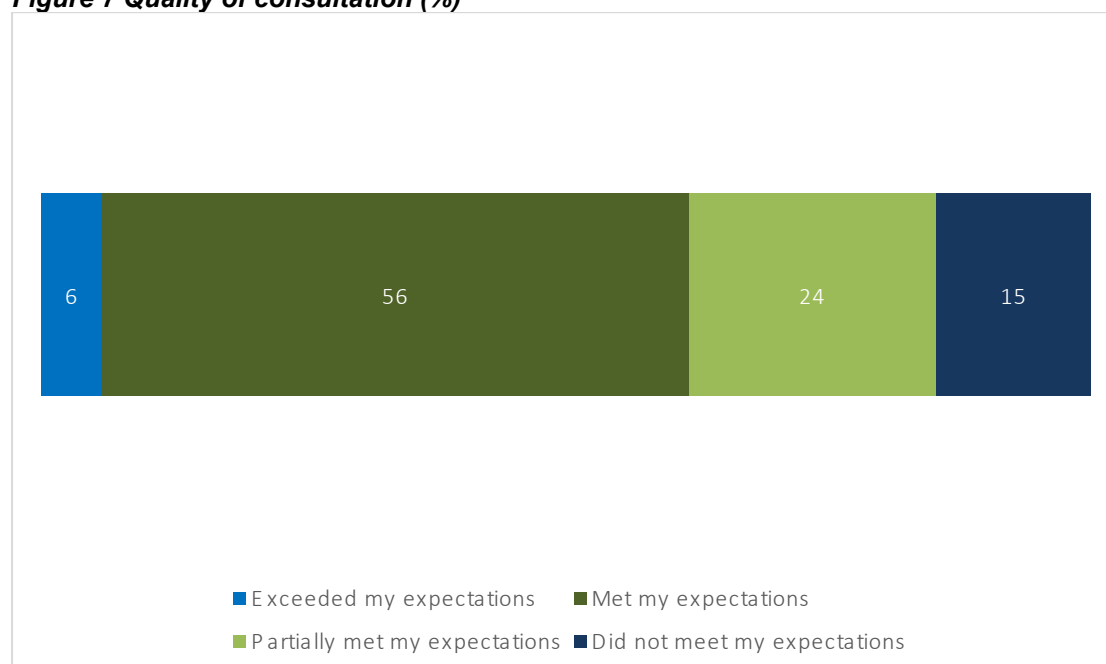
5.9 Quality of consultation questions

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 Pennycock 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.³ 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.

³ 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
Charges/charging - general support						
Support/agree with the proposed charges/support charging (general comment)	257	0	0	1	9	267
Charges/charging - general oppose						
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
Charges - should be higher generally						
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
Charges - should be lower generally						
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
Charging period						
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
Charges - other comments						
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
Off-peak charges - general support						
Support/agree with the proposed standard off-peak charges (general comments)	19	0	0	0	0	19
Off-peak charges - general oppose						
Oppose/disagree with the proposed off-peak charges/charging during off-peak (general comment)	45	0	0	0	1	46
Off-peak charges - should be higher						
Suggest proposed off-peak charges should be higher (general comment)	30	0	0	0	3	33
Off-peak charges - should be lower						
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
Peak charges - general support						
Support/agree with the proposed standard peak charges (general comments)	18	0	0	0	1	19
Peak charges - general oppose						
Oppose/disagree with the proposed peak charges/charging during peak (general comment)	42	0	0	0	1	43
Peak charges - should be higher						
Suggest proposed peak charges should be higher (general comment)	18	0	0	0	2	20
Peak charges - should be lower						
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
Autopay						
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
Penalty Charge Notice (PCN)						
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
Impact - general						
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
Impact - traffic						
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
Discounts - general comments						
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
Discounts - low-income residents						
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
Discounts - residents						
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
Discounts - £1 business discount on standard off-peak charges						
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
100% discounts						
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
Exemptions - proposed						
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
Exemptions - other suggestions						
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
Reimbursements						
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
General comments about consultation						
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
Survey questions						
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
Survey design						
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
Survey accessibility						
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
Other consultation comments						
Other comments about consultation/consultation material	54	0	0	0	5	59
Proposed green and fair package - supporting measures						
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
Other suggested improvements						
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
Other comments						
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)

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 about the condition of the Blackwall Tunnel/suggest it needs improving	5	0	0	0	0	5
Total respondents who provided a written comment	4877	120	31	56	97	5181

(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.	General Charges	
1.1.	Charges/charging – general oppose	
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 Project Objectives (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>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 User Charging Assessment Framework (UCAF) to identify how each scenario would contribute to successfully delivering the POs 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 POs delivering a large reduction in delay and congestion on tunnel approaches, while minimising the impact at nearby crossings. 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 Development Consent Order (DCO) made by the Secretary of State for Transport in 2018 and the associated Charging and Policy and Procedure (CPAP) 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 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.</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 DCO. However, this scenario would not have delivered the POs 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 boroughs⁴ 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 Section 6 of this report; and for exemptions and reimbursements see Section 7.</p>
1.2.	Charges - should be higher generally	
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 POs, the policies and procedures set out in CPAP, 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 UCAF 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>

⁴ 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 POs.</p> <p>The charge levels in the Assessed Case (which formed part of the DCO 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 PO5 (minimising the adverse impacts of the project) and PO6 (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 POs as set out in the UCAF.</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 (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 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>
1.3.	Charges - should be lower generally	
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 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.</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 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.</p> <p>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.</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></p> <p>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 POs 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 POs.</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.
1.4. Charging period		
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 CPAP. This entailed using the User Charging Assessment Framework (UCAF) to identify how each scenario would contribute to successfully delivering the POs.</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 POs 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 POs 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 POs (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 POs.</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 POs, 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 POs .
1.5. Charges - other comments		
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 POs.</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

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		<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 Section 1.1. 'Charges/charging – general oppose' we set out why user charges are necessary. The rationale for user charges is further set out in the consultation materials and other documentation which supported approval of the Silvertown Tunnel Order 2018 (DCO). 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 Project Objectives (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>
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 POs (Policy 1 of the CPAP), the other policies and procedures set out in CPAP, 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>

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		We have however been in regular discussion with National Highways, who is also a member of our statutory consultative group, STIG , 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 POs for the Silvertown Tunnel are set out in the CPAP and the power to build the project and apply user charges is conferred by means of a DCO.</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 CPAP as described in the Supplementary Information . The CPAP 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 POs.</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 POs.</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 DCO proposals we previously consulted on. When the DCO 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>

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		<p>project benefits would be lower and could be eroded over time and achievement of the POs would be compromised. Moreover, Policy 10 of the CPAP 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 POs 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>

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		<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 POs. 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 POs. 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 POs and congestion would continue.</p>

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		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 CPAP (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 POs . 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 CPAP also provides that the charge may be varied from time to time to account for inflation. The procedure described in 4.3 of the CPAP 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 CPAP . It includes why it is

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		fundamental for traffic demand management and to successfully deliver all the POs 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 Supplementary Information made available as part of the consultation. Charging only commercial vehicles would not enable us to manage demand effectively and meet the POs 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 POs at this time. In addition, Policy 2 of the CPAP states that TfL must ensure that user charges are fair, justified and will not undermine the POs.</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.

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		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 POs.</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 POs. 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 POs 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
2.	Off-peak Charges	
2.1.	Off-peak charges - general oppose	
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 EqIA. We considered a range of user charge levels to determine which would most effectively contribute to achieving the POs.</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 POs as set out in the UCAF.</p> <p>We have sought to minimise user charges to a level where we can still meet the POs as set out in the UCAF. For customers using Auto Pay, standard off-peak charges would apply most of the time</p>
2.2.	Off-peak charges - should be higher	
2.2.1	Suggest proposed off-peak charges should be higher (general comment)	As above – combined response.
2.3.	Off-peak charges - should be lower	
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 POs as set out in the UCAF and in the off-peak £1.50 is the lowest possible charge for any vehicle type without the risk of eroding the POs.</p>

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 POs (as per UCAF). Cars have the lowest user charges (alongside motorcycles) in the off-peak (£1.50).
3. Peak Charges		
3.1. Peak charges - general oppose		
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 POs.</p>
3.2. Peak charges - should be higher		
3.2.1	Suggest proposed peak charges should be higher (general comment)	As above – combined response.
3.3. Peak charges - should be lower		
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 POs (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 POs.</p> <p>The user charges have been set at a level where can still meet the POs (as per UCAF), balancing being fair and justified in the price set whilst achieving Policy 2.</p> <p>Please refer to Section 1 'General Charges' for additional information on our approach to charging:</p>

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Ref	Issue raised	Draft response
		<ul style="list-style-type: none"> • For charges being too expensive/should be lower generally, see response to issue 1.3.1 in Section 1 to this table. • 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. • For charges being too expensive/should be lower cars, see response to issue 1.3.2 in Section 1 to this table. • For charges being too expensive/should be lower small vans, see response to issue 1.3.2 in Section 1 to this table. • For charges being too expensive/should be lower large vans, see response to issue 1.3.2 in Section 1 to this table. • For charges being too expensive/should be lower for HGVs, see response to issue 1.3.2 in Section 1 to this table.
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.
4. Auto Pay		
4.1. Auto Pay		
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 DCO 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>

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		<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.
4.2. Penalty Charge Notice		
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>

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>
5. Impacts		
5.1. Impact – general		
5.1.1	Concern proposals/charging will negatively impact those on lower incomes	<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 EqlA provides further detailed assessment of the potential impact of our proposals on people on low-incomes. The EqlA also enables us to identify measures to mitigate impacts on local communities and the environment (PO5) and Policy 2.</p>

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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 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 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 & 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 EqIA 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>

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		<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 discount 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>

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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"> Those using their vehicles to carry any of the following: <ul style="list-style-type: none"> Bulky, heavy or fragile equipment/supplies Patients' notes or other confidential material Controlled drugs Clinical waste, contaminated sharps, radioactive materials or non-medicinal poisons Prescription-only medicines or waste medicinal products Clinical specimens, body fluids, tissues or organs OR Those responding to an emergency when on call.
5.1.8	Oppose/concern that the proposals unfairly target/penalise motorists	<p>The DCO 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 POs.</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>

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		<p>ensure that they are fair, justified and will not undermine the POs.</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 & 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.

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	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 forecasted 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>

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		<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>

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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>

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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.

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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 POs .
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>

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		<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 EqlA 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 EqlA 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>

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		Our EqIA provides further detailed assessment of the potential impact of our proposals on people from minority ethnic groups.
5.1.25	Concern about impact on local residents/communities/restriction on their travel	<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 & 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>
5.2. Impact - traffic		
5.2.1	Proposals will not encourage car users to use other forms of transport/reduce car use/is incompatible with the Mayor's Transport Strategy	<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>

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		<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>

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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 Mayor's Transport Strategy (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>

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		<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 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.</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 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.</p> <p>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.</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 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.</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>

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		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 POs.</p> <p>Within Policy 11 of the CPAP 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 CPAP, 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

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	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>

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		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.
Discounts		
6.		
6.1. Discounts - general comments		
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 POs, the policies and procedures set out in the CPAP, 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 CPAP 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 POs, 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 DCO and the CPAP , in particular, Policy 2 and the need for the charges including the discounts and exemptions to be fair, justified and not undermine the POs .

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		<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 POs, 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 CPAP 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 POs.</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 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.</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 CPAP: 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>

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		<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 Supplementary Information 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 POs.</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 POs. The process for any future changes is set out in the CPAP.</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 POs would be compromised. Moreover, Policy 10 of the CPAP 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 POs 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>

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		<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 POs. The process for any future changes is set out in the CPAP.</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>

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		<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 POs. The process for any future changes is set out in the CPAP.</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>
6.2.	Discounts - low-income residents	
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 CPAP. This entailed using the User Charging Assessment Framework (UCAF) to identify how each scenario would contribute to successfully delivering the POs including effective traffic demand management (and the associated economic and environmental impacts of this</p>

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		<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 POs whereas a zero-charge scenario performed badly.</p> <p>Policy 6 of the CPAP 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 POs.</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 POs. The process for any future changes is set out in the CPAP.</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"> • Income Support • Income-related Employment & Support Allowance • Income-based Jobseekers Allowance • Universal Credit • Pension Credit • Child Tax Credit • Housing Benefit • Working Tax Credit • Carer's Allowance <p>Further information on how to apply for this discount will be made available closer to the Silvertown Tunnel opening.</p>

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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 POs. The process for any future changes is set out in the CPAP.</p> <p>During our engagement with STIG 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 & 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>

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		<p>achieving the POs.</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 POs.</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>

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		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.
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 POs. Furthermore, private hire drivers on lower incomes may be eligible for a 50 per cent 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 2024⁵ (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 POs.</p>
6.2.9	Suggest teachers/those working in education should receive a discount	See our response to issue 6.1.10 above where we address this.
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 EqIA.</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>

⁵ [Licensing information - Transport for London \(tfl.gov.uk\)](https://tfl.gov.uk/road-traffic/licensing-information)

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		<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 DCO 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 CPAP which make achievement of the POs 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>

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		<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	Queries about whether proposed low-income residents' discount is required	<p>Policy 6 of the CPAP 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	Suggest proposed 50% discount for low-income residents should be extended beyond three years/should be applied for a longer period	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 POs .
6.2.14	Suggest other criteria for who qualifies for the proposed low-income resident discount	<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"> • Income Support • Income-related Employment & Support Allowance • Income-based Jobseekers Allowance • Universal Credit • Pension Credit • Child Tax Credit • Housing Benefit • Working Tax Credit • Carer's Allowance

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		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.
6.3. Discounts - residents		
6.3.1	Discounts should apply to all London residents (general comment)	<p>If a discount was applied to all London residents the POs 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	Suggest discounts should be for all residents local to tunnels/living in the surrounding area	<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	Suggest all east London residents should receive a discount (regardless of income)	<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>

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		us failing to achieve the POs , which we must consider in setting the user charges, discounts and exemptions.
6.3.4	Concern proposals are unfair as only offers discounts to east London residents/suggest should consider south London residents too	<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 POs.</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	Other comment about discounts for residents	<p>Policy 6 of the CPAP 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 POs.</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 POs. The process for any future changes is set out in the CPAP.</p>

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6.4.	Discounts - £1 business discount on standard off-peak charges	
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 DCO 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 STIG and stakeholders in order to propose the most suitable option in terms of achieving POs , compliance with the CPAP 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 DCO) 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 DCO 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 POs.</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 POs 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.
6.5.	100% discounts	

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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 POs .
6.5.2	Oppose/disagree with proposed 100% discount for vehicles with 9+ seats/they should be charged	<p>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 POs.</p> <p>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.</p>
6.5.3	Oppose/disagree with proposed 100% discount for Blue Badge holders/they should be charged	PO5 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 POs . 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	<p>Providing a 100 per cent discount for Blue Badge holders aligns with PO5, 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.</p> <p>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</p>

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		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 POs. 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 POs.</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 CPAP 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 POs.</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 POs.</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 POs and we will keep under review to ensure they continue to support achieving POs.</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

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		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 discounts 100%	<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 POs, including impacts on traffic, air quality and revenue.</p> <p>As required by Policy 11 of the CPAP we will keep our discounts and exemptions under review to ensure they continue to support achieving POs.</p>
7. Exemptions		
7.1. Exemptions - general comments		
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 POs, the policies and procedures set out in the CPAP, 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 DCO and the CPAP.</p>
7.2. Exemptions – proposed		
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 POs, the policies and procedures set out in the CPAP (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>

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		exemptions was provided in the Supplementary Information and the UCAF as part of the consultation materials .
7.2.2	Oppose/disagree with taxis (black cabs) not being charged/being exempt	<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 POs.</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.
7.3.	Exemptions - other suggestions	
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 POs.</p>

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		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.
7.3.2	Suggest zero-emission/less-polluting vehicles should not be charged/should be exempt	<p>This type of discount would have a negative impact on our ability to manage demand at the tunnels, and achieve the POs, 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 DCO 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	Suggest private hire vehicles (PHVs) should not be charged/should be exempt	See our response to issue 6.5.6 in Section 6 above where we address this issue.
7.3.4	Suggest motorcycles/mopeds/motor tricycles should not be charged/should be exempt	<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	Suggest residents local to tunnels/living in the surrounding area should not be charged/should be exempt	<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>

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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 through 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 POs as set out in the UCAF and in the off-peak £1.50 is the lowest possible charge for any vehicle type without the risk of eroding the POs .
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

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		<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 POs especially PO2 and PO5.</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 POs.</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>

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		<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 POs.</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 POs.</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 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 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 POs.</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>

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		<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.
7.4. Reimbursements		
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 POs.</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"> Those using their vehicles to carry any of the following: Bulky, heavy or fragile equipment/supplies Patients' notes or other confidential material Controlled drugs Clinical waste, contaminated sharps, radioactive materials or non-medicinal poisons Prescription-only medicines or waste medicinal products Clinical specimens, body fluids, tissues or organs <p>OR</p> <ol style="list-style-type: none"> Those responding to an emergency when on call. <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 POs.</p>

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		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.
8.	Other Improvements and Comments	
8.1.	Proposed green and fair package of concessions and discounts - supporting measures	
8.1.1	Suggest free cross-river cycle shuttle-bus provision should be made permanent	<p>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.</p> <p>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.</p>
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	<p>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.</p> <p>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.</p>
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

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		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.
8.2. Other suggested improvements		
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 Bus Strategy.</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 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).</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>

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		<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>

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		<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>

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		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 Mayor's Transport Strategy (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 DCO 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

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		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 'Case for the Scheme' 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>

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		<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

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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	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.
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>

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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.
9. Consultation		
9.1. General comments about consultation		
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: Silvertown Tunnel permission - Transport for London (tfl.gov.uk)</p>
9.2 Survey questions		
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.

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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.
9.3. Survey design		
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.
9.4. Survey accessibility		
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 proposals and survey were provided as part of our consultation materials. In addition, we created 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</p>

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Ref	Issue raised	Draft response
		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.
9.4.7	Criticism of survey inclusivity (general comment)	As above – combined response.
END		

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

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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.*

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4. *Value for money of tolls:* Generally, where tolls have been introduced for infrastructure projects elsewhere, it results in an improvement 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.

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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

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- ☐ 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

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☐ 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

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- ☐ 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.)

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- ☐ 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

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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	At all times
			Mon-Fri only	
			<i>Northbound 6am - 10am</i>	
			<i>Southbound 4pm-7pm</i>	
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

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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	<p>This discount applies to individuals who hold a valid Blue Badge in the European Economic Area.</p> <p>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.</p>

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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 PHVs designated as wheelchair-accessible vehicles 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.
Exemptions	
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.
Reimbursements [§]	
NHS Patient Reimbursement [¶]	<p>NHS patients are eligible for reimbursement if:</p> <ol style="list-style-type: none"> 1. Clinically assessed as too ill, weak or disabled to travel to an appointment on public transport, and any of following apply: Have a compromised immune system (problems with your immune system) Require regular therapy or assessment Require recurrent surgical intervention OR 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.
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 & 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 & 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
Email: 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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A5 leaflet


**Your river crossings.
Your say.**
Silvertown and Blackwall tunnels
user charge consultation.



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Consultation ends Tuesday 3 September 2024.

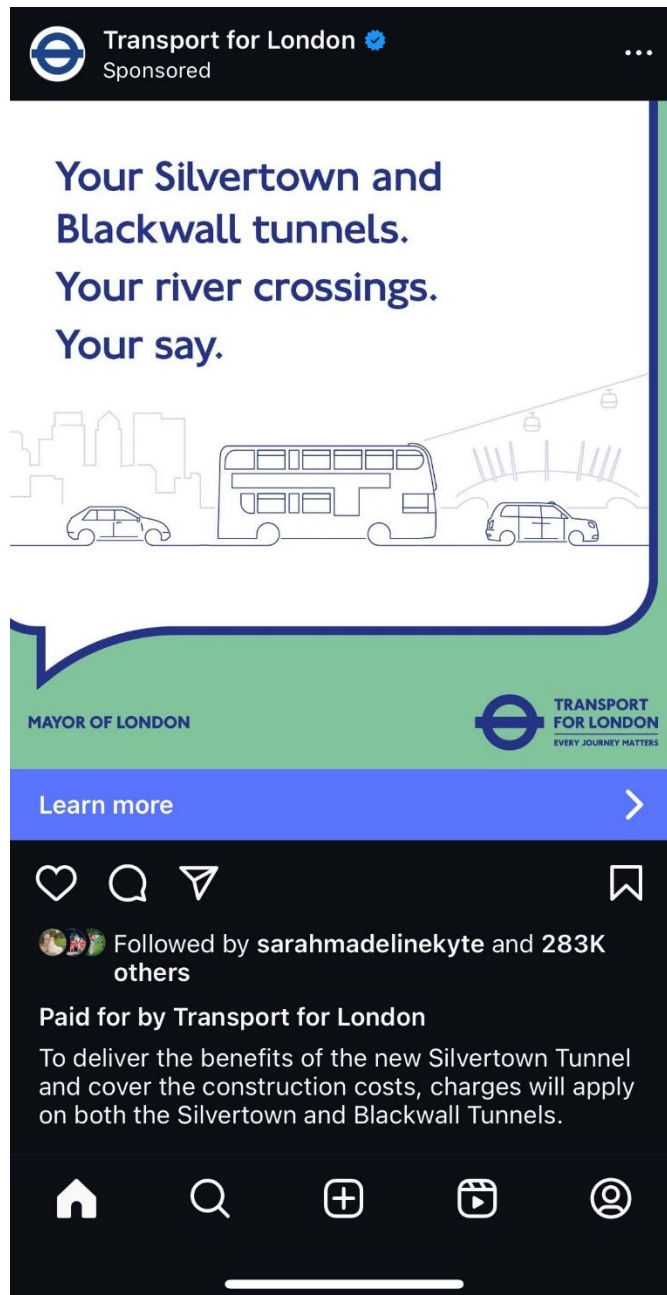


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Social media assets



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-focussed 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
Ansko 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

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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	Centrepont	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	Chrisp 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

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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

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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

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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

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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

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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

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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	LewishamFamily 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

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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	Marner Children's Centre	Marner 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

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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)

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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

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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

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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 GroupAssociation
Redbridge Disability GroupConsortium	Redbridge Pensioners Forum	Redbridge United Synagogue
RedbridgeFamilies 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)

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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

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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

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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

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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

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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

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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		