

Appendix 5

Silvertown and Blackwall Tunnels User Charges

Equality Impact Assessment

November 2024

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1 Acronyms and Abbreviations

- CO₂: Carbon Dioxide
- CPAP: Charging Policies and Procedures
- CQC: Care Quality Commission
- Db: Decibels
- DCO: Development Consent Order
- DLA: Disability Living Allowance
- DLR: Docklands Light Railway
- DWP: Department for Work and Pensions
- EHCP: Education Health and Care Plans
- EqIA: Equality Impact Assessment
- HEqIA: Health and Equality Impact Assessment
- IMD: Indices of Multiple Deprivation
- LB: London Borough
- LGBT: Lesbian, Gay, Bisexual, Transgender
- LSA: Local Study Area
- LSOA: Lower layer Super Output Area
- LTDS: London Travel Demand Survey
- NHS: National Health Service
- NO₂: Nitrogen Dioxide
- NO_x: Nitrogen Oxide
- ONS: Office for National Statistics
- PA: Personal Assistant
- PHV: Private Hire Vehicle
- PIP: Personal Independence Payment
- PM₁₀/PM_{2.5}: Particulate Matter
- PO: Project Objective
- PSED: Public Sector Equality Duty
- RB: Royal Borough
- SEND: Special Educational Needs and Disability
- STIG: Silvertown Tunnel Implementation Group
- TfL: Transport for London
- UCAF: User Charging Assessment Framework
- ZEC: Zero Emission Capable

2 Executive Summary

The Silvertown Tunnel scheme involves the construction of a twin-bore road tunnel under the Thames. This will provide a new road link between the A102 Blackwall Tunnel Approach on Greenwich Peninsula (London Borough of Greenwich) and the Tidal Basin Roundabout junction on the A1020 Lower Lea Crossing/Silvertown Way (London Borough of Newham).

A critical part of the Silvertown Tunnel scheme is the implementation of user charges on the Silvertown and Blackwall tunnels when Silvertown Tunnel opens in 2025 to manage traffic demand at the crossings and ensure the Scheme meets its objectives.

In order to understand the potential impacts arising from the proposed user charges on people from different groups, and to help fulfil our statutory duty under the Public Sector Equality Duty (PSED) and the Equality Act 2010, we have carried out an Equality Impact Assessment (EqIA) to identify any potential disproportionate or differential equality impacts on protected characteristic and disadvantaged groups, to enhance opportunities and to foster good relationships between those with a protected characteristic and those without.

Table 1 summarises the potential disproportionate and/or differential impacts identified as part of the assessment in Section 8.

Table 1: Summary of equality impact by group

Group	Relevant Topics	Summary
Age (Young People)	Accessibility (including access to community facilities ¹), access to work and training, air quality, noise, active travel, road safety, social capital	<p>No disproportionate or differential impacts identified.</p> <p>Young people in London are more likely to travel by bus and will benefit from proposed improvements to bus services cross-river. In addition to travel concessions provided under the green and fair package of concessions and discounts, young people may also be eligible for existing travel concessions for young people in London provided by us.</p> <p>Some young people may be reliant on travel as a car passenger for cross-river journeys, and due to the high levels of deprivation in the area, the user charge may present a financial barrier to travel, leading to changes in travel mode. This is considered to be offset by improvements to journey times and reliability, improvements to public transport provision, and the east London low-income residents' discount (subject to eligibility).</p>

¹ 'Community facilities' includes Education and Healthcare Facilities, Community Centres and Places of Worship

		<p>Young people may also be reliant on travel by community transport (Vehicles with 9+ seats), and the 100 per cent discount for these vehicles help ensure that services are not impacted.</p> <p>Young people are more vulnerable to the negative health impacts of poor air quality. The Scheme is forecast not to cause any exceedances of national air quality objectives. Due to the insignificant changes in NO₂ emissions forecast, there is not expected to be an overall disproportionate or differential impact.</p> <p>Young people may be more sensitive to negative health impacts of increased noise levels from vehicular traffic. However, there is no disproportionate or differential impact identified on people due to noise resultant of the Scheme.</p> <p>Children are disproportionately impacted by road danger in London, and walking and cycling are popular modes of travel for young people. However, no impacts on active travel and road safety due to changes in traffic levels on local roads resultant of the scheme have been identified.</p>
Age (Older People)	Accessibility (including access to community facilities), access to work and training, air quality, noise, active travel, road safety, social capital	<p>No disproportionate or differential impacts identified.</p> <p>Older people are less likely to travel by car as a driver than other age groups, however due to safety and security concerns some may prefer to travel by car cross-river. A large proportion of older people are on low incomes, and this may be exacerbated in the local area due to the high levels of deprivation. The user charge may present a financial barrier to travel, leading to changes in travel mode.</p> <p>Older people eligible for a Blue Badge can receive a 100 per cent discount on the user charges, and those with a vehicle in the disabled tax class will be exempt. Older people on low incomes may also be eligible</p>

		<p>for the east London low-income residents' discount.</p> <p>Older people travelling to eligible NHS appointments by private vehicle (as a driver or passenger) may be eligible for a reimbursement of the user charge if use of the tunnels is required to access their appointment(s).</p> <p>It is recognised that older people are at greater risk of digital exclusion than other age groups, meaning they may face barriers to signing up to Auto Pay, paying the user charge online and applying for concessions they may be eligible for. Customers are able to contact our call centre to carry out functions such as setting up a discount and setting up Auto Pay and are able to send in supporting evidence via post. Customers can also pay the tunnel charges via the automated telephony system without having to go online or download the app.</p> <p>Older people are more likely than other age groups to be in receipt of care provided by carers. If impacts on the provision of care cross-river were to arise, it could have a disproportionate negative impact on older people. Whilst we believe that the proposed concessions in addition to the improvements to journey times and reliability will help to offset any negative impacts, it is proposed that we effectively market the concessions which may be available to carers to them prior to Scheme opening, and review whether further support is required in line with Policy 15 of the Charging Policies and Procedures (CPAP) following tunnel opening.</p> <p>The 100 per cent discount for community transport (Vehicles with 9+ seats) helps to ensure that services provided by community and charitable organisations are not negatively impacted by the user charges.</p> <p>Older people may be eligible for travel concessions provided by us for travel pan-London. However, those not eligible for these who travel by public transport will benefit from the improvements to bus service provision</p>
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		<p>and speeds cross-river, and the travel concessions provided under the green and fair package of concessions and discounts for at least one year after Scheme opening. All of our buses are fully accessible, and those travelling in a wheelchair or mobility scooter travel for free.</p> <p>Some older people may be reliant on travel by taxi or private hire vehicles (PHVs) for cross-river journeys. The exemption for taxis helps ensure services are not negatively impacted. Due to the user charges for non-zero emission capable (ZEC) and non-wheelchair accessible (WAV) PHVs, there may be a potential increase in fares for these journeys. This impact is considered to be limited and offset by improvements to journey times and availability of alternatives, including the bus (with new and improved services cross-river) and taxis. Furthermore, the improvements in journey times and congestion may improve the availability of PHVs for cross-river trips.</p> <p>Older people are disproportionately affected by road danger in London. However, no impacts on road safety due to changes in traffic levels and speeds on local roads resulting from the scheme have been identified.</p> <p>Older people are more vulnerable to the negative health impacts of poor air quality. The Scheme is forecast not to cause any exceedances of national air quality objectives. Due to the insignificant changes in NO₂ emissions forecast, there is not expected to be an overall disproportionate or differential impact.</p>
Disability	Accessibility (including access to community facilities), air quality, noise, active travel, road safety, social capital	<p>No disproportionate or differential impacts identified.</p> <p>Disabled people are more likely to travel by bus than any other mode in London. However, it is recognised that some may face barriers to travel by public transport and may travel by car (as a driver or passenger) due to comfort, safety and security concerns.</p>

		<p>There is a recognised potential for disabled people to be on low incomes, and the user charge may present a financial barrier to travel for some. For those unable to switch modes due to the aforementioned barriers, this may lead to changes to cross-river travel, which may lead to negative impacts on accessibility, access to work and training and social capital for disabled people.</p> <p>To mitigate negative impacts on disabled people who may be reliant on cars for travel, we have proposed a 100 per cent discount for Blue Badge holders, and an exemption for vehicles in the disabled tax class. We have also proposed a 50 per cent discount on the user charges for people on low incomes through the east London low-income residents' discount.</p> <p>Disabled people travelling to eligible NHS appointments by private vehicle (as a driver or passenger) may be eligible for a reimbursement of the user charge if use of the tunnels is required to access their appointment(s).</p> <p>Overall, we believe that the potential negative impact is mitigated through our proposed discounts, exemptions and concessions, alongside the improvements to journey times and reliability.</p> <p>Some disabled people may face barriers to accessing online services such as signing up to Auto Pay, paying the user charge online and applying for concessions they may be eligible for. Customers are able to contact our call centre to carry out functions such as setting up a discount and setting up Auto Pay and are able to send in supporting evidence via post. Customers can also pay the tunnel charges via the automated telephony system without having to go online or download the app.</p> <p>Some disabled people may be in receipt of care provided by carers and are more likely to be receiving care than non-disabled people. If impacts on the provision of care cross-river were to arise, it could have a disproportionate</p>
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		<p>negative impact on disabled people. Whilst we believe that the proposed concessions in addition to the improvements to journey times and reliability will help to offset any negative impacts, it is proposed that we effectively market the concessions which may be available to carers to them prior to Scheme opening, and review whether further support is required in line with Policy 15 of the Charging Policies and Procedures (CPAP) following tunnel opening.</p> <p>The 100 per cent discount for community transport (Vehicles with 9+ seats) helps to ensure that services provided by community and charitable organisations are not negatively impacted by the user charges.</p> <p>Disabled people may be eligible for travel concessions provided by us for travel pan-London. However, those not eligible for these who travel by public transport will benefit from the improvements to bus service provision and speeds cross-river, and the travel concessions provided under the green and fair package of concessions and discounts for at least one year after Scheme opening. All of our buses are fully accessible, and those travelling in a wheelchair or mobility scooter travel for free. For those who would like to switch modes to using public transport, we offer a free travel mentor scheme to support people who would like to try making their journey by different modes on our network.</p> <p>Some disabled people may be reliant on travel by taxi or private hire vehicles (PHVs) for cross-river journeys. The exemption for taxis helps ensure services are not negatively impacted. Due to the user charges for non-ZEC and non-wheelchair accessible PHVs, there may be a potential increase in fares for these journeys. This impact is considered to be limited and offset by improvements to journey times and availability of alternatives, including the bus (with new and improved services cross-river) and taxis. Furthermore, the improvements in journey times and congestion may improve the availability of PHVs for cross-river trips.</p>
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		<p>Disabled people may be more sensitive to negative health impacts of increased noise levels from vehicular traffic. However, there is no disproportionate or differential impact identified on people due to noise resultant of the Scheme.</p> <p>Disabled people are more vulnerable to the negative health impacts of poor air quality. The Scheme is forecast not to cause any exceedances of national air quality objectives. Due to the insignificant changes in NO₂ emissions forecast, there is not expected to be an overall disproportionate or differential impact.</p> <p>Disabled people are disproportionately affected by road danger in London. However, no impacts on road safety due to changes in traffic levels and speeds on local roads resulting from the scheme have been identified.</p>
Pregnancy and Maternity	Accessibility (including access to community facilities), road safety, air quality, social capital	<p>No disproportionate or differential impacts identified.</p> <p>Pregnant and maternal people may prefer travel by car for comfort and safety purposes. Some may be eligible for the east London low-income residents' discount, and all will benefit from improved accessibility due to improved journey times and reliability, which may also lead to improved access to a greater range of facilities and lower risk of missing appointments. Some may also be eligible for the NHS Patient reimbursement scheme when travelling for medical appointments.</p> <p>Some pregnant and maternal people may prefer to use PHVs. Due to the user charges for non-ZEC and non-wheelchair accessible PHVs, there may be a potential increase in fares for these journeys. This impact may be offset by improvements to journey times and availability of PHVs for cross-river trips.</p> <p>Pregnant people and their unborn child are more vulnerable to the negative impacts of poor air quality. The Scheme is forecast not to cause any exceedances of national air</p>

		quality objectives. Due to the insignificant changes in NO ₂ emissions forecast, there is not expected to be an overall disproportionate or differential impact.
Race	Accessibility (including access to community facilities), air quality, noise, active travel, road safety, social capital	<p>There may be a potential negative impact on access to work and training for private hire drivers on low incomes who do not own a zero-emission capable (ZEC) or wheelchair accessible PHV. Due to the demographics of private hire drivers, this could have a potential disproportionate impact on people of Asian ethnicity. No additional mitigations are proposed to offset this impact as it is anticipated to reduce over time as vehicles are upgraded to meet licencing requirements and the industry is actively preparing for this transition. Private hire drivers on low incomes may also be eligible for the east London low-income residents' discount, or the business discount helping to offset the cost of the user charge.</p> <p>The Scheme is in an area of high racial diversity and high levels of deprivation, particularly north of the river, and there is an evidenced correlation between deprivation and areas with higher levels of racial diversity.</p> <p>The user charge may present a financial barrier to travel for some. This may lead to reductions and changes in cross-river travel, which may lead to negative impacts on accessibility, access to work and training and social capital. This is considered to be offset by improvements to journey times and reliability, improvements to public transport provision, and the east London low-income residents' discount (subject to eligibility).</p> <p>People from Black, Asian and Other Ethnic Group have a greater intention to use the Silvertown Tunnel at least once a week or more than White respondents, are more likely to use the bus, and more likely to use the Tunnel 2-3 times a week or more. London Travel Demand Survey (LTDS) data shows that Black Londoners are more likely to use</p>

		<p>the bus and less likely to travel by car or rail than other Londoners.</p> <p>Those that continue to or switch to travel by bus will benefit from proposed improvements to bus services cross-river. In addition to travel concessions provided under the green and fair package of concessions and discounts.</p> <p>LTDS data shows that Black Londoners are slightly more likely to use PHVs for travel than other ethnic groups. Due to the user charges for non-ZEC and non-wheelchair accessible PHVs, there may be a potential increase in fares for these journeys. This impact is considered to be limited and offset by improvements to journey times and availability of alternatives, including the bus (with new and improved services cross-river) and taxis. Furthermore, the improvements in journey times and congestion may improve the availability of PHVs for cross-river trips.</p> <p>Black, Asian and minority ethnic people are more likely to live in areas with poorer air quality in London. The Scheme is forecast not to cause any exceedances of national air quality objectives. Due to the insignificant changes in NO₂ emissions forecast, there is not expected to be an overall disproportionate or differential impact.</p> <p>Black, Asian and minority ethnic people may live in areas where noise pollution resultant of vehicular traffic is greater. However, there is no disproportionate or differential impact identified on people due to noise resultant of the Scheme.</p> <p>Some ethnic minority groups are disproportionately affected by road danger in London. However, no impacts on road safety due to changes in traffic levels and speeds on local roads resulting from the scheme have been identified.</p>
Religion or Belief	Accessibility (including access to community)	<p>The Local Study Area is religiously diverse. Some people may be reliant on the use of</p>

	facilities), social capital	<p>private vehicle for access to religious centres and services, and community events.</p> <p>The east London low-income residents' discount in addition to improved journey times and reliability, and improved bus speeds and service provision through the tunnels help to offset potential negative impacts on accessibility for people who make regular cross-river trips for religious purposes.</p> <p>Some people of different religions may benefit from the 100 per cent discount for community transport (Vehicles with 9+ seats) where this is required to attend community events or religious services.</p> <p>There may be a potential negative impact on access to work and training for private hire drivers on low incomes who do not own a zero-emission capable (ZEC) or wheelchair accessible PHV. Due to the demographics of private hire drivers, this could have a potential disproportionate impact on people of Muslim religion. No additional mitigations are proposed to offset this impact as it is anticipated to reduce over time as vehicles are upgraded to meet licencing requirements and the industry is actively preparing for this transition. Private hire drivers on low incomes may also be eligible for the east London low-income residents' discount, or the business discount helping to offset the cost of the user charge.</p>
Sex	Accessibility (including access to community facilities), access to work and training, social capital	<p>No disproportionate or differential impacts identified.</p> <p>The charge may present a financial barrier to for some people of either sex who frequently travel by private vehicle and are on lower incomes, including some women who may have concerns around using public transport due to fear of harassment. The potential negative impact on women who have concerns around public transport travel is considered to be minor and mitigated by the east London low-income residents' discount (subject to eligibility). Wider TfL transport policy improvements relating to safety and harassment on public transport may also help</p>

		<p>some women feel more comfortable travelling by public transport cross-river if they choose to switch modes.</p> <p>Additionally, improved journey times and improvements to cross-river public transport speeds and provision will help to mitigate potential negative impacts.</p>
Sexual Orientation and Gender Reassignment (LGBT)	Accessibility (including access to community facilities), social capital	<p>No disproportionate or differential impacts identified.</p> <p>Due to fear of harassment on public transport, some LGBT people may prefer to use a private vehicle or PHV to travel. Due to the user charges for non-ZEC and non-wheelchair accessible PHVs, there may be a potential increase in fares for these journeys. This impact is not considered to be disproportionate and is offset by improvements to journey times and availability of alternatives, including the bus (with new and improved services cross-river) and taxis. Furthermore, the improvements in journey times and congestion may improve the availability of PHVs for cross-river trips. Wider TfL transport policy improvements relating to safety and harassment on public transport may also help some LGBT people feel more comfortable travelling by public transport cross-river if they choose to switch modes.</p> <p>The potential negative impact of the user charges on LGBT people who have concerns around public transport travel is considered to be minor and mitigated by the east London low-income residents' discount (subject to eligibility) and the improved journey times.</p>
People on Low Incomes	Accessibility (including access to community facilities), access to work and training, air quality, noise, active travel, road safety, social capital	<p>The user charges may present a financial barrier for some people on low incomes, leading to changes in travel modes and frequency. This could impact accessibility, access to work and training, and social capital.</p> <p>This impact is mitigated through the proposed east London low-income residents' discount and improvements to bus services through the tunnels due to new and improved routes.</p>

		<p>In addition there are public transport travel concessions provided by TfL for Londoners on low incomes (subject to eligibility). Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London.</p> <p>There may be a potential negative impact on access to work and training identified for private hire drivers on low incomes who do not own a zero-emission capable (ZEC) or wheelchair accessible PHV. Due to the demographics of private hire drivers, this could have a potential secondary disproportionate impact on people of Asian ethnicity and the Muslim religion. No additional mitigations are proposed to offset this impact as it is anticipated to reduce over time as vehicles are upgraded to meet licencing requirements and the industry is actively preparing for this transition. Private hire drivers on low incomes may also be eligible for the east London low-income residents' discount, or the business discount helping to offset the cost of the user charge.</p> <p>People on low incomes are more likely to live in areas with poorer air quality in London. The Scheme is forecast not to cause any exceedances of national air quality objectives. Due to the insignificant changes in NO₂ emissions forecast, there is not expected to be an overall disproportionate or differential impact.</p> <p>People on low incomes may live in areas where noise pollution resultant of vehicular traffic is greater. However, there is no disproportionate or differential impact identified on people due to noise resultant of the Scheme.</p> <p>People from more deprived areas are disproportionately affected by road danger in London. However, no impacts on road safety due to changes in traffic levels and speeds on</p>
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		local roads resulting from the scheme have been identified.
Homeless People	Accessibility (including access to community facilities), air quality, noise, road safety, social capital	<p>No disproportionate or differential impacts identified.</p> <p>For some homeless people, the user charges may present a financial barrier, and some may face barriers to applying for Auto Pay. This could impact accessibility (including access to community facilities). However, the east London low-income residents' discount (subject to eligibility) in addition to improved journey times and reliability, and improved bus speeds and service provision through the tunnels help to offset potential negative impacts on accessibility for people who make regular cross-river trips.</p> <p>Homeless people may be more reliant on community transport provided by community or charitable organisations. The provision of a 100 per cent discount for community transport (Vehicles with 9+ seats) will benefit charities and organisations that support these groups and helps to ensure that these services are not reduced or cut due to the proposed user charges. These services will also benefit from reduced journey times and improved reliability due to the Scheme.</p>
Asylum Seekers and Refugees	Accessibility (including access to community facilities), air quality, noise, road safety, social capital	<p>No disproportionate or differential impacts identified.</p> <p>For some asylum seekers and refugees, the user charges may present a financial barrier, and some may face barriers to applying for Auto Pay. This could impact accessibility (including access to community facilities). However, the east London low-income residents' discount (subject to eligibility) and free (refunded) pay as you go cross river bus and certain DLR journeys (for at least the first 12 months) in addition to improved journey times and reliability, and improved bus speeds and service provision through the tunnels help to offset potential negative impacts on accessibility for people who make regular cross-river trips.</p>

		<p>Some asylum seekers and refugees may be more reliant on community transport provided by community or charitable organisations. The provision of a 100 per cent discount for community transport (Vehicles with 9+ seats) will benefit charities and organisations that support these groups and the individuals who they support and helps to ensure that these services are not reduced or cut due to the proposed user charges. These services will also benefit from reduced journey times and improved reliability due to the Scheme.</p>
Carers (paid, voluntary, informal and personal assistants)	Access to work and training	<p>There is potential for the user charges to impact on access to work and training for carers (voluntary, paid, informal and personal assistants) and care providers providing services cross-river. If this impact were to affect the provision of care, it could lead to negative impacts on social capital and accessibility for disabled people and older people, and access to work and training for disabled people. Changes to the provision of care by the voluntary and charitable sectors could negatively impact disabled people, older people, homeless people, and asylum seekers and refugees.</p> <p>Whilst we believe that our proposed discounts and exemptions together with the improvements to journey times and reliability will help to ensure these impacts do not arise, it is important that we monitor how the scheme is affecting cross-river care provision and seek to address these impacts should they arise (while continuing to meet the Project Objectives of the scheme). In line with Policy 15 of the CPAP, we will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening.</p> <p>Additionally, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended we provide targeted communications to raise awareness of the discounts, exemptions and free (refunded) pay as you go bus and certain DLR river crossings (for at least 12 months) that care providers or their clients may be entitled to as</p>

		well as the benefits of signing up for Auto Pay as part of our marketing plan.
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3 Introduction

In May 2018, a Development Consent Order (DCO) was granted by the Secretary of State for Transport for the construction of the Silvertown Tunnel under the Thames.

As part of the Scheme, user charges will be introduced at both Silvertown Tunnel and Blackwall Tunnel when the Silvertown Tunnel opens in 2025.

We must set the initial charges before the Silvertown Tunnel opens to traffic and have been following the processes and policies for setting these charges in line with the Charging Policies and Procedures (CPAP).²

We have undertaken an Equality Impact Assessment (EqIA) (this document) to identify any potential disproportionate or differential equality impacts on protected characteristic and disadvantaged groups arising from the proposed user charges. The document details the impacts identified and sets out the measures which may be required to reduce or mitigate these impacts where appropriate.

² [Silvertown Tunnel Charging Policies and Procedures \(2017\)](#)

4 Overview of Project

4.1 Background

The Silvertown Tunnel scheme (the Scheme) involves the construction of a twin-bore road tunnel under the Thames. This will provide a new road link between the A102 Blackwall Tunnel Approach on Greenwich Peninsula (London Borough of Greenwich) and the Tidal Basin Roundabout junction on the A1020 Lower Lea Crossing/Silvertown Way (London Borough of Newham).

The purpose of constructing the tunnel is to improve the reliability and resilience of the wider road network. At present, the Blackwall Tunnel – the main river crossing in the area, is frequently impacted by delays, congestion and closures. This leads to long tailbacks and increased journey times as drivers choose longer routes to avoid the tunnel.

The DCO for the Scheme was granted by the Department for Transport in May 2018. Construction commenced on the project in 2020, and the tunnel is planned to open in 2025.

The Scheme aims to reduce this chronic congestion experienced in east London today, improve journey times and keep traffic moving efficiently. When the Silvertown Tunnel opens it will help to:

- Reduce delays and queues at the Blackwall Tunnel, with journey times up to 20 minutes faster;
- Reduce the environmental impact of traffic congestion on some of London's most polluted roads;
- Provide more opportunities to cross the river by public transport with a network of zero-emission buses (at the tailpipe) offering new routes and better access to more destinations.

A critical part of the Scheme is the implementation of user charges on the Silvertown and Blackwall tunnels when Silvertown Tunnel opens.

The DCO confers a general power on us to impose user charges at the Silvertown and Blackwall tunnels. This power provides scope to set all aspects of the proposed user charges including the charge levels, and stipulating the hours during which the charge shall apply, the vehicles charged, the discounts and exemptions granted and other related criteria.

The primary function of the user charges is to enable the management of traffic demand for the river crossing. By managing this traffic demand, the other effects of the Scheme can be effectively managed and the Project Objectives (PO) met. The Project Objectives are as follows:

- PO1: to improve the resilience of the river crossings in the highway network in east and southeast London to cope with planned and unplanned events and incidents;
- PO2: to improve the road network performance of the Blackwall Tunnel and its approach roads;

- PO3: to support economic and population growth, in particular in east and southeast London by providing improved cross-river transport links;
- PO4: to integrate with local and strategic land use policies;
- PO5: to minimise any adverse impacts of any proposals on communities, health, safety and the environment;
- PO6: to ensure where possible that any proposals are acceptable in principle to key stakeholders, including affected boroughs;
- PO7: to achieve value for money and, through road user charging, to manage congestion.

The user charges also provide a means of helping to pay for the design and construction and operation of the Scheme.

The user charges need to be applied at both the Silvertown and Blackwall tunnels to achieve the Project Objectives and realise the Scheme benefits. Further information on the requirement for user charges at Silvertown and Blackwall tunnels is contained within the Supplementary Information document published during our public consultation on the proposed user charges.

4.2 Setting the Initial User Charges

4.2.1 The Assessed Case

The DCO gives us the power to set the user charges prior to Silvertown Tunnel opening and to make subsequent variations to the user charges.

The DCO application was based on our Assessed Case, which set out a scenario of proposed charges, discounts and exemptions which would enable us to meet the Project Objectives.

The Assessed Case had been developed along with a number of alternative scenarios and sensitivity tests in readiness for the submission of the DCO application in spring 2016. It was based on our understanding and forecasting of the likely conditions at Scheme opening. The Assessed Case enabled us, the examiners, stakeholders and the public to understand the likely impacts of the Scheme based on current assumptions about traffic and its impacts.

Part of the Assessed Case was the set of user charges and associated parameters, based on 2015 prices.

It was recognised at the time that there would be a need to refresh the assumptions in the Assessed Case prior to scheme opening, by re-running the relevant transport and environmental models and carrying out up to date analysis.

This update – known as the Refreshed Assessment – is now complete, and the process we followed is described below. This update has led us to revise the proposed user charges and these are now the subject of this consultation.

Further information can be found in the Supplementary Information document.

4.2.2 Assessing the equality impacts of the user charges in the Assessed Case

A Health and Equality Impact Assessment³ (HEqIA) formed part of the suite of documents prepared to accompany the DCO Application for the Scheme. This assessed the impact of the Scheme during its construction and operation – based on the indicative user charges in the Assessed Case.

In relation to the equality impacts of the operation of the Scheme, the following potential disproportionate/differential equality impacts were identified for the indicative user charges:

- *Low-income households may be disproportionately affected as a result of the user charge. This may be offset by improvements to public transport.*

At the time of the HEqIA, no discounts or exemptions were proposed for people on low incomes. However, in 2016 when Sadiq Khan was elected Mayor of London, he undertook a review of the scheme (which at the time was part of a river crossings in east London programme). As well as affirming his support for the Scheme, at the time the Mayor announced various amendments related to the user charges, including a minimum of 50 per cent discount for host borough residents on a low income for the duration of the three-year monitoring period.

4.2.3 Reviewing the Assessed Case

Prior to the Silvertown Tunnel opening in 2025, and in line with Article 53 of the DCO, we have reviewed the user charges proposed for the Scheme.

In accordance with the CPAP, we have re-run the strategic traffic model (applying monitored data) taking into consideration the proposed user charges and carried out additional analysis. The outputs of this modelling and analysis have then been used to assess the effects of the proposed initial user charges on air quality, noise, socio-economic effects, in accordance with the approach adopted in the Environmental Statement submitted as part of the DCO.

Table 2 sets out the proposed user charges, and Table 3 sets out the proposed discounts and exemptions.

³ [Silvertown Tunnel Health and Equalities Impact Assessment \(April 2016\)](#)

Table 2: Summary of proposed charge levels

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

Discounts require annual renewals (with provision of relevant proofs or registration fees) except Blue Badge holders who are granted their discount in line with the expiry of their badge (up to three years from point of issue).

Table 3: Proposed discounts, exemptions and reimbursements for the Silvertown and Blackwall tunnels user charges

Discounts, exemptions and reimbursements	Eligibility Criteria
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 ¹ and be in receipt of certain benefits ² .
£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 off-peak charges.
100 per cent Discount	
Recovery and breakdown vehicles	This discount applies to recovery and breakdown vehicles operated by organisations in the European Economic Area that are accredited to BS EN ISO9001:2008 (and in accordance with the specification for applying that standard to the industry).
Vehicles with 9+ seats	This discount applies to vehicles with nine seats or more (vehicles registered with the DVLA as a minibus, bus or coach will automatically receive a discount and will not need to apply for the discount).
Blue Badge holders	This discount applies to individuals who hold a valid Blue Badge in the European Economic Area. Individuals can register up to two vehicles that would be used to travel through Silvertown or Blackwall Tunnels. This could be their own vehicle, or one they travel in.
Certain operational vehicles	This discount applies to qualifying organisations that operate vehicles performing certain essential public services including certain services provided by the host boroughs ³ . Eligibility is determined by TfL.

Waste collection and waste disposal vehicles used by east London boroughs ⁴	This discount applies to vehicles being used by east London boroughs to provide waste collection and disposal services. Eligibility is determined by TfL.
Zero-Emission Capable and Wheelchair Accessible private hire vehicles (PHVs)	This discount applies to PHVs designated as wheelchair-accessible vehicles or zero emission capable as long as they are fulfilling a private hire booking and are licensed with London Taxi and Private Hire.
Exemptions	
Taxis	This exemption applies to taxis which are licensed with London Taxi and Private Hire.
Emergency services vehicles exempt from vehicle tax	This exemption applies to emergency service vehicles which are exempt from vehicle tax including ambulances, police vehicles and fire engines.
NHS vehicles exempt from vehicle tax	This exemption applies to NHS vehicles that are exempt from vehicle tax.
Vehicles in the disabled tax class	This exemption applies to vehicles used by disabled people that are exempt from vehicle tax.
Military vehicles in use	This exemption applies to vehicles currently used by the armed forces including visiting services or international organisations.
Reimbursements⁵	
NHS Patient Reimbursement ⁶	<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: <ul style="list-style-type: none"> • Have a compromised immune system (problems with your immune system) • Require regular therapy or assessment • Require recurrent surgical intervention <p>OR</p>

	2. During an epidemic or pandemic prevalent in Greater London, are clinically assessed as being too vulnerable to infection to travel to an appointment on public transport.
NHS Staff Reimbursement	<p>NHS staff members, are eligible for reimbursement if any of the following criteria is met:</p> <p>1. Those using their vehicles to carry any of the following:</p> <ul style="list-style-type: none"> • 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> <p>2. Those responding to an emergency or other extraordinary circumstances when on call.</p>

It is proposed that the resident discount is a 50 per cent discount available to eligible residents in receipt of certain low-income benefits of east London boroughs⁴ (east London low-income residents' discount).

The proposed qualifying benefits are:

- Income Support
- Income-related Employment & Support Allowance
- Income-based Jobseekers Allowance
- Universal Credit
- State Pension Credit
- Child Tax Credit

⁴ London Borough of (LB) Barking & Dagenham, LB Bexley, LB Bromley, City of London Corporation, Royal Borough of (RB) Greenwich, LB Hackney, LB Havering, LB Lewisham, LB Newham, LB Redbridge, LB Southwark, LB Tower Hamlets, LB Waltham Forest

- Housing Benefit
- Working Tax Credit
- Carer's Allowance

Alongside these proposals sits a green and fair package of concessions and discounts to support local residents and businesses to shift to more sustainable alternatives and adapt to the new user charge. This package includes:

- New buses, with 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times (15 in the Silvertown Tunnel, six in the Blackwall Tunnel) including the Superloop bus route SL4
- A regular cross-river cycle shuttle-bus through the Silvertown Tunnel for cyclists, free for at least 12 months following Scheme opening
- Bus concessions to provide free pay as you go trips to support local residents to use the new cross-river bus services which will run through the tunnel (Route 108, 129 and SL4) for at least 12 months following Scheme opening
- DLR concessions to provide free pas as you go trips (refunded) to support local residents making journeys from King George V - Woolwich Arsenal and Island Gardens - Cutty Sark for at least 12 months following Scheme opening
- Eligible small businesses, sole traders and charities based in the host boroughs can register a maximum of three vehicles to receive a £1 discount on standard off-peak charges.

4.3 Purpose of EqlA

Assessing the impact of the proposed user charges in an EqlA enables us to understand how different groups are impacted and helps us to ensure inclusion and people are at the heart of our decision-making. It is also a way to demonstrate that we have complied with our statutory duty under the Equality Act 2010 – the Public Sector Equality Duty (PSED). The purpose of the EqlA is to assess the equality impacts (positive and/or negative) of the proposed user charges on people with protected characteristics.

As a public authority, we must ensure that decisions, policies, and projects do not unlawfully discriminate against any protected characteristics, to enhance opportunities and to foster good relationships between those with a protected characteristic and those without. The Equality Act identifies nine protected characteristics:

- Age
- Disability
- Sex
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion or belief
- Sexual orientation
- Marriage and civil partnerships

Marriage and Civil Partnership is not a relevant protected characteristic for the purposes of s. 149(1)(b)-(c) and has therefore not been included in this EqlA. While we have a duty to consider this protected characteristic, it is limited in application to discrimination in work and employment.

As a functional body of the Greater London Authority we have also considered the wider impacts of the Scheme on other groups who are disadvantaged in London, including:

- People on low incomes
- Refugees and asylum seekers
- Homeless people
- Carers (paid, voluntary, informal and PA's)

As a public authority, we have obligations under s.149 of the Equality Act, the PSED. The PSED requires that we have due regard to the need to:

- Eliminate unlawful discrimination, harassment, victimisation, and any other conduct prohibited by or under the Act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it by:
 - removing or minimising disadvantages experienced by people that are connected to that protected characteristics;
 - taking steps to meet the needs of people with protected characteristics that are different from the needs of people without the characteristic; and
 - encouraging people with protected characteristics to participate in public life or other activities in which participation by such people is disproportionately low.
- Foster good relations, between people who share a 'protected characteristic' and people who don't.

4.3.1 Role of EqlA in Setting the User Charges

As stated in Section 4.2.3 it is a requirement of the CPAP for the initial user charges to be set taking into consideration updated traffic modelling and analysis, and then re-assessing the impacts of the proposed initial user charges on achieving the Project Objectives. This has been done through the use of the User Charging Assessment Framework (UCAF). The UCAF has been used to help set the initial user charges, and has enabled us to assess the extent to which the proposed user charges are likely to:

- Achieve the Project Objectives; and
- Enable us to fulfil our other duties, including:
 - TfL's network management duty under the Traffic Management Act 2004
 - Compliance with other relevant legislation

The UCAF provides a means of assessing the potential user charges with regard to their impact on the Project Objectives.

Further information on the UCAF is contained in the [Supplementary Information](#) document.

As set out in Section 4.3, it is a requirement for us to have regard to our statutory duties under the PSED. An EqlA is a way to demonstrate compliance with these duties. The conclusions inform the UCAF and demonstrate compliance with 'other relevant legislation' when setting the proposed user charges.

Conversely, the findings of the UCAF in relation to the impact on the Project Objectives and the relevant assessment metrics inform the assessment undertaken as part of this EqlA.

Further information on how the EqlA feeds into the decision making on setting the proposed user charges can be found in the [Supplementary Information](#) document.

5 Consultation

Prior to the submission of the DCO application, a statutory consultation on the scheme took place (the Consultation Report for this formed part of the application). This was itself preceded by several non-statutory consultations starting in 2012 and has been followed by consultations on the bus network and provision for cyclists.

Further information on these consultations can be found in the [Supplementary Information](#) document.

The responses relating to equality received during the previous consultations were reviewed as part of the work in setting the proposed user charges.

As part of the process to set the initial user charges, a public consultation ran for eight weeks from 10 July 2024 to 3 September 2024 which sought views on the proposed initial user charges levels and our approach to discounts and exemptions.

A draft version of this EqlA was one of a number of documents which was published as part of this consultation, which were published on the dedicated [consultation webpage](#). The responses to this consultation were reviewed to inform the final decision on the user charges, taking into consideration the matters raised by protected characteristic and disadvantaged groups.

Furthermore, engagement was held with communities, stakeholders and organisations representing local residents, businesses, and protected characteristic and disadvantaged groups. This engagement alongside the responses received during the public consultation has been analysed and inform the final decision on the proposed user charges.

Full detail on the consultation we undertook, the stakeholders consulted and engaged with, and analysis of responses received is contained within our consultation report, which can be found on our [consultation webpage](#).

6 Impact Assessment Methodology

6.1 Scoping

6.1.1 People Scope

As discussed in Section 4.3, we have a duty under the PSED to look at the potential impact of proposals, policies and decisions on the protected characteristic groups under the Equality Act 2010. Additionally, as a functional body of the Greater London Authority, we need to consider the potential impact on people who are disadvantaged in London.

Taking these requirements into consideration, and how the proposed user charges could result in a change which has a disproportionate or differential effect on those people with a protected characteristic and disadvantaged groups in London, the following have been concluded as in scope for assessment as part of this EqlA (Table 4). As stated in Section 4.3, Marriage and Civil Partnership is not a relevant protected characteristic for the purposes of s. 149(1)(b)-(c) and has therefore not been included in this EqlA.

Table 4: People Scope

People Groups
Age
Disability
Religion or Belief
Gender Reassignment
Pregnancy & Maternity
Race
Sex
Sexual Orientation
People on low incomes (household income less than £20,000 per year)
Homeless People
Asylum Seeker & Refugees
Carers (paid, voluntary, informal and personal assistants)

6.1.2 Spatial Scope

The Spatial Scope for this EqIA, as set out in Table 5 has been chosen to correspond with the areas identified in other assessments at DCO stage (the Local Study Area and Wider Borough Area), as well as factoring in the boroughs which make up the Silvertown Tunnel Implementation Group (STIG) and which have been considered as eligible for potential discounts (Sub-Region).

Table 5: Spatial Scope

Zone	Description
Local Study Area (LSA) (Figure 1)	Lower layer Super Output Areas (LSOAs) at the northern and southern portals, extending approximately 1km from each portal.
Host Borough Area (Figure 2)	The Host Borough Area comprises the three host boroughs of London Borough (LB) Newham, LB Tower Hamlets and Royal Borough of Greenwich.
Sub-Region (Figure 3)	The Sub-Region includes, in addition to the three host boroughs, the LBs of Barking and Dagenham, Bexley, Bromley, City of London, Southwark, Hackney, Havering, Lewisham, Redbridge and Waltham Forest.

Figure 1: Local Study Area Map

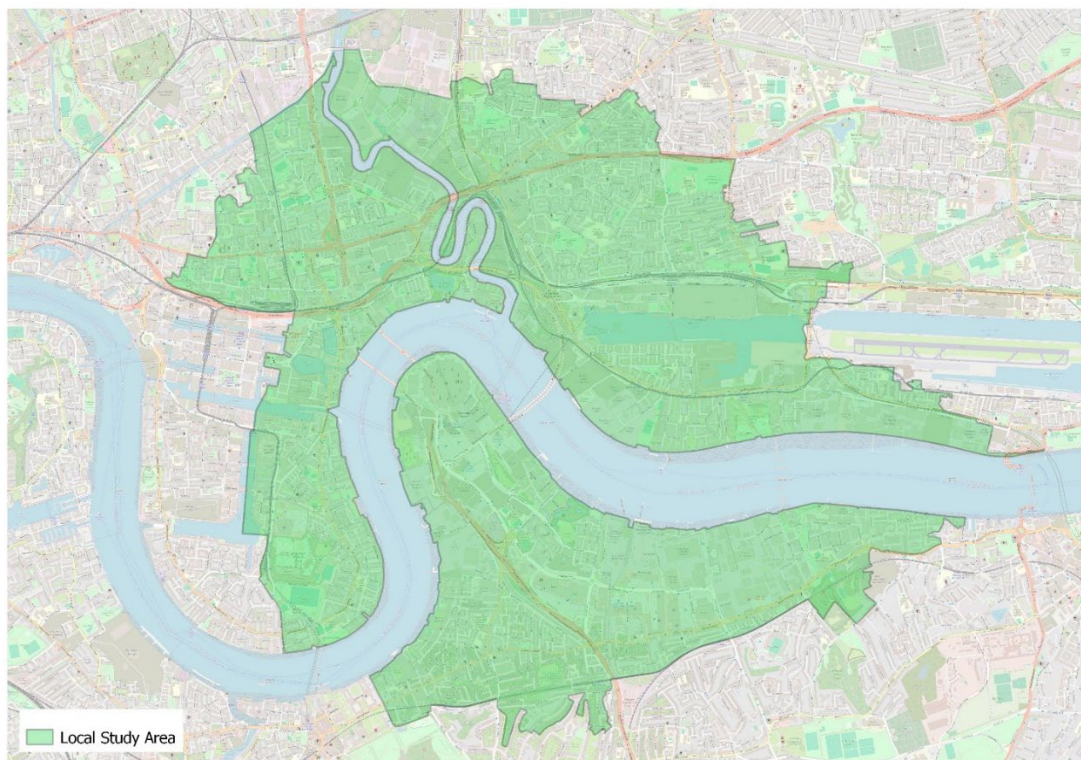


Figure 2: Host Boroughs Map



Figure 3: Sub-Region Map



6.2 Evidence Base

Baseline data has been collated from a range of sources to provide an overview of the characteristics of the different areas. It also includes research into the travel behaviour of specific groups. It includes journey purposes for certain groups to examine how it may differ from that of other groups and the wider population, to understand how the proposed initial user charges could affect certain groups with protected characteristics.

This provides an understanding of the local area and its facilities. Data on the community, health, and educational facilities within the LSA has been collated.

This provides greater context on the local communities surrounding the Silvertown and Blackwall tunnels and whether access to these facilities could be impacted by the initial user charges for certain groups.

Chapter 7 provides an analysis of this data.

Data has been gathered from a range of sources which provide accurate data on different protected characteristic and disadvantaged groups at the relevant spatial scales. Sources include:

- ONS Census data
- Indices of Multiple Deprivation
- DWP data
- London Travel Demand Survey (LTDS) data

Secondary research has also been undertaken to gather data and evidence on protected characteristic and disadvantaged groups from sources such as government publications, and publications and research by representative bodies, advocacy groups and charitable organisations. All sources of evidence have been provided in the footnotes where such data and evidence are presented.

6.3 Assessment Framework

As set out in Section 4.3, this EqlA is an assessment of the potential equality impacts of the proposed user charges including parameters such as charge levels (Table 2) and discounts and exemptions (Table 3).

The user charges manage demand at the tunnels and mitigate against the impacts of increased traffic and emissions on local communities, including those with protected characteristics and disadvantaged groups. This EqlA has reviewed the topics which were assessed in the HEqlA undertaken for the DCO application and considered which of these topics are relevant to assess the equality impacts of the initial user charges. This will help us to understand the impacts which could be experienced by protected characteristic and disadvantaged groups.

The topics set out in Table 6 have been determined as in scope for assessing the potential equality impacts of the proposed user charges:

Table 6: Assessment Topics Scope

Topic	Justification
Accessibility	<p>Accessibility affects how people live, socialise, spend recreation time, access services and work. These activities have a direct link to health and wellbeing.</p> <p>The range, availability, efficiency and affordability of transport modes to access key facilities are important, and the proposed user charges could potentially influence these.</p>
Access to Work and Training	<p>Access to work and training can have beneficial impacts on both the health and life prospects of local populations. The Scheme is located within some of the most economically deprived areas of London, with high levels of unemployment and people on low incomes.</p> <p>The proposed user charges aim to manage demand which should cause reductions in congestion and journey times for users of the tunnels. There is also the potential for the financial impacts of the proposed user charges to influence the ability for some groups to access work and training by certain modes. However, improvements to public transport may provide some mitigation.</p>
Access to Community Facilities	<p>Access to community facilities is important, particularly for multiple protected characteristic and disadvantaged groups. Community facilities can include Education and Healthcare Facilities, Community Centres, and Places of Worship. If the proposed user charges impact access to these facilities it could result in negative outcomes for impacted populations.</p>
Active Travel	<p>The proposed user charges may impact the mode people choose to travel by and could lead to an increase in walking and cycling, including as part of public transport journeys.</p> <p>The affordability of the charges could impact the use of active travel for certain groups to a greater extent than others.</p> <p>Changes in traffic levels and speeds resulting from the proposed user charges may impact perceptions of safety in certain locations and cause reductions in active travel, which may impact certain groups due to the location of these changes.</p>
Air Quality	<p>The Scheme aims to reduce congestion as a result of the provision of a new tunnel and to control increases in traffic through user charging. Changes in air quality can have a direct effect on exposure to pollutants and thereby the health and well-being of populations, including vulnerable populations and particular, groups with protected characteristics.</p>

Noise	Noise levels along key routes – both improvements to the current situation as well as increases in noise could occur as a result of the scheme and proposed user charges. These changes may occur in locations which result in a greater impact on certain protected characteristics or disadvantaged groups.
Road Safety	Changes in traffic volume and patterns as a result of the proposed user charges may impact road safety. Vulnerable populations and equality groups may be particularly sensitive to changes in road safety.
Social Capital	Changes to social capital e.g. social links, networks, participation and satisfaction with living in an area could result due to the impact of the proposed user charges. The proposed user charges may impact severance as well as changes to the amenity of the area for local residents (for example from changes in noise and air quality).

Topics scoped out which were in scope for the HEqIA include access to open space and nature. This is because this topic was assessed for its impacts to/on access to existing areas of open space during the construction of the Silvertown Tunnel.

The topic of safety has also been amended to only assess road safety. In the HEqIA, the wider topic of 'safety' included both road safety and community safety as a result of changes to the local environment in the vicinity of the tunnel (for example lighting, CCTV). The latter has been scoped out as it is only relevant to the construction and design of the Silvertown Tunnel, not the user charges.

6.4 Quantification of Effects

To capture the effects on equality groups, the assessment has identified whether the impact is likely to have a disproportionate or differential effect, described as follows:

- **Disproportionate** – where there is a proportionately greater impact on members of an equality group than on other members of the general population in a particular area.
- **Differential** – an impact which affects members of an equality group differently from the rest of the general population because of specific needs or a recognised vulnerability.

The overall effect of the equality impacts identified will be measured against the following scale:

Table 7: Scale of overall effect of equality impact

Scale of overall impact	Negative	Neutral	Positive
Rating	-1	0	+1

7 Baseline

This Chapter sets out a description of the LSA north and south of the river. The Silvertown Tunnel will provide a new link connecting communities both sides of the river improving connectivity to jobs, services and community facilities.

This chapter also sets out an analysis of socio-economic and equality data within the LSA, host boroughs and the wider sub-region. This has been used to provide a summary of protected characteristic and disadvantaged groups and help to identify key issues.

7.1 Local Study Area Profile

Both the northern LSA and southern LSA comprise of a range of residential, commercial and industrial land uses, and are crossed by major road and rail infrastructure. The River Thames forms a further corridor of activity (both commercial and recreational) which causes severance between the two areas.

7.1.1 The northern LSA

The northern LSA is dominated by the Royal Docks, which includes Gallions Point Marina, the ExCel Centre, the University of East London campus and London City Airport. Population in the vicinity of the Royal Docks area is focused in Silvertown, Canning Town and North Woolwich. The A1020 and A112 run west/east through this area, with primarily industrial and port related uses to the south and housing to the north. There is a local centre on the north side at Custom House. Silvertown Way (A1020) separates residential areas and the local centre from the Custom House DLR station.

Britannia Village, a residential area is located to the west of Silvertown. The Woolwich Ferry crosses the River Thames providing a link for cars, pedestrians and cyclists. Areas of public open space include the Royal Victoria Gardens and the Thames Barrier Park.

Residential areas to the north of the Royal Docks are focused at Custom House and Canning Town. Canning Town is bounded by Victoria Dock Road to the south and the A1011 to the west. Freemasons Road, which runs north/south through Canning Town is a local centre, with shops, cafes and businesses along much of its length. The A124 (Barking Road) provides a local shopping centre with a range of services and facilities. The River Lea, which heads north from the River Thames, is flanked by industrial uses on its eastern side. The DLR passes through Poplar with stations at Langdon Park, All Saints, Blackwall and East India.

The A13 East India Dock Road passes east/west through the Poplar area. West of its junction with the A102, the A13 acts as a busy community artery, with cafes, shops and community facilities. Poplar High Street includes food stores well as other local retail units runs east/west (and is also the route of Cycleway 3). The Isle of Dogs is located to the south of Aspen Way and includes the diverse areas of Canary Wharf (an extension of the Central London Central Business District) and local community focused areas such as Cubitt Town. The A1206 Prestons Road is the main access on the Isle of Dogs and to Cubitt Town. There is a local centre to the south near the Island Gardens DLR station.

Important areas of green space on the Isle of Dogs include Millwall Park and Mudchute Park and Farm.

7.1.2 The southern LSA

The southern LSA is dominated by the Greenwich Peninsula which comprises mainly industrial, commercial and leisure uses. The O2 Arena at the northernmost tip of the Peninsula is a national entertainment venue and tourist attraction. It also provides local shops and services and is accessed by North Greenwich underground station (Jubilee Line), the IFS Cloud Cable Car and from North Greenwich Bus Station. There are large areas of car parking to the south, interspersed with light industrial and commercial uses.

The Greenwich Peninsula Masterplan sets out comprehensive redevelopment of former industrial and commercial land uses, with the Greenwich Millennium Village forming part of this redevelopment. Community facilities include Millennium Primary School and St Mary Magdalene Primary and Secondary Schools. The Greenwich Peninsula Ecology Park and an area of Metropolitan Open Land (MOL) on Millennium Way provide local open space for the residential community.

Residents from new housing developments on the Peninsula use the local facilities at The O2 Arena giving it a district centre role. The A206 (Trafalgar Road/Woolwich Road) passes west-east from Greenwich through New Charlton to Woolwich. Trafalgar Road is fronted by shops, businesses, restaurants and cafes between Greenwich and the A102. It forms a district centre for the local community with nearby residential areas including the community of Westcombe Park.

Residential areas straddle the A206 (Trafalgar Road) with the area to the north including suburban housing along Tunnel Avenue, Glenister Road and Blackwall Lane. The land uses to the north and south of the A206 (Woolwich Road) differ markedly. Land uses to the north principally comprise retail and leisure areas, for example the Millennium Leisure Park, Greenwich Shopping Park to the south of the A206 (Woolwich Road) are principally residential areas including Charlton and, further east, is the district centre of Woolwich.

7.1.3 Community Facilities

Community Facilities in the LSA are comprised of:

- Places of worship
- Medical facilities
- Educational facilities
- Care institutions
- Community Centres

Figure 4 and Figure 5 show schools and other community facilities in the LSA.

Figure 4: Local Schools

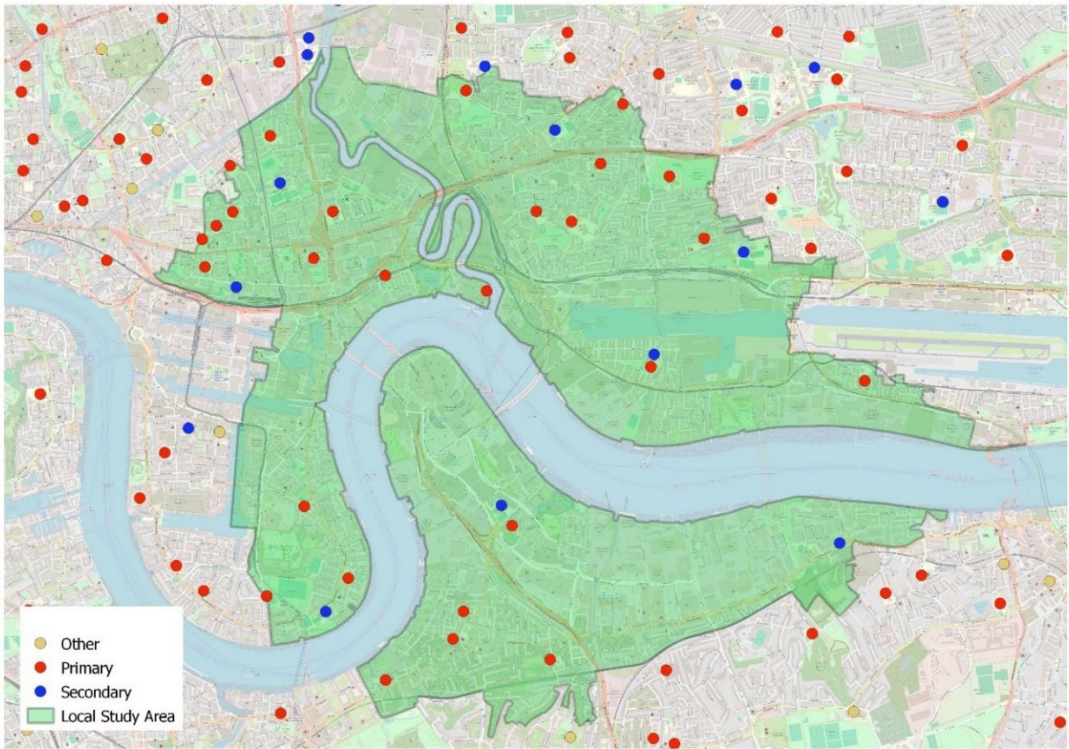
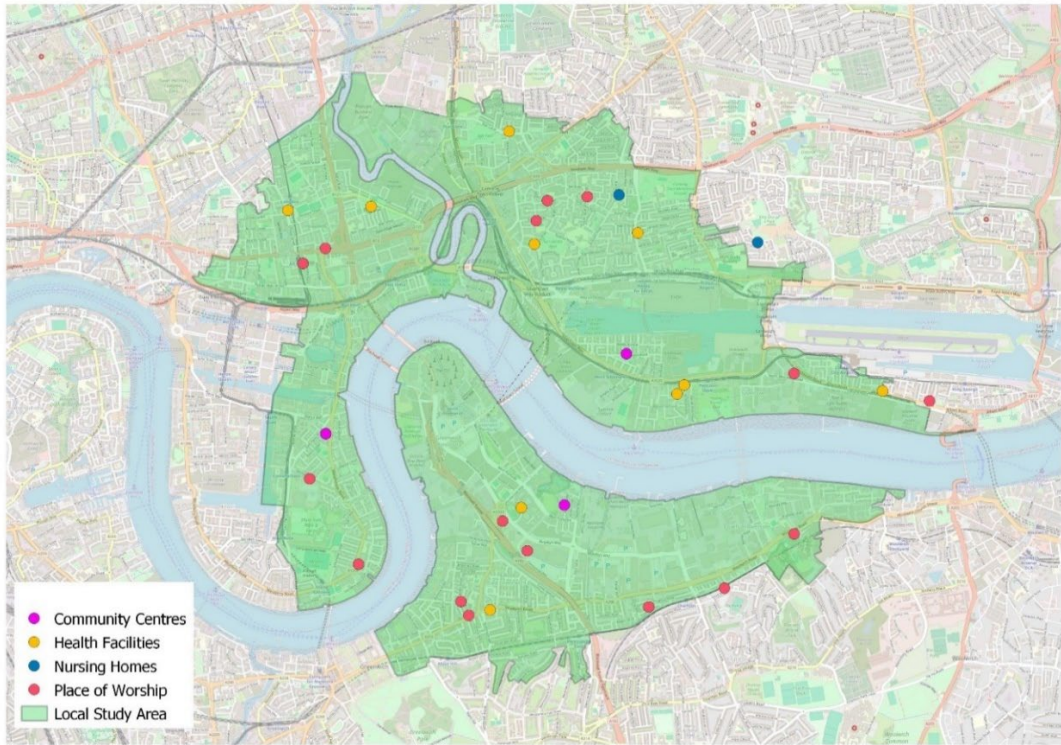


Figure 5: Local Community Facilities



7.2 Population Data

7.2.1 Population Statistics

According to the 2021 Census, the total population of the LSA is 123,800 with 93,470 north of the river and 30,330 south of the river.

The population of the host boroughs is 950,400. Newham is the most populous of the three host boroughs, with a population of 351,000. This is followed by Tower Hamlets and Greenwich, with populations of 310,300 and 289,100 respectively.

The population of the Sub-Region Area is 3,472,400, which is 40 per cent of London's total population.

Table 8: Population Data⁵

Area	Total
Greenwich	289,071
Newham	351,036
Tower Hamlets	310,306
Sub-Region	3,472,396
Local Study Area (North)	93,469
Local Study Area (South)	30,334
London	8,799,725

7.2.2 Car Ownership by borough

Table 9: Car Ownership Data⁶

Area	Total
Greenwich	35%
Newham	24%
Tower Hamlets	19%
Sub-Region	34%
London	36%

⁵ ONS Census (2021)

⁶ London Travel Demand Survey 2022/23

Car ownership levels vary across the host boroughs, Sub-Region and London (Table 9).

Data from the 2022/2023 London Travel Demand Survey⁷ shows that 19 per cent of residents in Tower Hamlets own a personal car. This is lower than the proportion within Newham and Greenwich at 24 per cent and 36 per cent respectively. This is substantially lower than national levels of car ownership.

Average car ownership across the Sub-Region varies, with higher levels of car ownership in outer London boroughs. The average proportion of residents with a personal car in the Sub-Region is 34 per cent. This is slightly lower than the London-wide average of 36 per cent.

Cross-river car travel may also be by hire or car club vehicles and there are several car club vehicles / bays on either side of the Silvertown and Blackwall tunnels. It is not yet known whether operators will pass the proposed user charges onto customers.

7.2.3 Van Ownership by borough

Van ownership varies across the host boroughs and London and is comparatively low (Table 10).

Table 10: Van ownership⁸

Area	Households with 1 or more vans
Greenwich	2.2%
Newham	0.4%
Tower Hamlets	0.9%
Sub-Region	3%
London	2%

7.2.4 Motorcycle ownership by borough

Motorcycle ownership varies across the host boroughs and London and is comparatively low (Table 11).

⁷ London Travel Demand Survey is an annual survey by TfL.

⁸ London Travel Demand Survey 2022/23

Table 11: Motorcycle ownership⁹

Area	Households with 1 or more motorcycles
Greenwich	1%
Newham	3%
Tower Hamlets	4%
Sub-Region	2%
London	3%

7.2.5 Cross-River Travel in East/Southeast London

The Silvertown Tunnel Socio-Economic Monitoring Report¹⁰ (May 2024) highlights some variation in trip purposes as seen in Table 12.

64 per cent of residents from Greenwich and 43 per cent from Newham cross the river at least once a week for any purpose compared to 22 per cent in Tower Hamlets. Cross-river commuting, leisure trips and journeys for shopping or personal business are higher in Greenwich compared to Newham and Tower Hamlets.

Table 12: Travelling for journey purposes across the River Thames in East/ Southeast London at least once a week – by borough of residence¹¹

	Greenwich (n=131)	Newham (n=256)	Tower Hamlets (n=221)
Travel to work (commuting)	49%	32%	12%
Travel for work (business)	18%	15%	4%
Travel to education	5%	8%	2%
Travel for shopping and personal business	24%	10%	6%
Leisure	30%	15%	8%
Other reasons	5%	7%	0%

⁹ London Travel Demand Survey 2022/23

¹⁰ TfL, [Silvertown Tunnel socio-economic monitoring: year 2](#) (May 2024)

¹¹ TfL, Silvertown Tunnel socio-economic monitoring (May 2024); resident surveys; Q2 'How often do you travel across the River Thames in east/southeast London for [purpose]?', 2023 (base sizes as above)

One day a week or more for any purpose	64%	43%	22%
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As shown in Table 13 people are more likely to cross the river regularly for travel for work purposes. However, the proportion who make daily journeys for any purpose is small.

Table 13: Frequency of travelling for different purposes across the River Thames in East/Southeast London among those who make any journey type¹²

	Travel for work (commuting)	Travel for work (business)	Travel for shopping and personal business	Travel to education	Leisure	Other reasons
Every day	13%	2%	0%	4%	0%	0%
3-4 times per week	14%	18%	1%	18%	2%	0%
2 days per week	9%	9%	4%	9%	4%	1%
1 day per week	5%	8%	8%	1%	11%	9%
A few days per month	2%	6%	9%	0%	9%	3%
Less than one day per month	8%	19%	33%	5	41%	26%
Not applicable	48%	37%	43%	62%	31%	38%
Don't know	0%	1%	0%	0%	1%	23%

As part of the public consultation, we asked respondents how often they currently use the Blackwall Tunnel. 46 per cent of respondents use the tunnel at least once a week, 11 per cent use the tunnel every day and six per cent only use the Blackwall Tunnel at the weekend. We also asked respondents which statement best met their future travel

¹² TfL, Silvertown Tunnel socio-economic monitoring (May 2024); resident surveys; Q2 'How often do you travel across the River Thames in east/southeast London for [purpose]?', 2023 (base sizes vary from n= 117 to 964).

intentions when the Silvertown Tunnel opens. 44 per cent of respondents intend to partially switch their journeys from the Blackwall Tunnel to the Silvertown Tunnel and 34 per cent of respondents have no intention of switching their journeys from the Blackwall Tunnel to the Silvertown Tunnel.

7.3 Age

7.3.1 Age Profile

As shown in Table 14, the age distribution across all spatial scales is largely similar. However, the northern LSA has a greater proportion of people aged 25-29.

The proportion of people aged 25-29 is greater in Tower Hamlets compared to Greenwich and Newham as well as, the wider Sub-Region and London.

Table 14: Approximate proportion of residents by age¹³

Age	LSA (North)	LSA (South)	Greenwich	Newham	Tower Hamlets	Sub- Region	London
0 to 4	6%	7%	7%	7%	6%	6%	6%
5 to 9	6%	6%	6%	7%	6%	6%	6%
10 to 14	6%	5%	6%	7%	6%	6%	6%
15 to 19	6%	4%	5%	6%	6%	6%	6%
20 to 24	9%	7%	6%	8%	10%	7%	7%
25 to 29	15%	13%	9%	10%	14%	9%	9%
30 to 34	14%	15%	10%	10%	13%	10%	9%
35 to 39	10%	12%	9%	9%	10%	9%	8%
40 to 44	7%	8%	8%	8%	7%	8%	8%
45 to 49	5%	6%	7%	6%	6%	7%	7%
50 to 54	5%	5%	7%	6%	4%	6%	7%
55 to 59	4%	4%	6%	5%	3%	6%	6%
60 to 64	3%	3%	4%	4%	3%	4%	5%
65 to 69	2%	2%	3%	3%	2%	3%	3%
70 to 74	1%	2%	3%	2%	1%	3%	3%

¹³ ONS Census (2021), TS007A - Age by five-year age bands

75 to 79	1%	1%	2%	1%	1%	2%	2%
80 to 84	1%	1%	1%	1%	1%	1%	2%
85 +	1%	1%	1%	1%	1%	1%	2%

7.3.2 Travel Mode by Age

As shown in Table 15, young people aged between 0-15 are more likely to be car passengers than any other age group.

The most common mode of travel for people aged 16-24 after walking is the bus, with 72 per cent using this mode at least once per week – higher than for any other age group. Only 14 per cent of people in this age group drive at least once per week¹⁴, which is significantly lower than the preceding age groups.

People aged 24-44 are more likely to travel by rail (Underground, Overground, National Rail).

Mode share is similar between people aged 45-59 and 60-64. However, people aged 60-64 are more likely to use the bus, and less likely to cycle.

People aged 65 and over travel by all modes less frequently than other people aged 16 and above. Although walking is the most common mode of travel of this age group, at 84 per cent, this is around 10 per cent lower than the other age groups.

Table 15: Proportion of Londoners using modes of travel at least once per week, by age¹⁵

Mode	Age 0-15 years	Age 16-24	Age 25-44	Age 45-59	Age 60-64	Age 65+
Bus	56%	72%	55%	48%	59%	52%
Walking	97%	96%	97%	94%	95%	84%
Car (Driver)	0%	14%	40%	54%	54%	43%
Car (Passenger)	67%	42%	33%	33%	34%	34%
London Underground	16%	50%	53%	37%	34%	22%
National Rail	6%	18%	19%	15%	13%	9%
London Overground	6%	17%	18%	12%	10%	6%

¹⁴ 16 year olds on higher rate of Disability Living Allowance are legally allowed to drive.

¹⁵ LTDS 2022/23

DLR	3%	7%	6%	5%	4%	2%
Tram	2%	3%	2%	1%	1%	1%
PHV	5%	17%	14%	9%	5%	5%
Taxi	1%	1%	2%	3%	2%	1%
Motorcycle	0%	1%	1%	2%	1%	0%
Pedal Cycle	13%	9%	15%	14%	9%	4%

According to previous TfL research¹⁶, 16-24 year olds are more likely to feel worried about their personal security (i.e. being safe from, crime or antisocial behaviour) when travelling by public transport.

16-24 year olds are also more likely than other age groups to have experienced unwanted sexual behaviour while using public transport. 18 per cent said they had personally experienced unwanted sexual behaviour compared with 10 per cent of all Londoners.

7.3.3 Cross-River Travel in East/Southeast London

According to the Silvertown Tunnel Socio-Economic Monitoring Report (May 2024), cross-river trips for any purpose decreases with age (41 per cent among under 35s compared to 22 per cent of those aged 65+).

Overall, people aged between 35-64 were most likely to cross the Thames by car (as a driver or passenger). Public transport had larger shares across all age groups, in particular among younger people (under 35s) and 55-64s.

Table 16: Travelling for journey purposes across the River Thames in East/ Southeast London at least once a week, by age group¹⁷

	16-34 (n=426)	35-44 (n=221)	45-54 (n=160)	55-64 (n=129)	65+ (n=91)
Travel to work (commuting)	30%	34%	28%	22%	3%
Travel for work (business)	10%	10%	14%	9%	0%
Travel to education	8%	2%	0%	1%	0%

¹⁶ TfL (2019), [Travel in London: Understanding our diverse communities](#)

¹⁷ TfL, Silvertown Tunnel socio-economic monitoring (May 2024); resident surveys; Q2 'How often do you travel across the River Thames in east/southeast London for [purpose]?', 2023 (base sizes as above)

Travel for shopping and personal business	12%	10%	14%	16%	14%
Leisure	17%	17%	13%	12%	18%
Other reasons	3%	4%	3%	3%	3%
One day a week or more for any purpose	41%	40%	36%	35%	22%

The analysis of the responses to the public consultation found that people aged 25 years and under were more likely to use the London Underground, London Overground or Rail (73 per cent) compared to people aged over 25 years (49 per cent), and respondents aged between 26 and 55 were more likely to use the Blackwall Tunnel at least weekly (56 per cent) than those aged 56 and over (39 per cent).

When the Silvertown Tunnel opens, respondents aged 25 and under were more likely to say that they do not intend to use either tunnel (29 per cent) than those in older age groups (16 per cent), and respondents aged under 35 were more likely to say that they intend to use new public transport options (28 per cent) compared to those aged between 46 and over (19 per cent).

Respondents aged 26 and above were more likely to have an Auto Pay account (32 per cent) than those aged 25 and below (14 per cent), which may correlate with the lower current and intended use of the tunnels by individuals in this age range.

7.4 Sex

7.4.1 Sex Profile

The gender split between men and women is similar within the host boroughs, Sub-Region, and London (see Table 17).

Table 17: Sex Profile¹⁸

Area	Women	Men
Greenwich	51%	49%
Newham	50%	50%
Tower Hamlets	50%	50%
Sub-Region	51%	49%
Local Study Area (North)	50%	50%

¹⁸ ONS Census (2021), TS008 - Sex

Local Study Area (South)	51%	49%
London	51%	49%

7.4.2 Travel Mode by Sex

As shown in Table 18, women in London are more likely than men to travel by bus. However, men are more likely to travel by car as a driver, while women are more likely to be a passenger.

Women are also much less likely to cycle, with only eight per cent reporting using this mode at least once per week compared to 17 per cent of men.

Table 18: Proportion of Londoners using modes of travel at least once per week, by sex¹⁹.

Mode	Men	Women
Bus	53%	58%
Walking	95%	94%
Car (Driver)	40%	30%
Car (Passenger)	33%	45%
London Underground	42%	37%
National Rail	16%	14%
London Overground	14%	12%
DLR	5%	5%
Tram	2%	2%
PHV	10%	11%
Taxi	2%	2%
Motorcycle	2%	0%
Pedal Cycle	17%	8%

According to previous TfL research²⁰, women are more likely than men to be travelling with buggies and/or shopping, and to be travelling with children. For this reason, the car is often

¹⁹ LTDS 2022/23

²⁰ [TfL \(2019\), Travel in London: Understanding our diverse communities](#)

seen as convenient. However, the cost and stress associated with driving means that some women prefer to use public transport.

Women are more likely to be worried about personal security (i.e. being safe from crime or antisocial behaviour) while using public transport in London, and are also more likely to have experienced unwanted sexual behaviour while using public transport. However, the mean number of incidents experienced in the past three months is the same among women and men (both 2.7 incidents on average).

7.4.3 Cross-River Travel in East/Southeast London

According to the Silvertown Socio-Economic Monitoring Report (May 2024), men were more likely than women to cross the river for all purposes except shopping/personal business, although the difference was small for this purpose. For commuting and business travel, the share of men crossing was significantly higher compared to women.

In general, men were more likely than women to use the car, in particular as a driver, to cross the river for all purposes on one or more days a week, while women were much more likely than men to be a passenger. They were also much more likely than men to travel by public transport, in particular using National Rail services (21 per cent compared to 12 per cent of men).

Table 19: Travelling for journey purposes across the River Thames in East/ Southeast London at least once a week – by sex²¹

	All (n=1027)	Men (n=531)	Women (n=496)
Travel to work (commuting)	27%	32%	21%
Travel for work (business)	10%	13%	6%
Travel to education	4%	4%	3%
Travel for shopping and personal business	13%	12%	13%
Leisure	16%	17%	14%
Other reasons	3%	4%	3%
One day a week or more for any purpose	38%	43%	32%

²¹ TfL, Silvertown Tunnel socio-economic monitoring (May 2024); resident surveys; Q2 'How often do you travel across the River Thames in east/southeast London for [purpose]?', 2023 (base sizes as above)

7.5 Fertility Rates

General Fertility Rate (GFR) is the number of live births per 1,000 women of child-bearing age ('child-bearing age' is taken as ages 15-44 inclusive for the purposes of calculating the rate).

As shown in Table 20, the GFR in Tower Hamlets, at 45.8, is lower than the London-wide GFR of 52.7. The GFR in Greenwich and Newham is higher than the London-wide average, at 55.8 and 58.9 respectively. The Sub-region average is closer to the London-wide average, at 53.3.

Table 20: General Fertility Rates ²²

Area	General Fertility Rate
Greenwich	55.8
Newham	58.9
Tower Hamlets	45.8
Sub-Region	53.3
London	52.7

7.6 Religion or Belief

7.6.1 Religion or Belief Profile

There is a high level of diversity of religion or belief across the LSA, the three host boroughs and the Sub-Region, as demonstrated in Table 21.

In the northern LSA, Christians are the most common religious group with 34 per cent of residents reporting this as their religion at the 2021 Census. This is followed by Muslims at 29 per cent, and 24 per cent reported having no religion or belief.

In the southern LSA, while the prevalence of Christians is similar to the northern LSA at 38 per cent, the proportion of residents reporting as Muslim is significantly lower at eight per cent. A higher proportion of residents in this area have no religion or belief, at 39 per cent.

These differences between religious identities can also be seen across the three host boroughs. 40 per cent of Tower Hamlets residents are Muslim, compared to 35 per cent in Newham and nine per cent in Greenwich.

Conversely, 45 per cent of residents in Greenwich are Christian, compared to 35 per cent in Newham and 22 per cent in Tower Hamlets.

²² ONS (2021), Live births in England and Wales: birth rates down to local authority areas

33 per cent of residents in Greenwich have no religion or belief, compared to 27 per cent in Tower Hamlets and 14 per cent in Newham.

Across the Sub-Region, Christians are the most common religious group, at 40 per cent. 17 per cent of residents are Muslim whilst 29 per cent have no religion. This is similar to the religious identities London-wide, with 41 per cent Christians, 17 per cent Muslims, and 29 per cent reporting no religion.

Table 21: Resident Population by religion or belief²³

Area	No religion	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religion	N/A
Greenwich	33%	45%	2%	4%	0%	9%	1%	1%	6%
Newham	14%	35%	1%	6%	0%	35%	2%	1%	7%
Tower Hamlets	27%	22%	1%	2%	0%	40%	0%	1%	7%
Sub-Region	29%	40%	1%	3%	1%	17%	1%	1%	7%
Local Study Area (North)	24%	34%	1%	4%	0%	29%	1%	1%	7%
Local Study Area (South)	39%	38%	1%	4%	0%	8%	1%	1%	7%
London	27%	41%	1%	5%	2%	15%	2%	1%	7%

7.7 Race

7.7.1 Race Profile

The 2021 Census data shows that the northern LSA has a greater level of racial diversity compared to the southern LSA.

In the southern LSA, over half (58 per cent) of the population is White, with 16 per cent Black and 14 per cent Asian. By contrast, 39 per cent are White in the northern LSA, while 35 per cent are Asian and 16 per cent are Black.

²³ ONS Census (2021), TS030 - Religion

In both Newham and Tower Hamlets, the most common race reported by residents is Asian, at 42 per cent of the population in Newham and 44 per cent in Tower Hamlets. This is significantly higher than in Greenwich, where 13 per cent of the population is Asian.

The Asian population in the Sub-Region is 22 per cent, which is similar to the London-wide Asian population of 21 per cent.

In Tower Hamlets, seven per cent of the population is Black. This is lower than Greenwich (21 per cent), Newham (17 per cent), the Sub-Region (16 per cent) and London (14 per cent).

Due to the greater levels of racial diversity in Newham and Tower Hamlets, the White population in these boroughs, at 31 per cent and 39 per cent respectively, is lower than in Greenwich. At 56 per cent, the White population in Greenwich is similar to the Sub-Region (53 per cent) and London (54 per cent).

Less than one per cent of the population are Gypsies or Irish Travellers in the LSA, host boroughs, and Sub-region.

Around one per cent of population in the area of the northern LSA is Roma, which is similar to the Roma Population in Tower Hamlets. In all other areas, less than one per cent of the population is Roma.

Table 22: Resident Population by Race²⁴

Area	Asian	Black	Mixed	White	Other
Greenwich	13%	21%	56%	6%	4%
Newham	42%	17%	31%	5%	5%
Tower Hamlets	44%	7%	39%	5%	4%
Sub-Region	22%	16%	53%	5%	5%
Local Study Area (North)	35%	16%	39%	6%	4%
Local Study Area (South)	15%	16%	58%	7%	4%
London	21%	14%	54%	6%	6%

7.7.2 Travel Mode by Race

Table 23 highlights that Black Londoners are less likely to drive than other Londoners, but more likely to use the bus, DLR and PHVs.

Asian Londoners are more likely to travel by car as a passenger, and less likely to travel by rail modes (London Underground, Overground, National Rail).

²⁴ ONS Census (2021), TS021 - Ethnic group

Black and Asian Londoners are over 50 per cent less likely to cycle than White Londoners (seven per cent compared to 15 per cent).

Table 23: Proportion of Londoners using modes of travel at least once per week, by race²⁵

Mode	White	Mixed, Other and Arab	Asian	Black
Bus	52%	56%	52%	69%
Walking	95%	93%	94%	94%
Car (Driver)	38%	30%	37%	27%
Car (Passenger)	38%	38%	46%	38%
London Underground	41%	37%	36%	40%
National Rail	17%	13%	11%	14%
London Overground	13%	12%	7%	18%
DLR	3%	6%	7%	8%
Tram	1%	3%	1%	3%
PHV	10%	11%	7%	14%
Taxi	2%	1%	1%	1%
Motorcycle	1%	1%	1%	1%
Bicycle	15%	12%	7%	7%

According to previous research²⁶, Black, Asian and minority ethnic Londoners are more likely than white Londoners be worried about their personal security (i.e. being safe from crime or antisocial behaviour) while using public transport.

Black, Asian and minority ethnic Londoners are also more likely than white Londoners to have experienced hate crime targeted at themselves or witnessed it in the past year (27 per cent compared with 19 per cent). The proportion rises to 32 per cent among mixed ethnicity Londoners.

²⁵ LTDS 2022/23

²⁶ [TfL \(2019\), Travel in London: Understanding our diverse communities](#)

7.7.3 Car Ownership by Race

LTDS Data from 2022/2023 highlights that car ownership levels vary by race within the host boroughs, Sub-Region and London.

In Greenwich, residents reporting as 'mixed, other and Arab' are most likely to own a personal car, at 63 per cent. This is followed by White residents (41 per cent), Asian (29 per cent) and Black (24 per cent).

In Newham, Black residents are most likely to own a car, at 26 per cent. This is marginally higher than for all other racial groups, at 23 per cent.

In Tower Hamlets 24 per cent of Asian residents own a car. This is relatively greater than car ownership levels for White and Mixed, Other and Arab residents, both at 17 per cent. Black residents in Tower Hamlets are least likely to own a car, at 14 per cent.

7.7.4 Cross-River Travel in East/Southeast London

According to the Silvertown Tunnel Socio-Economic Monitoring Report (May 2024), White residents were more likely to cross the river for any trip type once a week or more. Asian residents and people from Mixed/Chinese/Other racial groups were more likely than average to travel across the river for education.

Across all purposes, car use (as a driver or passenger) was higher for Asian and Black residents than others. Consequently, public transport use was relatively low for these groups. Cycling was higher among White residents (six per cent compared to no respondents in the Black or Asian subgroups).

Table 24: Travelling for journey purposes across the River Thames in East/ Southeast London at least once a week – by ethnicity²⁷

	All (n=1027)	Asian (n=239)	Black (n=145)	Mixed/ Chinese/ Other (n=84)	White (n=558)
Travel to work (commuting)	27%	23%	26%	27%	29%
Travel for work (business)	10%	12%	8%	6%	10%
Travel to education	4%	7%	4%	6%	2%
Travel for shopping and personal business	13%	9%	7%	11%	16%

²⁷ TfL, Silvertown Tunnel socio-economic monitoring (May 2024); resident surveys; Q2 'How often do you travel across the River Thames in east/southeast London for [purpose]?', 2023 (base sizes as above)

Leisure	16%	12%	7%	15%	20%
Other reasons	3%	4%	4%	2%	3%
One day a week or more for any purpose	38%	34%	34%	38%	40%

Analysis of the responses to the consultation found that Black, Asian and other Ethnic groups were more likely to use the bus (20 per cent) compared to White respondents (13 per cent), and Black, Asian and Other Ethnic Group respondents were more likely to use the Tunnel 2-3 times a week or more (38 per cent) than White respondents (24 per cent).

When the Silvertown Tunnel opens, Black, Asian and Other Ethnic Group respondents have a greater intention to use the Silvertown Tunnel at least once a week or more (31 per cent) than White respondents (17 per cent).

7.8 Sexual Orientation and Gender Reassignment (LGBT)

We recognise that sexual orientation and gender identity are two separate protected characteristics under the Equality Act 2010, however data sources often merge the two under the 'umbrella' term 'LGBT' (lesbian, gay, bisexual, transgender).

The Equality Act 2010 uses the term 'transsexual' for individuals who have the protected characteristic of gender reassignment. We recognise that some people consider this term outdated, so we have used the term 'trans' to refer to a person who has the protected characteristic of gender reassignment. However, we note that some people who identify as trans may not fall within the legal definition.

A person can be at any stage in the transition process, from proposing to reassign their sex, undergoing a process of reassignment, or having completed it. This can therefore make it difficult to accurately quantify the number of people who are protected under the Equality Act due to their gender reassignment at a local level. Census data on the proportion of people identifying as trans is therefore a useful proxy for this data.

The 2021 Census data shows that four per cent of residents aged 16 and over in Tower Hamlets are Gay or Lesbian and three per cent are Bisexual. This is marginally higher than in Greenwich and Newham, and the Sub-Region and London levels.

Table 25: Sexual Orientation of Population²⁸

Area	Straight or Heterosexual	Gay or Lesbian	Bisexual	All other sexual orientations	Not answered
Greenwich	87%	2%	1%	<1%	9%

²⁸ ONS Census (2021), TS077 - Sexual orientation

Newham	85%	2%	2%	<1%	11%
Tower Hamlets	83%	4%	3%	<1%	10%
Sub-Region	86%	2%	2%	<1%	9%
London	86%	2%	2%	<1%	10%

The Census data in Table 26 shows that less than one per cent of the population identify as trans in the host boroughs, sub-region and London.

Table 26: Resident Population by Gender Identity and Trans Status²⁹

Area	Gender identity the same as sex registered at birth	Gender identity different from sex registered at birth but no specific identity given	Trans woman	Trans man	All other gender identities	Not answered
Greenwich	92.0%	0.4%	0.2%	0.2%	0.1%	7.2%
Newham	88.5%	0.9%	0.2%	0.3%	0.1%	10.0%
Tower Hamlets	90.7%	0.6%	0.1%	0.1%	0.2%	8.3%
Sub-Region	91.7%	0.4%	0.2%	0.2%	0.1%	7.4%
London	91.2%	0.5%	0.2%	0.2%	0.1%	7.9%

According to previous research³⁰, LGBT Londoners are more likely to have been subjected to sexual comments or sexual gestures when using public transport compared to heterosexual and/or cisgender Londoners and are more likely to have experienced or witnessed hate crime.

Fear of intimidation and/or abuse are potential barriers to public transport use, and modifications to travel behaviour as a result of such fears are thought to depend on many factors, including people's personalities, previous experiences and the degree to which they perceive themselves as visibly LGBT.

²⁹ ONS Census (2021), TS078 - Gender identity

³⁰ [TfL \(2019\), Travel in London: Understanding our diverse communities](#)

7.9 Disability

7.9.1 Disability Profile

Under the Equality Act 2010, a disability is classified as a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on the ability of an individual to do normal daily activities. 'Substantial' is more than minor or trivial, for example, it takes much longer than it usually would to complete a daily task like getting dressed. 'Long-term' means 12 months or more, for example a breathing condition that develops as a result of a lung infection.

A progressive condition is one that gets worse over time. People with progressive conditions can be classed as disabled. However, an individual automatically meets the disability definition under the Equality Act 2010 from the day they are diagnosed with HIV infection, cancer or multiple sclerosis.³¹

As shown in Table 27, disability rates are similar in across all of the spatial areas.

Table 27: Resident Population by Disability³²

Area	Disabled under the Equality Act	Not disabled under the Equality Act
Greenwich	14%	86%
Newham	12%	88%
Tower Hamlets	13%	87%
Sub-Region	14%	86%
Local Study Area (North)	12%	88%
Local Study Area (South)	11%	89%
London	13%	87%

7.9.2 Travel Mode by Disability

As shown in Table 28, disabled Londoners are less likely to travel by all modes compared to non-disabled Londoners.

³¹ [GOV, Definition of disability under the Equality Act 2010](#)

³² ONS Census (2021), TS038 - Disability

Similar to non-disabled Londoners, walking and bus are the two most commonly used modes. However, for disabled Londoners car as a passenger is the third most common, which is fourth for non-disabled people.

Disabled people are much less likely to use rail modes (London Underground, Overground, National Rail).

Taxi and PHV use are similar for disabled and non-disabled Londoners. However, 17 per cent of disabled people in the host boroughs and 13 per cent in Sub-region travel by PHV at least once per week. This is greater than the use by non-disabled people in these areas by ten per cent.

Table 28: Proportion of Londoners using modes of travel at least once per week, by disability³³

Mode	Disabled	Non-Disabled
Bus	44%	57%
Walking	73%	96%
Car (Driver)	25%	36%
Car (Passenger)	35%	39%
London Underground	14%	41%
National Rail	7%	16%
London Overground	7%	14%
DLR	4%	5%
Tram	1%	2%
PHV	11%	11%
Taxi	2%	2%
Motorcycle	1%	1%
Pedal Cycle	3%	13%

³³ LTDS 2022/23

According to previous research³⁴, disabled Londoners are more likely than non-disabled Londoners to be worried about personal security (i.e. being safe from crime or antisocial behaviour) while using public transport in London.

Furthermore, disabled Londoners are more likely than non-disabled Londoners to have experienced a specific worrying incident in the past three months (38 per cent compared with 30 per cent).

7.9.3 Cross-River Travel in East/Southeast London

According to the Silvertown Tunnel Socio-Economic Monitoring Report (May 2024), respondents who have a disability were much less likely to travel for all purposes across the Thames.

Table 29: Travelling for journey purposes across the River Thames in East/ Southeast London at least once a week – by disability³⁵

	All (n=1027)	Has a disability (n=107)	Does not have a disability (n=907)
Travel to work (commuting)	27%	5%	30%
Travel for work (business)	10%	3%	11%
Travel to education	4%	0%	4%
Travel for shopping and personal business	13%	11%	13%
Leisure	16%	10%	16%
Other reasons	3%	1%	4%
One day a week or more for any purpose	38%	13%	41%

7.9.4 Dial-a-Ride Users

London Dial-a-Ride is a free, door-to-door transport service provided by TfL for older and disabled Londoners who can't always use public transport.

Dial-a-Ride can be used for local trips, such as going to the shops, visiting family or friends, attending social activities and GP or dentist and some other medical appointments

³⁴ [TfL \(2019\), Travel in London: Understanding our diverse communities](#)

³⁵ TfL, Silvertown Tunnel socio-economic monitoring (May 2024); resident surveys; Q2 'How often do you travel across the River Thames in east/southeast London for [purpose]?', 2023 (base sizes as above)

where no other form of door-to door transport is available. It cannot be used for hospital appointments, local authority day centres and school transport.

To be eligible for Dial-a-Ride services, users must meet any of the following criteria:

- A Taxicard member
- Getting the Higher Rate Mobility Component of Disability Living Allowance
- Getting the Standard or Enhanced Mobility Rate of the Personal Independence Payment (PIP)
- Registered blind or partially sighted
- Aged 85 or over
- Getting a Higher Rate Attendance Allowance
- Getting a War Pension Mobility Supplement.

Table 30 summarises the number of residents in the host boroughs registered for Dial-a-Ride and the number of trips made in the period 28 May 2023 to 24 June 2023.

Table 30: Dial-a-Ride Users and Trips in the Host Boroughs³⁶

Area	Registered members	Trips
Newham	1,540	2,090
Tower Hamlets	595	528
Greenwich	586	368

7.9.5 Blue Badge Holders

Table 31 highlights that the proportion of Blue Badge holders is similar within the host boroughs, sub-region and London-wide.

Table 31: Proportion of Resident Population with Blue Badges³⁷

Area	Number of valid Blue Badges held on 31 March 2023	Badge holders as a percentage of the population
All London	273,000	3%
Sub-Region	107,000	3%
Greenwich	8,000	3%
Newham	9,000	3%
Tower Hamlets	8,000	3%

³⁶ TfL Data

³⁷ Department for Transport (2023), DIS0105 - Valid Blue Badges held and population measures by region and local authority in England

To be eligible for a Blue Badge, holders must:

- Receive the higher rate of the mobility component of the Disability Living Allowance (DLA)
- Receive a Personal Independence Payment (PIP) because they can't walk more than 50 metres (a score of 8 points or more under the 'moving around' activity of the mobility component)
- Be registered blind (severely sight impaired)
- Receive a War Pensioners' Mobility Supplement
- Have received a lump sum benefit within tariff levels 1 to 8 of the Armed Forces and Reserve Forces (Compensation) Scheme and have been certified as having a permanent and substantial disability that causes inability to walk or very considerable difficulty in walking.
- Receive the mobility component of PIP and have obtained 10 points specifically for descriptor E under the 'planning and following journeys' activity, on the grounds that they are unable to undertake any journey because it would cause them overwhelming psychological distress.

7.10 Homelessness

Table 32 sets out the approximate number of people seen rough sleeping in the three host boroughs in 2022/2023.

Table 32: Number of people seen rough sleeping in Host Boroughs in 2022/2023³⁸

Area	Number of people seen rough sleeping in 2022/2023
Greenwich	196
Newham	503
Tower Hamlets	460

Table 33 sets out number of people who threatened with homelessness and owed prevention duties which include any activities aimed at preventing a household threatened with homelessness within 56 days from becoming homeless. This table also shows the number of people who are homeless and owed relief duties and require help to secure settled accommodation.

³⁸[GLA \(2023\) CHAIN Annual Report – Greater London – April 2022 to March 2023](#)

However, it should be noted that this data may not fully represent the homeless population at any given time.

Table 33: Number of people homeless and threatened with homelessness between July to Sept 2023³⁹

Area	Threatened with homelessness – Prevention duty owed	Homeless – duty owed
Greenwich	290	334
Newham	156	503
Tower Hamlets	277	382
London	6,600	8,040

7.11 Asylum Seekers & Refugees

Table 34 sets out the number of Asylum Seekers in the Sub-Region in receipt of support as of 31 March 2023. It should be noted that this does not account for Asylum Seekers who are awaiting approval of their application for support or are yet to be approved accommodation within a local authority through a resettlement programme.

Table 34: Sum of Asylum Seekers in receipt of support, by borough⁴⁰

Area	Number of People
Greenwich	568
Newham	1,550
Tower Hamlets	449
Sub-Region	9,074

Table 35 sets out the number of refugees resettled from Q1 2019 to Q1 2023.

³⁹ Department for Levelling Up, Housing and Communities (2024), Statutory homelessness: Detailed local authority-level tables July-September 2023, Table A1 - Number of households by initial assessment of homelessness circumstances and needs

⁴⁰ Home Office (2023), Immigration System Statistics – Asylum and Resettlement – Asylum Seekers in receipt of support by Local Authority

Table 35: Sum of Refugees Resettled from Q1 2019 to Q1 2023, by borough⁴¹

Area	Number of People
Greenwich	56
Newham	6
Tower Hamlets	9
Sub-Region	300

7.12 Carers

Care workers predominantly fall under two categories: care home workers and domiciliary care workers. The former provide care within a set location, such as a care or nursing home. The latter provide care in the community and typically visit their clients in their own home. A domiciliary care worker would visit multiple clients in their own homes over a typical shift, in order to fulfil their care needs.

Similar to domiciliary care workers, personal assistants (PAs) provide care within a client's own home. However, rather than being employed by a care organisation, a PA would typically be employed by the person they are caring for (or by their guardian) to support the individual to live independently. This may include tasks such as organising activities and appointments, helping with travel, personal care, and household tasks. Some PAs may be employed by a senior PA, who manages multiple PAs.

Some care workers also work on a voluntary basis for charitable organisations, whilst others may undertake care responsibilities on an informal basis by providing care duties for a friend or family member.

Our definition of carers for the purposes of this assessment includes:

- Paid carers (domiciliary and residential)
- Informal carers (unpaid)
- Carers in the voluntary and community sectors (paid and unpaid)
- Personal Assistants (PAs)

Care workers are amongst the lowest paid workers in the UK. Nationally, care worker median pay was £11 (£11.31 in the London region) in December 2023 according to research by Skills for Care⁴². However, in 2024, this is considered to be around roughly £12 an hour⁴³. This reflects changes in the National Living Wage to £11.44 in April 2024.

⁴¹ Home Office (2023) Immigration System Statistics – Asylum and Resettlement – Resettlement by Local Authority

⁴² [Skills for Care \(2023\), A summary of the adult social care sector and workforce in London 2022/23](#)

⁴³ [Nurses.co.uk \(30 July 2024\), What is the NHS minimum wage and which social care workers are paid it?](#)

According to the Government's National Career Service website, the average starter salary for a care worker is £19,000 a year and £25,000 for an experienced care worker⁴⁴. Assuming a 40-hour work week, carers receiving the National Living Wage would be paid around £23,795 annually. This is similar to the entry point (Band 2) salary of a Health Care Assistant in the NHS⁴⁵. However, it is important to acknowledge that many care workers in London are employed on zero-hour contracts. In 2023, around 39 per cent (73,000 filled posts) of the workforce in London were recorded as being employed on zero-hour contracts. Non-residential care services had the highest proportion of workers employed on zero-hour contracts at 62 per cent⁴⁶. Therefore, for these care workers, salaries may be lower.

It is also understood that the care sector faces significant workforce challenges in retaining and recruiting staff. There is also reported to be a very high staff turnover in the sector. This is likely to be due to a combination of factors, with key concerns raised around the low pay and workload pressures experienced by staff in the sector.

A further challenge faced by many working in the domiciliary care sector is that the majority are not paid for time spent travelling between jobs. According to Unison, a survey of more than 300 domiciliary care workers across England in 2023 found that 75 per cent of care staff who look after people at home are not being paid for the time it takes them to travel between appointments.⁴⁷ However, a survey by Homecare Association found that 90 per cent of staff who worked for the organisations which responded use their own vehicle or public transport and expenses are paid – this of course comes at a cost to the organisation, many of whom have expressed concern about the rising costs of covering travel for care workers.⁴⁸

Except for the regulated professions (such as social workers and registered nurses), the social care workforce in England is not subject to professional regulation. This is an area where England differs from the rest of the UK. In Scotland, care workers are required to register with the Scottish Social Services Council and must attain a specific qualification in line with their role within five years if they do not already possess one. In Wales, care workers must commit to complete a required qualification within three years if they do not already possess one. In Northern Ireland, registration is intended to demonstrate compliance with standards of conduct and practice rather than qualifications.⁴⁹

Care Homes and Care Agencies that employ care workers are required to be registered with the Care Quality Commission (CQC). However, this is managed at the organisational level rather than care workers being directly regulated and/or holding a qualification at the individual level.

For charities that provide formal care services and employ care workers, many of these organisations are regulated by the CQC and as such would be included. However, as with NHS nurses, it is likely that nurses working for charities are less likely to be amongst the lowest paid.

⁴⁴ [National Careers Service, Care Worker](#)

⁴⁵ [NHS Pay Scales for 2024/25](#)

⁴⁶ [Skills for Care \(2023\), A summary of the adult social care sector and workforce in London 2022/23](#)

⁴⁷ [Unison \(15 June 2023\), Majority of homecare staff are unpaid for travel between visits](#)

⁴⁸ [Homecare Association \(March 2022\) Fuel costs and homecare – impact on service capacity](#)

⁴⁹ [Adult social care workforce in England, House of Commons Research Briefing](#) (September 2022)

Voluntary care workers and informal carers would not be included as they are not employed by a CQC registered care provider. Not all PAs are required to be registered with the CQC, and this is dependent on a number of factors including whether 'personal care' is involved, whether they are directly employed by an individual, use an introduction agency or matching service to find the PA, employ a pool of PAs working together, whether the individual pools their budget with other individuals to employ a PA, or they engage a self-employed PA.⁵⁰ As a result, it may be harder for a care worker to provide proof of their role, unlike nurses or social workers (who would be able to provide evidence from a regulatory body).

According to Skills for Care, in 2022/23 the adult social care sector in the London region had an estimated 3,500 organisations with 5,800 care-providing locations. The total number of posts was 250,000 (a change of -2,600 from 2021/22). Of these posts, 226,000 were currently filled by a person, called 'filled posts' (0.0 per cent change since 2021/22) and 24,500 were vacant posts (vacancies) that employers were actively seeking to recruit somebody into (a change of -9.8 per cent since 2021/22).⁵¹ Around 79 per cent of care workers in London are female and 65 per cent are from ethnic minority groups.⁵²

A search of a sample of homecare providers inspected by the CQC in the host borough area found that some service providers were providing care in other London boroughs to the ones they were registered in, including clients in cross-river boroughs. The location a domiciliary care worker may travel to is not static and can change regularly. Homecare Association estimates that around 71 per cent of domiciliary care staff in Greater London use either their own vehicle or a company to carry out their duties.⁵³ The distance travelled by a PA is likely to vary dependent on the responsibilities required as part of their employment, which may include travelling with or on behalf of their client, and transporting a client to locations including work, education, social activities or health facilities.

7.13 Employment, Income and Deprivation

7.13.1 Employment Levels

The percentage of economically active people in employment (excluding full time students) is higher in the LSA compared to the Host-Boroughs, Sub-Region and London-wide.

In the southern LSA, economic inactivity is lower than in the area of the northern LSA, host boroughs, Sub-Region and the London-wide average.

In Newham, employment levels at 56 per cent, are marginally lower than in the other host boroughs, and the average across the Sub-Region and London. In Tower Hamlets and Greenwich, the percentage of people in employment is similar to the Sub-Region of 60 per cent.

⁵⁰ [Skills for Care \(2017\), Understanding the employment status of personal assistants \(PAs\) – A guide for individual employers](#)

⁵¹ [Skills for Care \(2023\), A summary of the adult social care sector and workforce in London 2022/23](#)

⁵² [Skills for Care \(2023\), A summary of the adult social care sector and workforce in London 2022/23](#)

⁵³ [Homecare Association \(2022\), High fuel costs – the ongoing impact on homecare](#)

Table 36: Economic Activity of Resident Population⁵⁴

Area	Economically active (excluding full-time students): In employment	Economically active (excluding full-time students): Unemployed	Economically active and a full-time student	Economically inactive
Greenwich	60%	5%	3%	32%
Newham	56%	5%	4%	35%
Tower Hamlets	59%	5%	4%	33%
Sub-Region	59%	4%	3%	33%
Local Study Area (North)	62%	5%	4%	29%
Local Study Area (South)	69%	4%	4%	23%
London	59%	4%	3%	34%

7.13.2 Employment by Occupation

Table 37 shows the percentage of working age population in employment by occupation.

The percentage of residents employed as ‘managers, directors and senior official’ is higher in the southern LSA. In the northern LSA, and within Tower Hamlets, a higher proportion of residents are in ‘professional occupations’.

16 per cent of residents in Newham are employed in ‘elementary occupations’, a greater proportion than in the other areas. A higher proportion of residents are also in lower skilled occupations categories of ‘process, plant and machine operatives’ and ‘sales and customer service occupations’.

⁵⁴ ONS Census (2021), TS066 - Economic activity status

Table 37: Resident Population by Occupation⁵⁵

Area	Local Study Area (North)	Local Study Area (South)	Greenwich	Newham	Tower Hamlets	Sub-Region	London
1. Managers, directors and senior officials	13%	17%	13%	9%	13%	13%	15%
2. Professional occupations	29%	35%	25%	20%	32%	25%	26%
3. Associate professional and technical occupations	16%	18%	15%	12%	18%	15%	15%
4. Administrative and secretarial occupations	7%	7%	8%	8%	7%	9%	8%
5. Skilled trades occupations	6%	4%	8%	10%	5%	8%	8%
6. Caring, leisure and other service occupations	7%	6%	9%	9%	6%	8%	8%
7. Sales and customer service occupations	6%	5%	6%	9%	7%	7%	6%
8. Process, plant and machine operatives	5%	2%	5%	7%	4%	5%	5%
9. Elementary occupations	10%	6%	11%	16%	8%	10%	9%

⁵⁵ ONS Census (2021), TS063 - Occupation

7.13.3 Universal Credit Support Recipients

Table 38 shows the approximate percentage of the population of the Sub-Region boroughs who are in receipt of Universal Credit. Universal Credit is a form of income support provided by Government for people who are on low incomes, out of work or who cannot work.

This data provides an insight into the potential number of people within each borough who may be on low incomes. However, it is not fully representative of the low-income population.

Table 38: Resident Population in Receipt of Universal Credit⁵⁶

Area	Approx. Percentage of population in receipt of Universal Credit
Greenwich	10%
Newham	13%
Tower Hamlets	13%
Sub-region	11%
London	12%

7.13.4 Social Grades

Table 39 shows the percentage of residents in the host boroughs, Sub-Region and London by Social Grade.

Social Grade is a socio-economic classification. This is a way of grouping people by type, which is mainly based on their social and financial situation.

Social Grade has six possible classifications (A, B, C1, C2, D and E). Census data uses a combined, four-way classification:

- AB: Higher and intermediate managerial, administrative and professional occupations
- C1: Supervisory, clerical, and junior managerial, administrative and professional occupations
- C2: Skilled manual occupations
- DE: Semi-skilled and unskilled manual occupations; unemployed and lowest grade occupations

⁵⁶ DWP (2024), People on Universal Credit

Table 39: Resident Population by Approximated Social Grade⁵⁷

Area	AB	C1	C2	DE
Greenwich	26%	30%	19%	24%
Newham	17%	28%	23%	32%
Tower Hamlets	28%	28%	14%	30%
Sub-Region	26%	31%	19%	24%
London	28%	31%	18%	23%

7.13.5 Deprivation

The Income Deprivation Domain measures the proportion of the population in an area experiencing deprivation due to low income. The definition of low income includes both those people that are out-of-work, and those that are in work but who have low earnings (and who satisfy the respective means tests).

As shown in Table 40, of the three host boroughs, Tower Hamlets has the greatest proportion of population in the 10 per cent most income deprived LSOAs nationally. This is the second highest within the sub-region.

In contrast, Tower Hamlets also has the highest proportion of LSOAs in the 10 per cent least income deprived of the three host boroughs.

96 per cent of LSOAs in Newham are in the 50 per cent most income deprived deciles, compared to 87 per cent of LSOAs in Tower Hamlets and 77 per cent in Greenwich.

Table 40: Income Deprivation⁵⁸

Income Decile (where 1 is most deprived 10% of LSOAs)										
Area	1	2	3	4	5	6	7	8	9	10
Greenwich	6%	21%	19%	19%	12%	9%	4%	6%	2%	2%
Newham	4%	19%	38%	23%	12%	1%	0%	1%	1%	2%
Tower Hamlets	15%	36%	16%	10%	9%	4%	2%	4%	2%	2%
Host Boroughs	8%	25%	25%	18%	11%	5%	2%	3%	2%	2%

⁵⁷ ONS Census (2021), Approximated social grade

⁵⁸ Indices of Deprivation (2019), Local income deprivation data

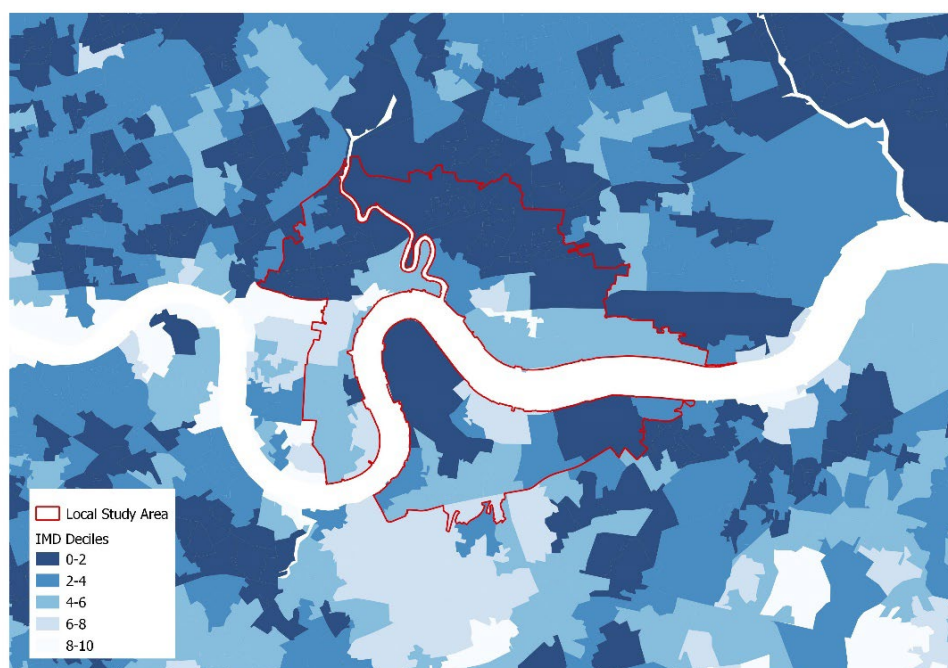
Sub-Region	7%	18%	19%	16%	12%	7%	5%	5%	5%	5%
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When considering the indices of multiple deprivation, 32 per cent of LSOAs in Tower Hamlets are in the 20 per cent most deprived nationally. This is higher than Newham (27 per cent) and Greenwich (22 per cent). As seen in Table 41 some of the LSOAs in the host boroughs are within the most deprived nationally.

Table 41: IMD – Proportion of LSOAs in most deprived 10% nationally⁵⁹

Area	IMD – Proportion of LSOAs in most deprived 10% nationally
Greenwich	1%
Newham	2%
Tower Hamlets	1%
Sub-Region Average	2%

Figure 6: Indices of multiple deprivation



⁵⁹ Indices of Deprivation (2019), Local authority district summaries (lower-tier)

Figure 6 shows the indices of multiple deprivation in the local area, with '1' being the LSOAs within the 10 per cent most deprived and '10' being the 10 per cent least deprived LSOAs in England.

The Scheme is located in an area with high levels of deprivation and racial diversity. Data has shown that people from ethnic minorities are more likely than White British people to live in the most overall deprived 10 per cent of neighbourhoods in England.⁶⁰

7.13.6 Travel Mode by Income

As shown in Table 42 Londoners on lower incomes (below £20,000) are more likely to travel by bus than people on higher incomes, at 67 per cent compared to 55 per cent of people on salaries above £20,000.

Londoners on lower incomes are less likely to drive, with 16 per cent driving at least once per week compared to 36 per cent with higher incomes. People on low incomes are also less likely to travel by active modes (walking and cycling).

Table 42: Proportion of Londoners using modes of travel at least once per week, by income⁶¹

Mode	Less than £20,000	£20,000+
Bus	67%	55%
Walking	90%	95%
Car (Driver)	21%	36%
Car (Passenger)	29%	40%
London Underground	33%	41%
National Rail	10%	15%
London Overground	12%	15%
DLR	7%	5%
Tram	2%	2%
PHV	11%	11%

⁶⁰ [Department for Levelling Up, Housing and Communities \(2020\), People living in deprived neighbourhoods](#)

⁶¹ LTDS 2022/23

Taxi	2%	2%
Motorcycle	0%	1%
Pedal Cycle	7%	13%

7.13.7 Cross-River Travel in East/Southeast London

According to the Silvertown Tunnel Socio-Economic Monitoring Report (May 2024), ABC1⁶² respondents were significantly more likely than residents from lower social grades to cross the river at least once a week for any purpose (48 per cent vs 23 per cent C2DE⁶³). Across all purposes except travel for education or 'other' trips, ABC1 respondents were more likely to make cross-river trips than C2DEs.

Overall, car usage (as a driver or passenger) was much higher among C2DE respondents, while public transport use was higher for ABC1 respondents.

For commuting, Underground/ DLR and car (as a driver) were the most popular modes among both ABC1 (38 per cent and 28 per cent and C2DE residents (52 per cent and 38 per cent) but only ABC1 commuters were likely to use National Rail or Bus services (18 per cent and 10 per cent respectively vs. two per cent for each among C2DE commuters).

Cycling had a larger share of ABC1s whereas walking was more popular among C2DEs.

Table 43: Travelling for journey purposes across the River Thames in East/ Southeast London at least once a week – by social grade⁶⁴

	All (n=1027)	ABC1 (n=603)	C2DE (n=423)
Travel to work (commuting)	27%	39%	10%
Travel for work (business)	10%	13%	6%
Travel to education	4%	2%	7%
Travel for shopping and personal business	13%	13%	12%
Leisure	16%	18%	13%
Other reasons	3%	3%	4%

⁶² ABC1: Crafts/tradesperson/skilled worker, Office/clerical/administration, Middle management, Senior management, Professional

⁶³ C2DE: Homemaker/housewife/househusband, Student/Full time education, Retired, Unemployed/on benefit, Factory/manual worker

⁶⁴ TfL, Silvertown Tunnel socio-economic monitoring (May 2024); resident surveys; Q2 'How often do you travel across the River Thames in east/southeast London for [purpose]?', 2023

One day a week or more for any purpose	38%	48%	23%
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7.13.8 Car Ownership by Low-Income Residents

LTDS data, as shown in

Table 44, highlights that car ownership for lower income residents is lower when compared to the average for all income groups.

Car ownership is lowest in Newham and Tower Hamlets for lower income residents, at 12 per cent and 14 per cent respectively. In contrast, around 24 per cent of residents in Newham irrespective of income own a car, and 19 per cent of Tower Hamlets residents.

Car ownership in lower income households is greater in Greenwich, at 28 per cent. This is higher than the average across the Sub-region and London-wide for lower income residents of 25 per cent and 27 per cent respectively.

Table 44: Proportion of Resident Population who have access to a personal car, by income⁶⁵

Area	Income Below £25,000	All Incomes
Newham	12%	24%
Tower Hamlets	14%	19%
Greenwich	28%	36%
Sub-Region	25%	34%
London	27%	36%

⁶⁵ LTDS 2022/23

8 Equality Impact Assessment

The following section assesses the potential equality impacts of the proposed user charges on protected characteristic and disadvantaged groups in London. This assessment has looked at the potential impacts in relation to the following topics:

- Accessibility (including access to community facilities)
- Access to work and training
- Active Travel
- Noise
- Air Quality
- Road Safety
- Social Capital

Table 1 provides a summary of the impacts topics which have been assessed with regards to their potential impact on protected characteristic and disadvantaged groups and summarises the disproportionate or differential impacts identified. The assessment draws on the data set out in the baseline in Section 7 of this document.

8.1 Accessibility (Including Access to Community Facilities)

8.1.1 Introduction

Accessibility is a key influence on how people live, affecting how they socialise, spend recreation time, access services and work; this has a direct link to health and wellbeing.

The Silvertown Tunnel provides a new link across the Thames improving connectivity north and south of the River Thames in east London and giving access to a significantly wider catchment of services and facilities including education, retail, leisure, healthcare, places of worship and open space. The location of the northern portal of Silvertown Tunnel also provides direct access to the Royal Docks for people travelling from south of the river.

The Scheme will result in improved reliability and reduced journey times of existing bus routes as well as the provision of additional cross-river routes. The availability, efficiency and affordability of transport modes is important, and the proposed user charges have the potential to influence this.

The Scheme, which includes proposed user charges, is forecast to result in a large reduction in delay and congestion on the tunnel approaches making vehicle journey times through the tunnel quicker and more reliable in both directions at peak times. Model forecasts indicate that northbound vehicle journey time through the Blackwall Tunnel is forecast to reduce by around 15 minutes in the morning peak and nine minutes in the evening peak in the opening year (2025). Southbound vehicle journey time in the evening peak is forecast to reduce by up to 14 minutes (journey time benefits in the morning peak southbound are less significant due to lower levels of traffic in that direction, at that time). However, the savings will often be greater (up to 20 minutes, and sometimes more) when considering the knock-on effects of frequent closures and incidents at the Blackwall Tunnel which the scheme will significantly reduce – something that is not reflected in the transport models. This large reduction in delay and congestion would make vehicle journey times

through the tunnel more reliable in both directions at peak times. The new tunnel will also reduce the impact of incidents and closures at the Blackwall Tunnel by providing an additional vehicle route across the Thames.

Furthermore, the Scheme will also provide two new cross-river bus routes (129 & SL4) through the Silvertown Tunnel and provide improved reliability and quicker journey times for the existing route 108 via the Blackwall Tunnel. In the opening year, these improvements are forecast to save 9,800 vehicle-hours per day and 2,800 public transport passenger-hours per day (07:00-19:00).

The user charges are an essential component of the Scheme to remove queueing and congestion at the crossings, enabling reliable bus journeys and thereby opening up access to a wider range of facilities across the river.

8.1.2 Summary

Table 45 summarises the overall equality impact of the proposed user charges on Accessibility. Sections 8.1.3–8.1.11 provide further detail on the factors which have been considered as part of this assessment and the conclusions reached.

Table 45: Accessibility Summary

Summary	<p>The 100 per cent discount for Blue Badge Holders and exemption for disabled tax class vehicles helps to ensure that accessibility is not impacted for eligible disabled people who may be reliant on car use for cross-river travel. These could also potentially benefit some older people.</p> <p>Similarly, the exemptions for taxis and ZEC and/or wheelchair accessible PHVs help to advance equality of opportunity by ensuring that these vehicles are available to disabled people and the proposed user charges will not negatively impact fares. Thus, helping to eliminate unlawful discrimination, advance equality of opportunity, and foster good relations by enabling disabled people who may be reliant on car, taxis, wheelchair accessible PHVs to benefit from improved accessibility.</p> <p>The 100 per cent discount for community transport (Vehicles with 9+ seats) mitigates potential impacts of reduced or cut services provided by community or charitable organisations due to the proposed user charges. This could have a greater positive impact on young children, older people, disabled people, religious groups, homeless people, asylum seekers, refugees, and people on low incomes reliant on this form of transport. Furthermore, the scheme will lead to improved access to a greater range of community facilities due to faster and more reliable journey times. This discount helps to eliminate unlawful discrimination, advance equality of opportunity, and foster good relations.</p> <p>The NHS Patient reimbursement helps to ensure that access to health facilities is not negatively impacted for those unable to travel by public</p>
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transport (subject to eligibility). This could benefit older people, disabled people and pregnant and maternal people to a greater extent than other groups. This helps to eliminate unlawful discrimination and advance equality of opportunity to access healthcare.

The east London low-income residents' discount will help mitigate potential negative impacts on accessibility for people on low incomes who may need to travel by private vehicle. This discount may also benefit people who fall into other protected characteristic and disadvantaged groups who are more likely to be on low incomes, such as older people, Black, Asian and minority ethnic people, and disabled people. Thus, helping to eliminate unlawful discrimination, advance equality of opportunity and foster good relations by ensuring people on low incomes are able to benefit from improved accessibility by private vehicle.

Negative impacts associated with the proposed user charges on accessibility for those not eligible for discounts and exemptions are considered to be offset by faster and more reliable journey times leading to improved accessibility and access to a greater range of community facilities. Furthermore, the provision of new and improved cross-river bus services, with improved journey times and service reliability is considered to provide a viable alternative mode of travel cross-river. As part of the green and fair package of concessions and discounts there will be bus concessions to provide free pay as you go trips to support local residents to use the new cross-river bus services which will run through the tunnel (Route 108, 129 and SL4) and DLR concessions to provide free pay as you go trips (refunded) to support local residents making journeys from King George V - Woolwich Arsenal and Island Gardens - Cutty Sark. The improvements to cross-river accessibility by public transport and other vehicles are considered to help advance equality of opportunity and foster good relations by improving accessibility (including to access to community facilities) cross-river.

There is a risk that the user charge could have a negative impact on carers and the provision of care cross-river by informal, voluntary and paid care workers and PAs. If negative impacts were to arise, this could lead to negative impacts on accessibility for disabled people and older people. Whilst we believe that our proposed support options help to mitigate these potential impacts from occurring, it is important that we monitor whether any negative impacts arise and explore options to mitigate these in line with Policy 15 of the CPAP, and that we provide targeted communications to raise awareness of the discounts and exemptions that care providers or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan.

Overall rating of impact	Neutral
Overall Impacts identified for protected characteristic and disadvantaged groups	N/A
Mitigations required	N/A

8.1.3 Age

8.1.3.1 Young People

As shown in the baseline (Section 7.3.2), young people under the age of 16 in London are more likely to be a car passenger at least once per week than any other age group, at 67 per cent, and around 56 per cent use the bus at least once per week.

Young people aged 16-24 use the bus significantly more than any other age group, with 72 per cent travelling by this mode at least once per week.

Young people reliant on car passenger trips cross-river who live in low-income households eligible for the east London low-income residents' discount will benefit from the discount. This could mitigate negative changes in accessibility resultant from the financial impact of the proposed user charges.

The proposed user charges may present a financial barrier for some young people in households that do not meet eligibility for this discount, which may lead to changes in cross-river travel.

However, the improvements to cross-river public transport provision through the introduction of new bus services through the Silvertown Tunnel and improvements to existing journey times will help to mitigate potential negative impacts on making cross-river journeys for young people, with a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

Young people are also eligible for a number of concessions on public transport use. Including the Zip Oyster card (for people aged 11-17) allowing free travel on buses and discounts on other public transport services. Furthermore, children aged 5-10 with a 5-10 Zip Oyster card travel for free on all TfL services, and children younger than five years of age travel for free with a fare paying adult.

Additionally, for those not eligible for the aforementioned concessions, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people

switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys, and free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V.

The community transport (Vehicles with 9+ seats) 100 per cent discount ensures that school age children reliant on community and charitable transport to access cross-river social, educational, and recreational facilities are not negatively impacted due to reduced or cut services resultant of the proposed user charges.

This discount, in addition to improved journey times and reliability could have a positive impact on accessibility for young people reliant on these services. This would be particularly beneficial to young people with Education Health and Care Plans (EHCPs), with around 40 per cent using this type of travel.⁶⁶

The proposed user charges for PHVs which are not ZEC or wheelchair accessible could lead a small reduction in the availability of PHVs for cross river trips. This could have a small impact on access to Special Educational Needs and Disability (SEND) schools for young people with an EHCP who may use a PHV to travel to school.

However, the impact on availability is predicted to be limited, as only a small number of PHVs meet the standards for SEND transport, with taxis (which are exempt) being the more commonly used mode behind minibuses.⁶⁷

8.1.3.2 Older People

People aged 65 and over travel by all modes less frequently than other people aged 16 and above. Around 43 per cent travel by car as a driver at least once per week (34 per cent as a passenger), and around 52 per cent travel by bus at least once per week.

As shown in the baseline (Section 7.3.3), 22 per cent of people aged 65 and over cross the Thames in east and southeast London at least once per week, with 'leisure' and 'shopping and personal business' being the primary reasons for crossing the river.

The community transport (Vehicles with 9+ seats) 100 per cent discount helps to ensure that older people who may be reliant on community and charitable transport which may require cross-river travel are not negatively impacted due to user charges. This discount, alongside the improved journey times and reliability is likely to have a positive impact on people older people reliant on services such as Dial-a-Ride.

Older people who are eligible for a Blue Badge will benefit from the 100 per cent discount for Blue Badge Holders. This discount will help ensure that older people who may need to travel by car do not experience reduced accessibility resulting from the financial implications of the proposed user charges. The improvements in journey times and reliability could have a positive impact on accessibility for older people who are Blue Badge holders.

Older people with a disabled tax class vehicle will benefit from the exemption for vehicles with a disabled tax class. This will help ensure that older people who may need to travel by car do not experience reduced accessibility resultant of the financial implications of the

⁶⁶ [London Councils \(March 2020\), SEN Transport in London: Current and emerging practice](#)

⁶⁷ [London Councils \(March 2020\), SEN Transport in London: Current and emerging practice](#)

proposed user charges. This exemption, alongside the improvements in journey times and reliability could have a positive impact on accessibility.

Some older people may be reliant on a domiciliary, voluntary, or informal care worker or PA to help them with cross-river travel by private vehicle. As set out further in Section 8.2.6, there is a risk that the proposed user charges could lead to a negative impact on the provision of care cross-river. If this were to occur, it could lead to negative impacts on accessibility for older people in receipt of care.

When travelling with a person in receipt of care who has a Blue Badge, care workers can potentially apply their vehicle to the Blue Badge holder's Road User Charging account prior to travel in order to receive a 100 per cent discount on the user charges. A maximum of two vehicles can be registered to an account. If the carer or PA is the nominated driver for a person eligible for a vehicle to be registered in the Disabled Tax Class, they are able to receive an exemption. Furthermore, if transporting an older person to an eligible NHS appointment, they may be able to claim a reimbursement of the user charges.

Some carers and PAs may be eligible for a 50 per cent discount on the user charges through the east London low-income residents' discount. Furthermore, we are providing a £1 discount on the off-peak user charges for eligible sole traders, charities, and small businesses registered in the host boroughs and free pay as you go (refunded) bus and certain pay as you go DLR river crossings for at least one year following tunnel opening, a 100 per cent discount for community transport (Vehicles with 9+ seats) and a 100 per cent discount for certain operational vehicles of the host boroughs.

The improvements in journey times and reliability may also mean that cross-river travel via the tunnels becomes a more viable option for carers, helping to improve in accessibility for older people reliant on them for cross-river travel. As such, whilst we believe that our proposed discounts and exemptions alongside the improvements to journey times and reliability will help to mitigate negative impacts on the provision of care whilst ensuring we achieve our project objectives, it is important that we monitor how the scheme is affecting cross-river care provision and ensure we seek to address any impacts should they have a negative impact on protected characteristic and disadvantaged groups. In line with Policy 15 of the CPAP, we will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening.

Additionally, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended that we provide targeted communications to carers to raise awareness of the discounts and exemptions they or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan.

Some older people who are not eligible for the aforementioned discounts and exemptions may be impacted by the proposed user charges. This may lead to changes in frequency and mode of travel, and impact accessibility. However, older people in low-income households may be eligible for the east London low-income residents' discount, helping to offset the financial impact. Furthermore, they will benefit from improvements to journey times and reliability when using the tunnels.

Older people in London are eligible for travel concessions, including the 60+ Oyster Card and Freedom Pass. As shown in the baseline (Section 7.3.2), the bus is the most used

mode of transport for older people in London. Therefore, the improvements to bus service provision through the tunnels through new and improved routes will help to provide a suitable alternative mode of travel for older people who switch modes due to the proposed user charges. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4. All TfL buses are wheelchair accessible, and travel by wheelchair or mobility scooter is free on buses.

Additionally, for those not eligible for the aforementioned concessions, as part of the green and fair package of concessions and discounts, concessions will be offered on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys, and free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V as well as a cross-river cycle shuttle-bus, free for at least 12 months. All TfL buses are wheelchair accessible and all DLR stations are step-free.

A Road User Charging account is required to sign up to Auto Pay or to receive certain discounts such as the low-income resident's discount and 100 per cent discount for Blue Badge holders. It is recognised that older people are significantly more likely than other age groups to be at risk of digital exclusion due to a lack of access to the internet, with 73 per cent using the internet at home compared to 96 to 99 per cent of other people aged 16 and over.⁶⁸

Due to this, some older people may face barriers to accessing discounts and exemptions they may be eligible for and may not be able to benefit from off-peak charges. To overcome this, in our road user charging systems we comply with reasonable adjustment provisions to ensure that we offer a suitable level of service to all customers, these provisions we have for reasonable adjustments can also cater for people that are not online. Customers are able to contact our call centre to carry out functions such as setting up a discount and setting up Auto Pay and are able to send in supporting evidence via post. Customers can also pay the tunnel charges via the automated telephony system without having to go online or download the app. This helps to ensure that people who may be digitally excluded, such as older people, are not negatively impacted by a lack of access to the system.

8.1.4 Disability

As shown in the baseline (Section 7.9.2), disabled Londoners are less likely to travel by all modes compared to non-disabled Londoners. However, behind walking, bus and car journeys (as a passenger) are the most common modes – at 44 per cent and 35 per cent respectively. Furthermore, disabled Londoners are less likely to cross the Thames for any purpose than non-disabled Londoners.

The baseline data in Section 6.9.2 also shows that around one quarter of disabled Londoners travel by car as a driver at least once per week. Some disabled Londoners may travel by this mode due to barriers or challenges using public transport (including safety and harassment concerns). Disabled people who prefer or need to drive may be negatively impacted by the proposed user charges. However, they will benefit from the improvements to journey times and journey reliability from the Scheme. To mitigate negative impacts on

⁶⁸ [Ofcom \(2022\), Digital Exclusion Review](#)

accessibility for disabled people resultant of the user charges, we have proposed several discounts, exemptions, reimbursements and travel concessions.

Disabled people who are Blue Badge Holders will benefit from a 100 per cent discount for Blue Badge Holders. Furthermore, disabled people with a disabled tax class vehicle will benefit from the exemption for vehicles with a disabled tax class. These discounts and exemptions help to ensure that disabled people who may need to travel by car do not experience reduced accessibility resultant of the financial implications of the proposed user charges.

Some disabled people will also be eligible for the east London low-income residents' discount, helping to mitigate the impact of the proposed user charges on disabled people. Previous research has shown that around 61 per cent of disabled Londoners are on low incomes.⁶⁹

A Road User Charging account is required to sign up to Auto Pay or to receive certain discounts such as the 50 per cent discount for low-income resident's discount in east London, and 100 per cent discount for Blue Badge holders. It is recognised that some disabled people may not be able to fully access our online systems.

Due to this, some may face barriers to accessing discounts and exemptions that they may be eligible for and may not be able to benefit from off-peak charges. To overcome this, in our road user charging systems we comply with reasonable adjustment provisions to ensure that we offer a suitable level of service to all customers, these provisions we have for reasonable adjustments can also cater for people that are not online. Customers can contact our call centre to carry out functions such as setting up a discount and setting up Auto Pay and are able to send in supporting evidence via post. Customers can also pay the tunnel charges via the automated telephony system without having to go online or download the app. This helps to ensure that people who may be digitally excluded, such as disabled people, are not negatively impacted by a lack of access to the system.

For those who choose to switch modes due to the financial cost of the proposed user charges, we offer a free Travel Mentoring Scheme to help people using public transport in and around London to become confident and independent travellers. Travel mentors can give advice by telephone and email to help plan an accessible route, provide a mentor to accompany people on their first few practice journeys to help them learn how to travel the network independently, and assist virtually using apps available on most smartphones.

New and improved routes will help to provide a suitable alternative mode of travel for disabled people who currently travel by bus (44 per cent) and for those switch modes due to the proposed user charges. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4. All TfL buses are wheelchair accessible and travel by wheelchair or mobility scooter is free on buses. Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This will help support disabled people not eligible for or not in receipt of our existing public transport travel concessions for disabled people. This includes free pay as you go cross-river bus journeys and free pay as you go DLR journeys (refunded)

⁶⁹ [TfL \(2019\), Travel in London: Understanding our diverse communities](#)

between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents. The entire DLR network is step-free.

Disabled people who use taxis and PHVs for cross-river travel will benefit from the exemption from the proposed user charges for taxis (all of which are wheelchair accessible and have other accessibility features) and wheelchair accessible PHVs. This will help ensure that there is not a reduction in the number of available taxis, and that the availability and cost of using wheelchair accessible PHVs do not impact accessibility for disabled people. The exemption for wheelchair accessible PHVs and taxis is likely to have a disproportionate positive impact on disabled people.

PHVs which are neither wheelchair accessible nor ZEC will pay the proposed user charges. Approximately one per cent of the PHV fleet is wheelchair accessible. Therefore, disabled people using PHVs for travel regularly may be more likely to use a non-wheelchair accessible PHV. LTDS data shows that disabled people in the host boroughs use PHVs more regularly than non-disabled people, however the usage is similar pan-London.

A small number of PHV drivers may refuse cross-river bookings due to the proposed user charges. However, the reductions in congestion and journey times may conversely mean that PHV drivers are more inclined to accept bookings requiring travel via the tunnels.

The price will likely be absorbed into fare prices or incorporated into the pricing structure, meaning potentially increased fares. However, the improved journey times and reliability will help to offset this potential increase in cost. Some disabled people using PHVs may also be eligible for subsidised travel by PHV through the Taxicard⁷⁰ scheme.

Furthermore, alongside other policies such as age limits on PHVs, from 2023 all PHVs licensed for the first time must be ZEC and it is expected that all PHVs will be ZEC by 2033, meaning the impact will diminish over time as vehicle fleets are upgraded. 58 per cent of PHV fleet is now fully electric or ZEC (January 2024), an increase of 11 per cent since October 2023.

The community transport (Vehicles with 9+ seats) 100 per cent discount helps ensure disabled people reliant on community and charitable transport for cross-river travel are not negatively impacted due to reduced or cut services resulting from the proposed user charges. This discount, alongside the improved journey times and reliability is likely to have a positive impact on disabled people reliant on services such as Dial-a-Ride.

Some disabled people may be reliant on a domiciliary, voluntary, or informal carer or PA to help them with cross-river travel by private vehicle. As set out further in Section 8.2.6, there is a risk that the proposed user charges could lead to a negative impact on the provision of care cross-river. If this were to occur, it could lead to negative impacts on accessibility for disabled people.

When travelling with a person in receipt of care who has a Blue Badge, carers can apply their vehicle to the badge holder's Road User Charging account prior to travel in order to receive a 100 per cent discount on the user charges. A maximum of two vehicles can be registered to an account. If the carer or PA is the nominated driver for a person eligible for

⁷⁰ The Taxicard scheme provides subsidised taxi and minicab travel in London for certain people with mobility impairments and who have trouble using public transport (subject to eligibility).

a vehicle to be registered in the Disabled Tax Class, they are able to receive an exemption. Furthermore, if transporting a disabled person to an eligible NHS appointment, they may be able to claim a reimbursement of the user charges.

Some carers and PAs may be eligible for a 50 per cent discount on the user charges through the east London low-income residents' discount. Furthermore, we are providing a £1 discount on the off-peak user charges for eligible sole traders, charities, and small businesses registered in the host boroughs and free pay as you go bus and certain DLR river crossings for local residents, for at least one year following tunnel opening, and a 100 per cent discount for community transport (Vehicles with 9+ seats) and a 100 per cent discount for certain operational vehicles of the host boroughs such as meals on wheels.

The improvements in journey times and reliability may also mean that cross-river travel via the tunnels becomes a more viable option for carers, and help to provide an improvement in accessibility for older people reliant on them for cross-river travel. As such, whilst we believe that our proposed discounts and exemptions will help to mitigate negative impacts on the provision of care whilst ensuring we achieve our project objectives, it is important that we monitor how the scheme is affecting cross-river care provision and ensure we seek to address these impacts should they have a negative impact on protected characteristic and disadvantaged groups. In line with Policy 15 of the CPAP, we will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening.

Additionally, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended that we provide targeted communications to carers to raise awareness of the discounts and exemptions they or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan.

8.1.5 Religion or Belief

The baseline data in Section 7.6.1 shows that the LSA is religiously diverse, with 38 per cent identifying their religion as Christian, four per cent Hindu and eight per cent Muslim in south of the river and 34 per cent, four per cent and 29 per cent respectively north of the river.

The proposed user charges may present a financial barrier and impact access to cross-river religious centres or activities for some people in low-income households. This may mean that some who do not meet eligibility for the proposed discounts and exemptions may need to change how they access cross-river religious centres or activities.

However, people of different religions and beliefs in low-income households in the boroughs eligible for the east London low-income residents' discount reliant on car trips cross-river will benefit from the discount. This could mitigate negative changes in accessibility resultant from financial impact of the proposed user charges in addition to the improvements in journey times and reliability.

Furthermore, the improvements to the public transport cross-river through the introduction of two new bus services through the Silvertown Tunnel and improvements to journey times on existing services due to the new tunnel and user charges will help to mitigate potential negative impacts on ability to travel through the tunnels. With a total of 21 zero-emission

buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys and free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George to support local residents and a cross-river cycle shuttle-bus, free for at least 12 months.

Religious groups may use community transport vehicles to access religious or community events and services. The 100 per cent discount for community transport (Vehicles with 9+ seats) helps to ensure that people reliant on community transport to access community religious and social events and community facilities cross-river are not negatively impacted due to reduced or cut services resultant of the proposed user charges. This discount may therefore have a positive impact on people using this mode of travel.

8.1.6 Race

The Scheme will provide a new cross river link and improved bus connections to services and facilities both sides of the river. The baseline (Section 7.7.1) identified that of the population in the LSA north of the river 39 per cent identified as White, 35 per cent identified as Asian and 16 per cent identified as Black, with 58 per cent, 15 per cent and 16 per cent respectively south of the river. As recognised in 7.13.5, the Scheme is in an area of high deprivation and people from ethnic minorities are more likely to live in the most deprived neighbourhoods in England.

Analysis of the responses to the consultation found that when the Silvertown Tunnel opens, Black, Asian and Other Ethnic Group respondents have a greater intention to use the Silvertown Tunnel at least once a week or more (31 per cent) than White respondents (17 per cent). It also found that Black, Asian and other Ethnic groups were more likely to use the bus (20 per cent) compared to White respondents (13 per cent), and Black, Asian and Other Ethnic Group respondents were more likely to use the Tunnel 2-3 times a week or more (38 per cent) than White respondents (24 per cent). LTDS data shows that Black Londoners are more likely to use the bus (69 per cent use this mode at least once per week) and less likely to travel by car or rail than other Londoners.

New and improved bus routes will help to provide a suitable alternative mode of travel for people who switch modes due to the proposed user charges, or regularly travel by bus. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys and free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents and a cross-river cycle shuttle-bus, free for at least 12 months.

The proposed user charges may have a negative financial impact on a small number of Black, Asian and minority ethnic people who use a personal vehicle to regularly travel cross-river due to fear of harassment on public transport. This cost may have an effect on accessibility to cross-river facilities and social connections. However, this impact may be mitigated through the provision of the east London low-income residents' discount (subject to eligibility).

For those who continue to use personal vehicles for travel cross river, the improved journey times and reliability will help to mitigate the potential financial costs. The overall impact on accessibility is considered to be neutral.

LTDS data shows that Black Londoners are slightly more likely to use PHVs for travel than other ethnic groups. Due to the user charges for non-ZEC and non-wheelchair accessible PHVs, there may be a potential increase in fares for these journeys.

This impact is considered to be limited and offset by improvements to journey times and availability of alternatives, including the bus (with new and improved services cross-river) and taxis. Furthermore, the improvements in journey times and congestion may improve the availability of PHVs for cross-river trips.

8.1.7 Homeless People and Asylum Seekers/Refugees

The new cross-river link and improved bus connections provide a greater access to services and facilities across the river for asylum seekers, refugees, and homeless people.

These groups may be more reliant on community transport provided by community or charitable organisations. The provision of a 100 per cent discount for community transport (Vehicles with 9+ seats) will benefit charities and organisations that support these groups and helps to ensure that these services are not reduced or cut due to the proposed user charges. These services will also benefit from reduced journey times and improved reliability due to the Scheme.

For some homeless people, asylum seekers and refugees who drive, the proposed user charges may present a financial barrier, and some may face barriers to applying for Auto Pay, meaning they are unable to benefit from cheaper off-peak charges. This could impact accessibility (including access to community facilities). However, the east London low-income residents' discount (subject to eligibility) in addition to improved journey times and reliability, and improved bus speeds and service provision through the tunnels help to offset potential negative impacts on accessibility for people who make regular cross-river trips for work and training purposes, with a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys and free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents and a cross-river cycle shuttle-bus.

Some homeless people, asylum seekers and refugees may be less able to demonstrate eligibility for the east London low-income residents' discount. However, this is considered

to be offset by improved bus speeds and service provision through the tunnels providing an alternative mode of travel. Furthermore, it is anticipated that only a small number of homeless people, asylum seekers and refugees will use the tunnels frequently and the improved journey times and reliability may offset the cost of the user charges if they decide to travel via the tunnels using private vehicle.

8.1.8 People on Low Incomes

Parts of the LSA are considered relatively deprived, for example 96 per cent of LSOAs in Newham are in the 50 per cent most income deprived deciles in England, with 87 per cent of LSOAs in Tower Hamlets and 77 per cent in Greenwich. In addition, a high proportion of the population have no access to a car. These people are therefore likely to be more reliant on walking, cycling and public transport than other groups. The baseline showed that 29 per cent of the population in the north LSA and 23 per cent in south are economically inactive.

Whilst we have proposed the east London low-income residents' discount to help support people on low incomes, the proposed user charges may still present a financial barrier for some people on lower incomes, and some may not meet eligibility for the east London low-income residents' discount. This may lead to changes in cross-river travel and impact accessibility.

Londoners on lower incomes are more likely to travel by bus than drive. The improvements to cross-river public transport through the introduction of new and improved bus services through the Silvertown and Blackwall tunnels will help mitigate potential negative impacts on ability to travel through the tunnels. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys, free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V and a cross-river cycle shuttle-bus, free for at least 12 months. Some people on low incomes may also be eligible for the Bus and Tram Discount Photocard or Jobcentre Plus Travel Discount (subject to eligibility) providing reduced fares on buses. The bus and DLR concessions proposed as part of the green and fair package of concessions and discounts could have a greater positive impact for people on low incomes, whose most common mode of travel in London is bus, compared to people not on low incomes.

Therefore, whilst low-income groups may experience a reduced ability to pay cross river vehicle charges compared to those on higher incomes, the provision of new bus routes together with improvements to journey times and reliability for existing routes will help offset this impact. This will also increase access to a wider range of additional services and facilities.

Low-income residents who use the tunnels for travel regularly, will benefit from improved journey times and reliability when travelling by private vehicle.

The community transport (Vehicles with 9+ seats) 100 per cent discount helps ensure that people on low incomes reliant on community and charitable transport for cross-river travel to access education, community and religious facilities are not negatively impacted due to reduced or cut services resultant of the proposed user charges. Access to these facilities will also be improved through improved journey times.

The inclusion of the NHS patient reimbursement of the proposed user charges will help ensure that some people on low incomes requiring use of a private vehicle to access healthcare appointments cross-river are not negatively impacted by the proposed user charges (subject to eligibility).

Improved journey times will be experienced by people on low incomes using the tunnels to access healthcare services but are required to pay the charge, helping to ensure appointments are not missed. These residents may also be eligible for the east London low-income residents' discount helping to mitigate the potential financial impact.

8.1.9 Pregnancy and Maternity

The Barkantine Birth Centre, Newham Hospital, and Queen Elizabeth Hospital are located in close proximity to the LSA and provide maternity services.⁷¹

Pregnant and maternal people may prefer travel by car for comfort and safety purposes. Some may be eligible for the east London low-income residents' discount, and all will benefit from improved accessibility due to improved journey times and reliability, which may also lead to improved access to a greater range of facilities and lower risk of missing appointments. Some may also be eligible for the NHS Patient reimbursement scheme when travelling for medical appointments.

Some pregnant and maternal people may prefer to use PHVs. Due to the user charges for non-ZEC and non-wheelchair accessible PHVs, there may be a potential increase in fares for these journeys. This impact may be offset by improvements to journey times and availability of PHVs for cross-river trips.

8.1.10 Sex

The Scheme will provide a new cross-river link and improved bus connections to education, healthcare, community facilities and places of worship both sides of the river. The baseline data (Section 6.4.2) showed that women are slightly more likely to travel by bus than men. Women will benefit from the new cross river link, new bus services and wider public transport connections.

Men are more likely than women to travel across the river at least once per week, but women are more likely than men to use public transport for this journey. However, women are more likely than men to have concerns regarding their personal safety when using public transport. The proposed user charges may have a negative financial impact on women who use a personal vehicle to regularly travel cross-river due to personal safety concerns when using public transport. This cost may influence accessibility to cross-river services and social connections. This impact may be mitigated through the provision of the east London low-income residents' discount (subject to eligibility). Additionally, we are committed to improving safety and reducing harassment and violence across our public

⁷¹ [NHS Maternity Services](#)

transport network. The ongoing work we are undertaking to improve safety and security and raise awareness for customers on how to help prevent, report or call out harassment and assault may help women feel more comfortable travelling cross-river using public transport.

For those who continue to use personal vehicles for travel cross river, the improved journey times will help to mitigate the potential financial costs.

Due to the charge for non-ZEC and non-wheelchair accessible PHVs using the tunnels, there may be potential increases in fares for these journeys. LTDS data shows that women are slightly more likely to use PHVs for travel than men. This impact is considered to be limited and offset by improvements to journey times and availability of alternatives (such as taxis).

8.1.11 Sexual Orientation and Gender Reassignment (LGBT)

The baseline data (Section 7.8) shows that around three per cent of the population in the LSA and Sub-Region are LGBT. LGBT people are more likely to face challenges when using public transport due to crime, intimidation and abuse.

The proposed user charges may have a negative financial impact on a small number of LGBT people who use a personal vehicle to regularly travel cross-river due to fear of harassment on public transport. This cost may influence accessibility to cross-river services and social connections. This impact may be mitigated for some through the provision of the east London low-income residents' discount (subject to eligibility). Additionally, we are committed to improving safety and reducing harassment and violence on our public transport network. The ongoing work we are undertaking to improve safety and security and raise awareness for customers on how to help prevent, report or call out harassment and assault may help LGBT people feel more comfortable travelling cross-river using public transport.

For those who continue to use personal vehicles for travel cross river, the improved journey times will help to mitigate the potential financial costs. Furthermore, some trans people may be eligible for the NHS patient scheme when travelling to healthcare facilities.

Due to the charge for non-ZEC and non-wheelchair accessible PHVs using the tunnels, there may be potential increases in fares for these journeys. This may impact LGBT people who prefer to use PHVs to access services and social connections cross-river due to barriers to public transport use. This impact is considered to be limited and offset by improvements to journey times and availability of alternatives (such as taxis). Furthermore, the improvements in journey times and congestion may improve the availability of PHVs for cross-river trips.

8.2 Access to Work and Training

8.2.1 Introduction

Access to work and training can have beneficial impacts on both the health and life prospects of local populations. The Scheme is located in some of the most economically deprived areas of London.

As stated in the UCAF, the forecast reduction in vehicle journey time and improvement in journey time reliability through the Blackwall Tunnel will benefit local residents. In the opening year, car commuters are forecast to save 1,500 vehicle-hours per day with public transport commuters saving 900 passenger-hours per day (07:00-19:00). Faster and more reliable journey times will also apply to those commuting or travelling for work by van. Although the proposed user charges will be a new cost for residents, the overall value of time savings to tunnel users is forecast to outweigh the cost, resulting in a net benefit. Some residents from low-income households will also qualify for a discount to reduce the cost of the user charge for motorcycles, cars and vans.⁷²

New cross-river bus routes (129 & SL4) and lower journey times on the Route 108 mean residents on the Greenwich Peninsula will be able to access over 43,000 more jobs within a 60-minute journey. Similarly, residents of West Silvertown will be able access over 21,000 more jobs within a 60-minute journey.

People travelling for work and business purposes will also see benefits to their commute. The UCAF states that the forecast reduction in vehicle journey time and improvement in journey time reliability through the Blackwall Tunnel will be particularly beneficial for businesses. In the opening year, people travelling on business (including light goods vehicles and heavy goods vehicles drivers) are forecast to save 5,800 vehicle-hours per day due to the Scheme. Furthermore, for at least 12 months following Scheme opening small businesses, sole traders and charities based in the host boroughs will benefit from a £1 discount on the standard off-peak charges (subject to eligibility).

However, there is potential for the financial impacts of the proposed user charges to influence the ability for some protected characteristic and disadvantaged groups, who currently travel cross river by motorcycle, car or van to access work and training. While van charges are proposed to be higher, van ownership in the host boroughs and across London is comparatively low (see Section 7.2.3).

8.2.1.1 Summary

Table 46 summarises the overall equality impacts of the proposed user charges on Access to Work and Training. Sections 8.2.2– 8.2.6 provide further details on the factors which have been considered as part of this assessment and the conclusions reached.

Table 46: Access to Work and Training Summary

<p>Summary</p>	<p>The 100 per cent discount for Blue Badge Holders and exemption for disabled tax class vehicles helps to ensure that access to work and training is not impacted for eligible disabled people who may be more reliant on use of a car for cross-river travel.</p> <p>Similarly, the exemption for taxis and ZEC and wheelchair accessible PHVs, and community transport (Vehicles with 9+ seats) 100 per cent discount ensure disabled people who may be reliant on these vehicles for access to work and training are not impacted by reduced service provision (or increased fares) due to the proposed user charges. Thus, helping to eliminate unlawful discrimination, advance equality of</p>
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⁷² Passenger carrying vehicles not exceeding 2.44m in height

opportunity, and foster good relations by enabling disabled people who may be reliant on car, wheelchair accessible PHVs or community transport vehicles to benefit from improved to access work and training.

The 100 per cent discount for community transport (Vehicles with 9+ seats) may also ensure homeless people and asylum seekers and refugees reliant on these vehicles for access to work and training opportunities are not impacted by reduced or cut services, helping to eliminate unlawful discrimination, advance equality of opportunity and foster good relations by enabling those who may be reliant on community transport vehicles to benefit from improved to access work and training.

The east London low-income residents' discount will help to mitigate potential negative impacts on access to work and training for eligible people on low incomes who travel frequently by private vehicle including van. This may also benefit people who also fall into other groups who are more likely to be on low incomes, such as older people, Black, Asian and minority ethnic people, and disabled people. Thus, helping to eliminate unlawful discrimination, advance equality of opportunity and foster good relations by ensuring people on low incomes who may be reliant on the car or community transport vehicles are able to benefit from improved to access work and training by private vehicle.

For at least 12 months following Scheme opening small businesses, sole traders and charities based in the host boroughs will benefit from a £1 discount on the standard off-peak charges (subject to eligibility).

Negative impacts associated with the proposed user charges on access to work and training for those not eligible for discounts and exemptions are considered to be offset by improved travel times. Furthermore, the provision of improved cross-river bus services, with improved journey times and service reliability is considered to provide a viable alternative mode of travel cross-river. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4. Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport and cycling for cross-river journeys in southeast London.

The improvements to cross-river accessibility by public transport and other vehicles are considered to help advance equality of opportunity and foster good relations by improving access to cross-river work and training.

If the user charges were to lead to an impact on the number of care workers travelling cross-river, existing pressures on the provision of

	<p>domiciliary care in east London may be exacerbated, and if changes in the level of care were seen it could lead to a disproportionate negative impact on disabled people and older people, who are more likely to be in receipt of care. Furthermore, if the user charges were to negatively impact on the provision of care cross-river by voluntary and charitable organisations, this could negatively impact on multiple protected characteristic and disadvantaged groups in London, including young people, older people, disabled people, homeless people, and asylum seekers and refugees. Due to the demographics of the local area, there may also be indirect negative impacts on people on low incomes and ethnic minority groups.</p> <p>A potential disproportionate negative impact has been identified on access to work for PHV drivers on low incomes due to the proposed user charges for non-ZEC and non-wheelchair accessible PHVs. This impact is expected to reduce over time as vehicles are upgraded to meet licensing requirements. Due to the demographics of PHV drivers, this could have a secondary disproportionate impact on people of Asian ethnicity and Muslims.</p> <p>It is considered that the proposed user charges, with the proposed discounts and exemptions, demonstrate that they have been developed with due regard for the three objectives under S.149(1) of the Equality Act 2010, and do not lead to an overall disproportionate or differential impact on access to work and training for any protected characteristic or disadvantaged groups.</p>
Overall rating of impact	Neutral
Overall Impacts identified for protected characteristic and disadvantaged groups	<p>A potential disproportionate negative impact on access to work has been identified for PHV drivers on low incomes who do not own a ZEC or wheelchair accessible PHV. These drivers may lose out on work opportunities as they may be unable to cover the user charges themselves or could potentially lose out on bookings where they add the charge to the fare. Whereas PHV drivers with ZEC vehicles may be able to offer a lower fare due to their 100 per cent discount.</p> <p>If the user charges were to lead to an impact on the number of care workers travelling cross-river, existing pressures on the provision of domiciliary care in east London may be exacerbated, and if changes in the level of care were seen it could lead to a disproportionate negative impact on disabled people and older people, who are more likely to be in receipt of care. Furthermore, if the user charges were to negatively impact on the provision of care cross-river by voluntary and charitable organisations, this could negatively impact on multiple protected characteristic and disadvantaged groups in London, including young people, older people, disabled people, homeless people, and asylum seekers and refugees. Due to the demographics of the local area,</p>

Mitigations required	there may also be indirect negative impacts on people on low incomes and ethnic minority groups.
	The potential impact on PHV drivers will diminish over time as PHVs are replaced with ZEC vehicles to meet licensing requirements, with all PHVs expected to be ZEC by 2033. It is therefore considered that no mitigation is required. PHV drivers on low incomes may also be eligible for the east London low-income residents' discount, helping to offset the cost.
	<p>Whilst we believe that our proposed discounts and exemptions will help to mitigate negative impacts on the provision of care whilst ensuring we achieve our project objectives, it is important that we monitor how the scheme is affecting cross-river care provision and ensure we seek to address these impacts should they have a negative impact on protected characteristic and disadvantaged groups. In line with Policy 15 of the CPAP, we will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening.</p> <p>Additionally, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended that we provide targeted communications to carers to raise awareness of the discounts and exemptions they or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan.</p>

8.2.2 Age

The baseline data (Section 7.3.3) shows that people aged 35-44 are the age group most likely to cross the Thames at least once a week for travel to work (commuting) purposes, at 34 per cent. This is followed by people aged 16-34 (30 per cent) and people aged 45-54 (28 per cent). Only three per cent of people aged 65+ cross the Thames to commute to work.

Public transport has a larger share across all age groups, particularly among people aged under 35 and aged 55-64. People aged 35-64 are the most likely age group to cross the Thames by car (as a driver or passenger).

The proposed user charges may present a financial barrier to a small number of working age people seeking or accessing existing work and training opportunities, particularly for those on low incomes who require their vehicle to access to work and training cross-river. This potential negative impact is offset by the inclusion of the east London low-income residents' discount (subject to eligibility). Additionally, the improvements to existing bus service journey times and introduction of two new bus services through the Silvertown Tunnel helps to ensure that alternatives modes of travel are available. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

Furthermore, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys to support local residents, free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V and a cross-river cycle shuttle-bus free for at least 12 months. All TfL buses are wheelchair accessible and travel by wheelchair or mobility scooter is free on buses, and the entire DLR network is step-free.

For those not eligible for the discount and requiring use of their vehicle to access work and training, the improvements in journey times and reliability help to mitigate the financial impact of the proposed user charges.

Furthermore, the improved cross-river journey times by car and by bus may increase the catchment of jobs within commuting distance of their place of residence, increasing accessibility to new opportunities.

Taxi drivers in London are more likely to be older, with 62 per cent aged 54 years and above. The exemption for London Licensed Taxis will help to ensure that taxi drivers do not experience an increase in personal costs to undertake cross-river bookings. These drivers will also benefit from the improved journey times due to reductions in congestion when undertaking cross-river bookings. The improved journey times and reliability may also enable them to undertake more jobs during their working hours.

8.2.3 Disability

The baseline data (Section 7.9.3) shows that five per cent of disabled people cross the Thames in east/southeast London for commuting to work purposes at least once a week. This is significantly lower than for non-disabled people (30 per cent). Disabled people are also more likely to be unemployed than non-disabled people. The car is an important mode of travel for many disabled people due to the barriers faced when trying to access public transport.⁷³ The baseline data (Section 7.9.2) also shows that around one quarter of disabled Londoners travel by car as a driver at least once per week. Some disabled Londoners may prefer or need to travel by this mode due to barriers or challenges using public transport (including safety and harassment concerns). Disabled people who prefer or need to drive may be negatively impacted by the proposed user charges. However, they will benefit from the improvements to journey times and journey reliability from the Scheme in addition to the increased accessibility provided by the improvements to journey times. To help mitigate negative impacts on accessibility for disabled people resultant of the user charges, we have proposed a number of discounts, exemptions, reimbursements and travel concessions.

Disabled people who are Blue Badge Holders will benefit from the proposed 100 per cent discount for Blue Badge Holders. Furthermore, disabled people with a disabled tax class vehicle will benefit from the proposed exemption for vehicles with a disabled tax class. These discounts and exemptions help to ensure that disabled people who may need to travel by car do not experience reduced access to work and training resultant of the financial implications of the proposed user charges.

⁷³ [Motability \(March 2022\), The Transport Accessibility Gap](#)

Some disabled people will also be eligible for the east London low-income residents' discount, helping to mitigate the impact of the proposed user charges on disabled people. Previous research has shown that around 61 per cent of disabled Londoners are on low incomes.⁷⁴

Furthermore, for those who choose to switch modes due to the financial cost of the user charge, we offer a free Travel Mentoring Scheme to help people using public transport in and around London to become more confident and independent travellers. Travel mentors can give advice by telephone and email to help plan an accessible route, provide a mentor to accompany people on their first few practice journeys to help them learn how to travel the network independently, and assist virtually using apps available on most smartphones.

New and improved routes will help to provide a suitable alternative mode of travel for disabled people who switch modes due to the proposed user charges. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4. Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London, which will help support disabled people not eligible for or not in receipt of our existing public transport travel concessions for disabled people. This includes free pay as you go cross-river bus journeys to support local residents, free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V and a cross-river cycle shuttle-bus, free for at least 12 months. All TfL buses are wheelchair accessible and travel by wheelchair or mobility scooter is free on buses, and the entire DLR network is step-free.

Some disabled people may access work and training opportunities via community transport vehicles provided by local authorities and charitable organisations. The inclusion of a 100 per cent discount for community transport (Vehicles with 9+ seats) means that disabled people who are reliant on the use of these vehicles to access work and training opportunities are not negatively impacted by a charge leading to reduced or cut services. Access to cross-river opportunities will also be improved through improved journey times.

Some disabled people may be transported to work or training by a carer such as a PA, or a voluntary or informal carer. As highlighted in Section 8.2.6, there is a risk that the user charges could lead to negative impacts on the provision of care cross-river. If this impact were to arise, it could have a disproportionate negative impact on access to work and training opportunities for disabled people if they are unable to travel to work or training without assistance.

Within our proposed user charges, there are certain discounts and exemptions in place which may help to mitigate this potential impact. This includes the 100 per cent discount for Blue Badge holders. A maximum of two vehicles can be registered to a Blue Badge holder's account to receive the discount, which may be of benefit for people providing travel for the person they provide care to as part of their duties.

⁷⁴ [TfL \(2019\), Travel in London: Understanding our diverse communities](#)

A person providing domiciliary care or employed as a PA may be the nominated driver for a person with a disability who is entitled to or owns a vehicle in the disabled tax class. This may allow their vehicle to be eligible for an exemption from the user charges.

A carer may also be eligible for a 50 per cent discount on the user charges if living in east London and in receipt of certain income-related benefits, including carer's allowance. If living in the same household as the person who is eligible for the east London low-income resident's discount, they may also be able to apply the discount to their vehicle if no other vehicle in the household has been registered to the eligible Road User Charging account.

Whilst we believe that our proposed discounts and exemptions will help to mitigate negative impacts on the provision of care whilst ensuring we achieve our project objectives, it is important that we monitor how the scheme is affecting cross-river care provision and ensure we seek to address these impacts should they have a negative impact on protected characteristic and disadvantaged groups. In line with Policy 15 of the CPAP, we will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening.

Additionally, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended that we provide targeted communications to carers to raise awareness of the discounts and exemptions they or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan.

Due to the barriers faced when using public transport, taxis and PHVs may provide an important mode of travel for disabled people, particularly those who are unable or choose not to drive. Taxi and PHV usage are similar for disabled and non-disabled Londoners. However, LTDS data shows (Section 6.9.2) that disabled people in the host boroughs use PHVs more regularly than non-disabled people.

It is important to recognise the role these may play for disabled people in accessing work and training opportunities. Disabled people who use taxis and PHVs for cross-river travel to work and training will benefit from the exemption from the proposed user charges for taxis (all of which are wheelchair accessible and have other accessibility features) and wheelchair accessible PHVs. This will help ensure that there is no reduction in the number of available taxis, and that the availability and cost of using wheelchair accessible PHVs does not impact accessibility for disabled people. This exemption could have a disproportionate positive impact on access to work and training for disabled people reliant on the use of taxis and wheelchair accessible PHVs.

However, non-ZEC and non-wheelchair accessible PHVs will pay the proposed user charges. Approximately one per cent of the PHV fleet are wheelchair accessible. Therefore, disabled people using PHVs regularly may be more likely to use a non-wheelchair accessible PHV. Circa 43 per cent of PHVs are ZEC as of February 2024, and this number will continue to increase as vehicles are upgraded to meet licensing requirements. The entire PHV fleet is expected to be ZEC by 2033.

Due to the flexibility of fares in the PHV industry, drivers may be able to add this additional cost into their pricing structure for undertaking cross-river bookings, as per the terms and conditions of the larger third-party booking companies which state that tolls are added to fares, and as seen in the Congestion Charge Zone where the charge is added to fares by

the largest providers. However, the improvements to journey times will help mitigate this cost. Furthermore, some disabled people using PHVs may also be eligible for subsidised travel through the Taxicard scheme. A small number of PHV drivers may refuse cross-river bookings, but this is likely to be a limited number, and alternatives (such as taxis and PHVs provided by alternative operators) are available. The improvements in congestion for cross-river travel may also increase the number of PHV drivers willing to undertake cross-river bookings.

It is considered that the overall impact of charging non-ZEC and non-wheelchair accessible PHVs is neutral on access to work and training for disabled people.

8.2.4 Homeless People and Asylum Seekers/Refugees

Homeless people and Asylum Seekers/Refugees may be more reliant on community transport provided by community or charitable organisations to access work and training opportunities.

The provision of a 100 per cent discount for community transport (Vehicles with 9+ seats) helps to ensure that these services are not reduced or cut due to the proposed user charges. These services will benefit from reduced journey times and improved reliability due to the Scheme.

For some homeless people, asylum seekers and refugees who drive, the proposed user charges may present a financial barrier to accessing existing or potential work and training opportunities cross-river, and some may face barriers to applying for Auto Pay, meaning they are unable to benefit from cheaper off-peak charges. However, the east London low-income residents' discount (subject to eligibility) in addition to improved journey times and reliability, and improved bus speeds and service provision through the tunnels help to offset potential negative impacts on accessibility for people who make regular cross-river trips for work and training purposes.

Some homeless people and Asylum Seekers/Refugees may be less able to demonstrate eligibility for the east London low-income residents' discount. However, this is considered to be offset by improved bus speeds and service provision through the tunnels providing an alternative mode of travel. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys to support local residents, free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V and a cross-river cycle shuttle-bus, free for at least 12 months.

8.2.5 People on Low Incomes

As shown in the baseline data (Section 7.13.5), income deprivation levels are high in the local area. However, people on low incomes in London are less likely to drive at least once per week and less likely to own a car, and more likely to travel by bus. The baseline data also shows that people in lower social grades (C2, D, E) are much less likely to travel

across the Thames in east and southeast London for travel to work purposes. However, they are more likely to travel by car than people in higher social grades when travelling across the Thames in this area.

The proposed user charges may present a financial barrier for some people on lower incomes who travel by car. This may lead to changes in cross-river travel and impact access to work and training opportunities which the Silvertown Tunnel provides improved access to. However, residents on low incomes may be eligible for the east London low-income residents' discount. This could mitigate negative changes in access to work and training resulting from the financial impact of the proposed user charges. In addition, the improvements to the public transport cross-river through the introduction of new bus services through the Silvertown Tunnel will help to mitigate potential negative impacts on ability to travel through the tunnels. With a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

Additionally, as part of the green and fair package of concessions and discounts we are providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free pay as you go cross-river bus journeys to support local residents, free pay as you go DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V and a cross-river cycle shuttle-bus, free for at least 12 months. Some people on low incomes may also be eligible for the Bus and Tram Discount Photocard or Jobcentre Plus Travel Discount (subject to eligibility) providing reduced fares on buses. The bus and DLR concessions proposed as part of the green and fair package of concessions and discounts could have a greater positive impact for people on low incomes, whose most common mode of travel in London is bus, compared to people not on low incomes.

As shown in the baseline data, the bus is the most common mode of travel for people on low incomes behind walking. For low-income residents who choose to continue to drive through the tunnels for access to work and training, the reductions in journey times and reliability may offset the financial cost.

Non-ZEC and non-wheelchair accessible PHVs will pay the proposed user charges. As of January 2024, circa 43 per cent of PHVs are fully electric/ZEC, and it is expected that the entire fleet will be ZEC by 2033. Less than one per cent of PHVs are wheelchair accessible.

Due to the flexibility of fares in the PHV industry, drivers may be able to add this additional cost into their pricing structure for undertaking cross-river bookings, as per the terms and conditions of the larger third-party booking companies which state that tolls are added to fares, and as seen in the Congestion Charge Zone where the charge is added to fares by the largest operators. However, ZEC PHVs would not incur this charge which could lead to a lower fare for customers in some cases. As fares vary by a number of factors, it is difficult to determine to what extent this may impact drivers of non-ZEC PHVs.

Previous licensing data has shown a correlation between where PHV drivers live and areas of the highest deprivation in London. Therefore, the proposed user charges may have a disproportionate negative impact on access to work for PHV drivers on low incomes who drive a non-ZEC PHV or non-wheelchair accessible PHV.

Due to the demographics of PHV drivers, this could have a secondary disproportionate impact on people of Asian ethnicity and Muslims. Our data⁷⁵ on the race of PHV drivers in London highlights that 42 per cent are Asian and 15 per cent are Black. 28 per cent reported their religion as Islam/Muslim. However, actual figures may be different as a large proportion of drivers declined to state their race or religion.

Specific mitigations are not considered necessary for this potential impact. Circa 43 per cent of PHVs in London are ZEC, and this proportion will continue to increase as vehicles are replaced with ZEC vehicles to meet licensing requirements and should therefore be fully mitigated by 2033. The impact will therefore diminish over time. Furthermore, PHV drivers who live in the area may be eligible for the east London low-income residents' discount, helping to offset the cost. Some may also be eligible for the £1 discount on the standard off-peak charges for small businesses and sole traders registered in the host boroughs for at least one year following tunnel opening (subject to eligibility).

The 100 per cent discount for ZEC and wheelchair accessible PHVs only applies when the PHV driver is undertaking a booking. Therefore, all PHV drivers may have to cover the user charges to travel cross-river to undertake a new booking or return to the other side of the river (if this is not covered by the operator). PHV drivers on low incomes operating the in the area may be eligible for the east London low-income residents' discount when using the tunnels and not undertaking a booking. They may also be able to use alternative crossings (such as Rotherhithe) to negate this charge to return to the opposite side of the river for bookings or return cross-river with a new booking.

Due to the flexibility of fares in the PHV industry, drivers may be able to add this additional cost into their pricing structure for undertaking cross-river bookings, as per the terms and conditions of the larger third-party booking companies which state that tolls are added to fares, and as seen in the Congestion Charge Zone where the charge is added to fares by the largest operators.

8.2.6 Carers

As highlighted in Section 7.12, care workers are amongst the lowest paid workers in the UK. Many people working in the domiciliary care sector are not paid for time spent travelling between jobs, and in Greater London a large proportion of domiciliary care workers drive to carry out their work duties. Whilst many have their travel expenses covered, this ultimately comes at a cost to the organisations, many of whom have expressed concern about the rising costs of covering travel for care workers.⁷⁶

If carers are not reimbursed for the user charges by their employer, the additional work-related cost may impact their take-home earnings and some care workers may decide to change jobs if they are required to regularly travel cross-river via the tunnels, in particular where this route could not be avoided or offers the most convenient route to effectively carry out their work. Furthermore, the user charges may present a disincentive to care workers (existing or prospective) taking up care roles cross-river. Therefore, there may be a disproportionate negative impact on access to work and training for domiciliary care

⁷⁵ TfL Data (December 2023)

⁷⁶ [Homecare Association \(March 2022\) Fuel costs and homecare – impact on service capacity](#)

workers on low incomes. Due to the demographics of care workers in London, this may disproportionately impact women, and people from ethnic minority backgrounds.

Nevertheless, it must not be overlooked that the improvements in journey times and reliability may conversely make access to work opportunities cross-river more viable, and lead to improvements in the ability of carers and care organisations to effectively provide care cross-river. Our research also indicates that care staff travel costs are often covered by employers – and this may include the cost of the user charge. Due to many care workers being on low incomes, those who are not reimbursed by their employer but are on low incomes may be eligible for the east London low-income residents' discount.

If carers are reimbursed by their employer for the user charges, and this has not been or cannot be factored into the cost for the provision of care, it may negatively impact on an organisation's budgets. This may be a particular challenge for organisations which are currently contracted to provide care cross-river, but an existing contract does not cover the user charges. If care providers are not able to have the user charges factored into the cost of care when commissioning services, they may choose not to accept care contracts which require cross-river travel due to the potential impact on their budgets.

If the user charges were to lead to an impact on the number of care workers travelling cross-river, existing pressures on the provision of domiciliary care in east London may be exacerbated, and if changes in the level of care were seen it could lead to a disproportionate negative impact on disabled people and older people, who are more likely to be in receipt of care. Furthermore, if the user charges were to negatively impact on the provision of care cross-river by voluntary and charitable organisations, this could negatively impact on multiple protected characteristic and disadvantaged groups in London, including young people, older people, disabled people, homeless people, and asylum seekers and refugees. Due to the demographics of the local area, there may also be indirect negative impacts on people on low incomes and ethnic minority groups.

Following feedback from the consultation with stakeholders and the public, we considered the potential impacts our proposed user charges on carers, and whether a targeted support option for carers was required as part of our proposals. Following this review, we have decided that we will not provide this as part of our initial user charges. This is due to the administrative challenges which may be faced in identifying care workers, the need for regular review of eligibility for any form of targeted support due to the high turnover rates in the industry, and the fact that many carers (if not reimbursed by an employer) may be eligible for our existing support options. Additionally, although a care organisation may be based in the local area, some of their staff may be commuting from areas outside of the host boroughs/east London, and some organisations may also be based outside of the host boroughs/east London but provide care services cross-river. Therefore, we would likely require a wide geographic scope for a support option. This would increase the number of carers potentially eligible for the support option and risk undermining our Project Objectives.

In addition to the east London low-income residents' discount, which we believe many carers may be eligible for in east London, if travelling with the person in receipt of care some carers may also be able to register their vehicle to the Auto Pay account of the person they are providing care to prior to travel in order to receive a 100 per cent discount on the user charges. A maximum of two vehicles can be registered to a Blue Badge

holder's account to receive the discount. This may also be of benefit for people working as a PA or provide care to an individual on a voluntary basis.

If a care organisation is a charity, small business (under 50 employees) or the carer is a registered sole trader based in the host boroughs, they may also be eligible for a £1 discount on the standard off-peak user charges for at least one year after the tunnel opens if the vehicles the carers use are registered to the charity/organisation's Auto Pay account. Some care workers (such as PA's) may be registered as sole traders and some carers may be eligible for free pay as you go bus and certain DLR river crossings, available for at least one year after the tunnel opens,

Some carers may also work on a voluntary basis through charitable organisations or provide informal care to family or friends. The Blackwall Tunnel may currently provide a convenient route for cross-river travel to undertake their care duties, and some may not be reimbursed for their travel costs, particularly as some voluntary organisations may have limited budgets and flexibility, and those providing informal care may be on low incomes. We received feedback during the consultation that some charities don't have their own vehicles but reimburse their staff for use of their private vehicles.

To help support charities transition to paying user charges, we have proposed a £1 discount on the off-peak user charges for small business, sole trader and charities registered in the host boroughs (subject to eligibility). To qualify for the discount, the vehicle needs to be registered for an Auto Pay account in the name of the charity. This is to manage the eligibility criteria of a maximum of three vehicles and limit the potential for fraud.

Following the consultation, we have reviewed the option of charities' employees or volunteers registering private vehicles to receive the discount on behalf of the charity. However, if a private vehicle was registered for the discount on behalf of a charity, each trip made in this vehicle would receive the reimbursement, regardless of whether the trip was made on behalf of the charity or not. This would further risk undermining the demand management objective of the scheme and be open to fraud.

Furthermore, there are other discounts which may apply to certain trips helping to mitigate the potential impacts including a 100 per cent discount for community transport (Vehicles with 9+ seats), 100 per cent discount for certain operational vehicles of the host boroughs such as meals on wheels, and the 50 per cent discount for east London low-income residents.

While we do not propose a targeted support option for carers in paid and voluntary, and informal roles as we believe our existing proposed support options alongside the improvements to journey times and reliability will help to ensure impacts on the provision of care cross-river do not arise, it is important that we closely monitor whether changes occur resultant of the user charges. Policy 15 in the CPAP states we must undertake a review of the user charges not later than 15 months after the Silvertown Tunnel opens for public use, and that we must make changes to the charges to mitigate any significant adverse impacts that have arisen and are attributable to the Scheme. Procedure 5 explains how this review will be undertaken.

Following the opening of the Silvertown Tunnel, we will continue to monitor the impacts (traffic, socio-economic, noise and air quality), and implement any mitigations required, as

set out in Policy 15 of the CPAP. It is recommended that as part of this review, we consider whether any negative impacts on the provision of care cross-river have arisen, and whether any additional support is required.

Additionally, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended that we provide targeted communications to carers to raise awareness of the discounts and exemptions they or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan.

8.3 Active Travel

8.3.1 Introduction

The proposed user charges may impact the mode people choose to travel and could lead to an increase in walking and cycling. Active travel may form part of a stage of a journey to use the new and improved bus services through the tunnels. To help support these additional active travel journey stages, we have undertaken various actions in different areas. In Greenwich, we have upgraded the Boord Street footbridge to provide an accessible link over the A102 to allow access to the bus stop on Tunnel Avenue and will resurface the footways in this area to improve the quality of the pedestrian environment. On the north side of the river, we are making improvements at the Lower Lea Crossing and Leamouth roundabout including wider footpaths and cycleway, kerb buildouts to reduce crossing distance, and improve existing crossing points by adding signalised priority for pedestrians and cyclists as well as adding new crossing points.

Additionally, our preferred option of a new cross-river cycle shuttle-bus (free for at least 12 months) proposed to operate through the Silvertown Tunnel may encourage the use of cycling as a mode of travel for cross-river journeys, in place of using a private vehicle which may be subject to the proposed user charges.

The affordability of the proposed user charges and their role as a demand management tool may result in mode shift which could see an increase in certain groups using active travel modes to a greater extent than others.

Changes in traffic levels and speeds resulting from the proposed user charges may impact perceptions of safety in certain locations and as a result cause reductions in active travel, which may impact certain groups due to the location of these changes. Conversely, reductions in congestion and traffic can lead to improved perceptions of safety.

It is important for us to ensure that the Scheme does not negatively impact opportunities for active travel due to the health benefits of this mode of travel. The baseline data shows that walking is the most common mode of travel for all Londoners, whilst cycling is less likely to be undertaken by women, non-White people, and people on low incomes.

Table 47 summarises the overall equality impacts of the proposed user charges on Active Travel.

8.3.2 Summary

Table 47: Active Travel Summary

Summary	<p>The scheme is not anticipated to cause any significant changes in the ability of people of all groups to undertake active travel due to minor changes in traffic levels on local roads.</p> <p>Some people may switch modes from car to public transport to make cross river trips as a result of user charges. This may lead to small scale increases in active travel as a stage of their journey.</p> <p>No disproportionate or differential impact on protected characteristic and disadvantaged groups identified.</p>
Overall rating of impact	Neutral
Overall Impacts identified for protected characteristic and disadvantaged groups	N/a
Mitigations required	N/a

8.3.3 Assessment

The UCAF concludes that traffic flow and composition is not forecast to change significantly on local roads because of the Scheme.

The volume of traffic (measured in terms of total daily vehicle-kilometres) in Greenwich, Tower Hamlets and Newham is forecast to decrease in all time periods, with the exception of Tower Hamlets in the evening peak (an increase of three per cent) and Newham in the morning peak (an increase of less than one per cent). These increases mostly occur on strategic routes (for example the A12) that are forecast to become more attractive to drivers due to a reduction in congestion on the Blackwall Tunnel approaches.

Traffic on some local roads such as Chrisp Street, Manor Road and Abbott Road is conversely forecast to decrease. In most time periods there is little change in the average speed of traffic, with the exception of an increase from 21kph to 24kph in the morning peak in Greenwich and an increase from 17kph to 19kph in the evening peak in Tower Hamlets. As with the changes in traffic flow, this is primarily caused by improved conditions on strategic routes in these boroughs linked to a reduction in queuing on the Blackwall Tunnel approaches.

The changes in traffic levels and speed due to the proposed user charges will not lead to overall deteriorations in road safety which would have a detrimental impact on protected characteristic and disadvantaged groups. Overall, the impact is neutral and the proposed user charges would not have a disproportionate or differential impact on active travel for protected characteristic and disadvantaged groups.

8.4 Air Quality

8.4.1 Introduction

The Scheme aims to reduce congestion and control increases in traffic flow through user charging. Changes in air quality can have a direct effect on exposure to pollutants and health and wellbeing of populations, including vulnerable populations and particular protected characteristic groups.

The most deprived communities in London commonly live in the most polluted areas, and areas with the lowest NO₂ and PM_{2.5} concentrations have a disproportionately white population.⁷⁷ As demonstrated in the baseline, the local area surrounding Silvertown and Blackwall tunnels have high levels of deprivation and high levels of racial diversity.

Disabled people (particularly with underlying health conditions), young people, older people and pregnant people are more vulnerable to the negative health impacts of poor air quality.

8.4.2 Summary

Table 48 summarises the overall equality impacts of the proposed user charges based on the forecast changes in Air Quality.

Table 48: Air Quality Summary

Summary	Disabled people, young children, older people and pregnant people and their unborn child are more vulnerable to the negative impacts of poor air quality. Black, Asian and minority ethnic people and people on low incomes are more likely to live in areas with poorer air quality in London.
	As stated in the UCAF, the Scheme is forecast not to cause any exceedances of national air quality objectives. Due to the insignificant changes in NO ₂ emissions forecast, there is not expected to be an overall disproportionate or differential impact on any Protected Characteristic or Disadvantaged Groups, and the impact is considered to be neutral.
Overall rating of impact	Neutral

⁷⁷ [Aether \(June 2023\), GLA LAEI AQ Exposure and Inequalities study Part 1 - London analysis](#)

Overall Impacts identified for protected characteristic and disadvantaged groups	N/a
Mitigations required	N/a

8.4.3 Assessment

The Environmental Statement (2016) for the Scheme concluded that concentrations of PM₁₀ and PM_{2.5} are predicted to be below their limit objectives and the impact of the Scheme on particulate concentrations to be generally imperceptible.

The Environmental Statement also concluded that CO₂ emissions were not significant in the base year (2012) and the opening year (anticipated to be 2021 at the time of the report), with and without the Scheme. Unlike NO_x and PM₁₀, emissions of CO₂ are directly linked to fuel use. As such, while advances in vehicle emissions technology result in an improvement in NO_x and PM₁₀ emissions, which offset the increase in traffic between the base year and opening year, overall fuel use tends to increase across the network due to the additional number of vehicles anticipated between 2012 and 2021. Therefore, there is little difference between the CO₂ emissions for the base year and opening year.

Our latest modelling on air quality impacts of the Scheme demonstrate that this remains the case, given that the 2016 Environmental Statement demonstrated that the Scheme would have a negligible impact on particulates and a very small impact on carbon dioxide. Any expected changes in the traffic modelling outputs are unlikely to result in any material changes with respect to these impacts. CO₂ and PM₁₀ emissions will continue to be monitored after the Silvertown Tunnel opens.

As stated in the UCAF, the Scheme is forecast not to cause any exceedances of national air quality objectives (air quality limits and target values for a range of emissions that the UK must comply with for the purposes of National and Local Air Quality Management). Nitrogen dioxide (NO₂) concentration on the A102 south of the Blackwall Tunnel is forecast to decrease by an average of 2.9 micrograms per cubic metre of air (µg/m³) due to the Scheme at the proposed user charge levels.

NO₂ concentration on Silvertown Way and Tidal Basin Road (on the northern approach to the Silvertown Tunnel) are forecasted to slightly increase (by 1.3 µg/m³ and 0.7 µg/m³ respectively). None of these changes are significant. NO₂ concentrations on the A12 north of the Blackwall Tunnel is expected to decrease by 2.4 µg/m³.

Little change is forecast in air quality on neighbouring crossings due to the Scheme. The Rotherhithe Tunnel southern portal is forecast to experience an insignificant increase in

NO₂ concentration (of 0.1 µg/m³) which does not exceed the national air quality objective for NO₂.

Little change is forecasted in air quality on diversion routes and local roads due to the Scheme. An insignificant increase is forecast on the A12 south of Bow Roundabout (+0.7 µg/m³ in NO₂ concentration). A small decrease in NO₂ concentration is forecast on the A13 East India Dock Road (-2 µg/m³), Cotton Street (-1.3 µg/m³), and Abbott Road (-0.6 µg/m³), one of the routes identified as benefitting from a forecast reduction in rat-running due to the Scheme.

Disabled people, young children, older people and pregnant people and their unborn child are more vulnerable to the negative impacts of poor air quality. Black, Asian and minority ethnic people and people on low incomes are more likely to live in areas with poorer air quality in London. However, due to the limited levels of change in air quality resultant of the Scheme, the impact is considered to be neutral for all relevant protected characteristic and disadvantaged groups.

8.5 Noise

8.5.1 Introduction

Changes to noise levels along key routes – both improvements to the current situation as well as increases in noise could occur as a result of the scheme and proposed user charges. These changes may occur in locations which result in a greater impact on certain protected characteristics or disadvantaged groups.

Young people and, some disabled people, and pregnant people may be more sensitive to negative health impacts of increased noise levels from vehicular traffic. People on low incomes and Black, Asian and minority ethnic people may live in areas where noise pollution resultant of vehicular traffic is greater.

8.5.2 Summary

Table 49 summarises the overall equality impacts of the proposed user charges based on the forecast changes in noise.

Table 49: Noise Summary

Summary	Young children, some disabled people, and pregnant people may be more sensitive to noise pollution. People on low incomes and Black, Asian and minority ethnic people may live in areas where noise pollution resultant of vehicular traffic is greater. However, there is no disproportionate or differential impact identified on people due to noise resultant of the Scheme and the impact considered to be neutral.
Overall rating of impact	Neutral

Overall Impacts identified for protected characteristic and disadvantaged groups	N/a
Mitigations required	N/a

8.5.3 Assessment

The UCAF concludes that noise levels on the tunnel approaches are forecast not to change due to the Scheme. An insignificant increase of 1.3 decibels (db) is forecast on Tidal Basin Road. The Scheme is forecasted not to have a noise impact on properties or justify property-specific noise insulation measures.

Noise levels at neighbouring crossings are forecast not to change due to the Scheme. The Scheme is forecast not to have a noise impact on properties or justify property-specific noise insulation measures.

Noise levels on diversion routes and local roads are not forecast to change due to the Scheme. Insignificant increases in noise (of 2.2db and 1.6db) are forecast respectively on Lower Lea Crossing and Aspen Way. Insignificant decreases in noise (of 2.5db and 1db) are forecast respectively on Abbott Road and the A13 East India Dock Road. The Scheme is not expected to produce any noise impact on properties or justify property-specific noise insulation measures.

Young children, some disabled people, and pregnant people may be more sensitive to noise pollution. People on low incomes and Black, Asian and minority ethnic people may live in areas where noise pollution resulting from vehicular traffic is greater. However, there is no disproportionate or differential impact identified on people due to noise resulting from the Scheme and the impact considered to be neutral.

8.6 Road Safety

8.6.1 Introduction

Changes in traffic volume and patterns as a result of the proposed user charges may impact road safety. Vulnerable populations and equalities groups may be particularly impacted by changes in road safety. Furthermore, some people may switch modes, increasing their use of active travel modes for part of or all of their journey.

People from more deprived areas, some ethnic minorities, disabled people, children and older people are disproportionately affected by road danger in London.⁷⁸

As demonstrated in the baseline, walking is the most common mode of travel for all Londoners, whilst cycling is a popular mode of travel for young people below the age of 15.

8.6.2 Summary

Table 50 summarises the overall equality impacts of the proposed user charges on Road Safety.

Table 50: Road Safety Summary

Summary	People from more deprived areas, some ethnic minorities, disabled people, children and older people are disproportionately affected by road danger in London. However, no impacts on road safety due to changes in traffic levels and speeds on local roads resulting from the scheme have been identified.
Overall rating of impact	Neutral
Overall Impacts identified for protected characteristic and disadvantaged groups	N/a
Mitigations required	N/a

8.6.3 Assessment

The UCAF concludes that traffic flow and composition is not forecast to change significantly on local roads because of the Scheme.

The volume of traffic (measured in terms of total daily vehicle-kilometres) in Greenwich, Tower Hamlets and Newham is forecast to decrease in all time periods, with the exception of Tower Hamlets in the evening peak (an increase of three per cent) and Newham in the morning peak (an increase of less than one per cent). These increases mostly occur on strategic routes (for example the A12) that are forecast to become more attractive to drivers due to a reduction in congestion on the Blackwall Tunnel approaches.

⁷⁸ [TfL \(July 2018\), Vision Zero Action Plan](#)

Traffic on some local roads such as Chrisp Street, Manor Road and Abbott Road is conversely forecast to decrease. In most time periods there is little change in the average speed of traffic, with the exception of an increase from 21kph to 24kph in the morning peak in Greenwich and an increase from 17kph to 19kph in the evening peak in Tower Hamlets. As with the changes in traffic flow, this is primarily caused by improved conditions on strategic routes in these boroughs linked to a reduction in queuing on the Blackwall Tunnel approaches.

People from more deprived areas, some ethnic minorities, disabled people, children and older people are disproportionately affected by road danger. However, no impacts on road safety due to changes in traffic levels on local roads resultant of the scheme have been identified.

8.7 Social Capital

8.7.1 Introduction

Changes to social capital (defined as including social links, networks, participation and satisfaction with living in an area) as a result of the proposed user charges may result from severance as well as changes to the amenity of the area for local residents (for example from changes in noise and air quality).

Some networks extend over the river, whether for the purposes of visiting family and friends, for shopping or leisure and recreation. The Silvertown Tunnel provides a new link across the Thames improving connectivity to north and south of the River Thames in east London and giving access to a wider catchment of services and facilities including education, retail, leisure, healthcare, places of worship and open space.

8.7.2 Summary

Table 51 summarises the overall equality impacts of the proposed user charges on Social Capital.

Table 51: Social Capital Summary

Summary	People on low incomes may experience a differential impact as a result of a reduced ability to afford the user charges and associated change in travel patterns and social networks created. However, the various discounts and exemptions proposed alongside support measure provided through the green and fair package of concessions and discounts help to ensure social capital is not negatively impacted due to the proposed user charges, when factored alongside the improvements to cross-river journey times. The improvements to bus journey times and introduction of new services are also considered to help ensure there are no disproportionate or differential negative impacts on social capital. This helps to ensure protected characteristic and disadvantaged groups are not lawfully discriminated against,
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	<p>advance equality of opportunity, and help to foster good relations between people.</p> <p>There is a risk that the user charge could have a negative impact on carers and the provision of care cross-river by informal, voluntary, paid care workers and PAs. Whilst we believe that our proposed support options help to mitigate these potential impacts from occurring, it is important that we monitor whether any negative impacts arise and explore options to mitigate these in line with Policy 15 of the CPAP.</p> <p>No overall significant changes to amenity for local residents due to changes in traffic levels leading to significant changes in noise and air quality, or severance are anticipated.</p> <p>It is considered that due regard has been given to Section 149(1) of the Equality Act 2010, and no overall disproportionate or differential impacts on social capital have been identified for protected characteristic and disadvantaged groups.</p>
Overall rating of impact	Neutral
Overall Impacts identified for protected characteristic and disadvantaged groups	N/a
Mitigations required	N/a

8.7.3 Assessment

The proposed user charges have been developed to ensure that journey times are improved cross-river and that negative impacts of induced demand do not occur. They aim to encourage people who are able to do so to re-route their journey, re-mode to alternative active or sustainable modes, or re-time their journey to out of peak periods. However, consideration has also been given to ensuring that they do not act as a barrier to travel for people requiring use of the tunnel, and do not lead to negative socio-economic outcomes. These factors have been assessed through the UCAF.

It is considered that people are likely to continue to make cross-river journeys to access social links and networks, despite the user charge. Shifts in travel patterns and behaviour may occur, for example during off-peak periods or shifting to the bus network, which is improved through new and improved routes benefitting from reduced journey times and

service reliability, with a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

As highlighted in Section 8.2.6, there is a risk that the user charges may lead to a potential impact on access to work and training for carers (voluntary, paid, informal and PAs) and care providers providing services cross-river. If this impact were to affect the provision of care, it could lead to negative impacts on social capital for people who may be reliant on care including social links, networks, participation, and satisfaction with living in an area for disabled people and older people.

Whilst we believe that our proposed discounts and exemptions will help to mitigate negative impacts on the provision of care whilst ensuring we achieve our project objectives, it is important that we monitor how the scheme is affecting cross-river care provision and ensure we seek to address these impacts should they have a negative impact on protected characteristic and disadvantaged groups. In line with Policy 15 of the CPAP, we will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening.

Additionally, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended that we provide targeted communications to carers to raise awareness of the discounts and exemptions they or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan.

People on low incomes may experience a differential impact as a result of a reduced ability to afford the user charges and associated change in travel patterns and social networks created. However, the provision of new and improved bus routes through the tunnel together with improvements to journey times and reliability will help to offset this. Furthermore, the east London low-income residents' discount has been proposed, helping to further offset the impact.

As part of the green and fair package of concessions and discounts we are also providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London. This includes free cross-river bus journeys to support local residents, free DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V to support local residents and a cross-river cycle shuttle-bus, free for at least 12 months. The bus and DLR concessions proposed as part of the green and fair package of concessions and discounts could have a greater positive impact for people on low incomes, whose most common mode of travel in London is bus, compared to people not on low incomes.

The UCAF has concluded that the Scheme is not forecast to cause any significant impacts on air quality and noise on local roads, and it is therefore considered that the Scheme will not lead to a negative impact on amenity for protected characteristic and disadvantaged groups.

As demonstrated in the UCAF, the proposed user charges are not anticipated to lead to significant increases in traffic levels leading to severance which impacts protected characteristic and disadvantaged groups. Furthermore, cross-river severance is considered to be improved due to the improvements in connectivity resultant of the

improved journey times when travelling through the tunnels by all modes able to use the tunnels, and the location of the northern portal of Silvertown Tunnel providing direct access to the Royal Docks. This includes the new and improved bus routes which will benefit from the reductions in congestion.

The discounts and exemptions provided as part of the scheme as shown in Table 3 help to minimise the impact on social capital resultant of severance caused by the proposed user charges.

There is a risk that social capital may be negatively impacted for disabled people and older people if a negative impact on cross-river care were to arise. Whilst we believe our proposals will not lead to a negative impact on the provision of care cross-river, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended that we provide targeted communications to carers to raise awareness of the discounts and exemptions they or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan. We will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening.

The impact of the proposed user charges on social capital is neutral. The proposed charge levels, alongside the proposed discounts and exemptions and improvements to cross-river connectivity, journey times and reliability help to ensure protected characteristic and disadvantaged groups are not lawfully discriminated against, advance equality of opportunity, and help to foster good relations between people who share a protected characteristic and those who do not.

9 Monitoring and Evaluation

It is a requirement of the DCO that we monitor the impacts of the proposed user charges in line with the Monitoring and Mitigation Strategy following the opening of the Silvertown Tunnel.

If it is discovered during this monitoring that the proposed user charges are not supporting the scheme to achieve against the Project Objectives, we will review and vary the proposed user charges to ensure they allow for the Project Objectives to be achieved.

In line with Policy 15 of the CPAP, we will review our user charges no later than 15 months after the Silvertown Tunnel opens, and make changes to the user charges where this is required for us to meet our Project Objectives or to mitigate any negative impacts on protected characteristic or disadvantaged groups. Any amendments to the proposed user charges will be subject to assessment of impacts via the UCAF and a further EqIA to ensure that the changes either mitigate against, or do not lead to, disproportionate or differential negative impacts on Protected characteristic and disadvantaged Groups in line with the PSED of the Equality Act 2010.

10 Conclusion

Overall, the impacts which have been identified in this assessment are considered to be minor requiring no further mitigations, or mitigated through the proposed discounts, exemptions and concessions proposed.

A potential disproportionate negative impact has been identified for PHV drivers on low incomes who do not own a ZEC or wheelchair accessible PHV. Due to the demographics of drivers in the PHV industry, this could have a potential secondary disproportionate impact on people of Asian ethnicity and Muslims. However, this impact is expected to diminish over time as vehicles are upgraded to ZEC vehicles to meet licensing requirements.

There is a risk that the user charges may impact on access to work and training for carers (voluntary, paid, informal and PAs) and care providers providing services cross-river. If this impact were to affect the provision of care, it could lead to negative impacts on social capital for people who may be reliant on care including social links, networks, participation, and satisfaction with living in an area for disabled people and older people. Changes to the provision of care by the voluntary and charitable sectors could negatively impact disabled people, older people, homeless people, and asylum seekers and refugees.

The proposed discounts and exemptions will help to mitigate negative impacts on the provision of care whilst ensuring we achieve our project objectives; however, it is important that we monitor how the scheme is affecting cross-river care provision and ensure we seek to address these impacts should they have a negative impact on protected characteristic and disadvantaged groups. In line with Policy 15 of the CPAP, we will ensure that any impacts on cross-river care provision are examined as part of our review of the user charges after opening.

Additionally, to help ensure that as many carers, care organisations and charities are aware of the discounts they may be entitled to, it is recommended that we provide targeted communications to carers to raise awareness of the discounts and exemptions they or their clients may be entitled to as well as the benefits of signing up for Auto Pay as part of our marketing plan. The marketing plan is being prepared at the time of writing of this document and is intended to be launched in early 2025 subject to approval of the proposed user charges by the TfL Board.

People on low incomes may disproportionately experience a reduced ability to afford the user charges and associated change in travel patterns and social networks created. However, the east London low-income residents' discount has been proposed, helping to offset the impact.

Further mitigations provided as part of the Scheme which help to offset potential negative impacts include the improvements to the bus network through improved journey times on existing routes and two new cross-river routes, with a total of 21 zero-emission buses (at the tailpipe) per hour crossing the river at peak times including Superloop bus route SL4.

As part of the green and fair package of concessions and discounts we are also providing concessions on public transport for at least 12 months following Scheme opening to help support people switching to public transport for cross-river journeys in southeast London.

This includes bus concessions for free cross-river bus journeys to support local residents, a free cross-river cycle shuttle-bus and free DLR journeys (refunded) between Cutty Sark – Island Gardens and Woolwich Arsenal – King George V. Additionally, for at least 12 months following Scheme opening small businesses, sole traders and charities in host boroughs will benefit from a £1 discount on the standard off-peak charges (subject to eligibility). Furthermore, TfL assisted travel and travel mentoring programmes and standard concessions on buses and public transport usage for certain groups help to ensure that alternative modes are as accessible as possible.

It is considered that the proposed user charges (including the discounts and exemptions) have been developed with due regard for the impact on protected characteristic groups, and we have satisfied our obligations under Section 149(1) of the Equality Act 2010 in developing the proposals.