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Transport for London
'HAVE YOUR SAY'
Silvertown and Blackwall tunnels user charge

By email to: TC-yourview@tfl.gov.uk

30th August 2024

Dear madam or sir,

The Royal Borough's response to Transport for London's consultation on its Silvertown and Blackwall tunnels user charge

Thank you for giving us the opportunity to feed in to the consultation regarding the charge level proposal structure. We have been engaging and will continue to engage with officers at Transport for London regarding this matter also.

Whilst we are mindful of the current cost of living crisis and the impact it may have on businesses and residents, whilst addressing both TfL and RBG's medium to long term objectives, for our Transport Strategies, we need to make sure that there is a fine balance met.

Firstly outside of the tolling consultation, we would like to state our position to request at least two (of the four) bores to be repurposed for sustainable transport as this would best meet the Mayor of London's climate change, traffic reduction, air quality and public health targets. It would also not increase capacity for vehicles and thus ease the flow especially southbound (which otherwise is reduced from 4 lanes to 2 lanes).

If this is not a possible future consideration, then a clear set objective that tolls are set at a level that will reduce traffic by 25% from current levels as per the Mayor's Transport strategy is needed. The Royal Borough of Greenwich's Carbon Neutral Plan is objecting to reduce car traffic by 45% by 2030 and the tunnels are a key artery and contribute to our means of ensuring we achieve our target to be Net Zero.

Overarching issues: level of charge

In principle there may be a view that this tolling structure does not align with the Mayors Transport Strategy, especially around the lack of parity with sustainable modes vs cars (especially after the bus subsidy period and uncertainty regarding the cycle-shuttle).

Having received modelling from TfL, we can see that the modelling suggests that +20% charge leads to rerouting in borough, to seek alternative crossings and reduced charges lead to significant flow increases across the board. We would not support increases above 20% of these based on evidence presented. However, these are very sensitive to modelling assumptions, and will need to be monitored closely.



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Given the +/- 20% changes, which we are aware of, Car toll charges should be more than a normal bus fare and at a rate above £1.50 which is too low making it cheaper than a bus fare of £1.75.

In our view HGVs should be tolled 24 hours per day at least £10 a time and possibly more at peak - reducing HGV traffic into Greenwich and promoting a modal shift of freight to river and rail must be a key objective of any tolling regime.

Discounts and exemptions

Overall there is a lack of clarity re: how long measures will last and how they will be evaluated and managed after monitoring period(s).

Royal Borough supports exemptions for NHS workers, licensed TfL taxis, emergency vehicles and blue badge holders

In our view only local residents (three Boroughs of Greenwich, Newham and Tower Hamlets not the 13 Boroughs) on low incomes should be included in the exemptions, and also going one step further, only if they can demonstrate that their car use is essential and they cannot use public transport (eg those transporting equipment, some carers and very few night time workers). Is there a way that the low Income discount must be limited to essential users otherwise it will actually encourage negative modal shift. Has this been modelled?

Overall our view is that we should mirror toll charge exemptions for local residents and businesses, at nearby tolls, such as Dartford Bridge, where there is a Local resident discount.

Residents would apply for a discount if they pay council tax to Newham Council or Royal Borough of Greenwich respectively.

It is not clear as to what the length of discount will be for local residents and businesses, but our view is that it should be indefinite going forward.

Low income residents

Whilst we appreciate the need to balance managing travel demand and support for low income residents, to assess whether the right balance has been found it would be helpful to see your assessments of different discount levels and eligibilities.

- 6% of all traffic is low income from the discount area vs 4% in host boroughs (as per DCO requirement), so expanding area = big benefit for small traffic impact.
- Officers have looked at the % discount impact: had a greater impact and encourages people with more local trips to drive. So benefits more people / avoids impacts.
- We could argue for a greater local discount as greatest adaption, with limited affects on more distant boroughs? However maintaining the level of charges or a local bus fare, but also offsetting the financial impact on residents outside of the boundary of residents
- How will the future of the discount be considered at the end of the monitoring period?

Business discount

Again, whilst we appreciate the need to balance managing travel demand and support for businesses, to assess whether the right balance has been found it would be helpful to see your assessments of different discount levels and eligibilities.

Business users relatively inelastic, the discount didn't have any highway mitigation impacts and was relatively affordable (but already significantly more than their previous £1m budget). Can you share your traffic impact re a larger discount.

How will the future of the discount be considered at the end of the 12 month minimum period?

Royal Borough feels that we should be more selective on potential discounts that should only apply to local businesses in the three Boroughs with essential travel needs (carrying heavy equipment etc.)

Specific traffic / other impacts

Woolwich Ferry

The total number of daily cross-river vehicle trips is forecast to decrease by one per cent (-39 trips in total) - daily HGV trips are forecast to increase by two per cent, 15 additional vehicles."

HGV flows show a slight growth but broadly show a reduction, and although data shows that it is unlikely to be a significant issue numerically but small numbers of HGVs can have very high impacts on this sensitive corridor.

Transport for London would need to be monitor closely and considered in TFL's management of issues at the ferry.

In other cases, journey times are forecast to increase (for example, the A2 eastbound from New Cross to Sun-in-the-Sands and the A206/A200 westbound from the A102 to Rotherhithe in the PM peak) albeit these increases do not exceed two minutes in any time period with the Scheme in place."

Could TFL share appraisal table outputs for these routes.

Whilst not a DCO requirement, there has been significant interest in particulate matter (PM10 and PM2.5). Has TfL made any forecasts of this (albeit they may be for information outside the formal monitoring framework etc.

TfL have previously held line of not doing PMs as not scoped, however it is disappointing that TfL have not sought to reassure people, given the clear concerns raised by community in the area.

TfL's Project Objective 7: is to achieve value for money and, through road user charging, to manage congestion

Whilst it is a secondary function of the charge, to properly understand the balance achieved by the proposed charge, it would be useful to understand your forecasts of how effective the charge will be at meeting the costs of the Tunnel and over what time period.

Whilst I appreciate it is unlikely you would be able to share the data but revenue generation is secondary to achieving the project objectives, which the proposed charges are shown by the analysis above to only just achieves – so won't be generating excessive revenue.

Some of your assumptions in the marketing material for the consultation, eg that the tunnels will reduce congestion may be disproportionately taken as red, especially when TfL's own evidence to the Public Inquiry was clear that there would be a significant impact southbound in the afternoon peak, and overall, be neutral (not reduce congestion) and is also caveated by the monitoring strategy/plan in place as part of the DCO.

Yours sincerely,

Cllr Lekau