

Response to consultation on Silvertown and Blackwall tunnels user charges

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Introduction and background

I am responding to the [consultation on the Silvertown and Blackwall tunnels user charges](#), as I am sure is well understood the current approach to use and operation of the Silvertown Road Tunnel as an extra road that will induce new traffic has never been supported by the City Hall Greens at any stage.

We have repeatedly [raised concerns about the impact of increased traffic](#), [urged the Mayor to cancel or change the project](#), and [do not believe that the proposed approach](#) even with tolling (road user charging) of Blackwall and Silvertown Tunnels will be effective in meeting the Mayor's Transport Strategy (MTS) targets and Net-Zero 2030 goals.

It is important given that the MTS sets targets for Transport for London (TfL) to deliver, that there are regular reviews of the outcomes of the investment and operation of the Silvertown Road Tunnel, and of the need for further transport investment in public transport, walking and cycling in east and south east London.

I am aware that campaigners are raising London-wide issues that need more strategic thought including the way in which all Thames crossings are managed. It is important that each review of the outcomes from bringing the Silvertown Road Tunnel into use includes information that can inform thinking about traffic reduction and modal shift at other river crossings in London.

City Hall Greens welcome that a form of road user charging is being implemented, and that some basic principles of a smarter approach to road user charging are to be used, in particular, charges varying by time of day, and by type of vehicle. The wider MTS still supports the development of smart, fair privacy friendly road user charging, and the new systems TfL has put in place to support the new road tunnel charges should be used to inform and help develop future, smarter versions of road user charging.

The public transport, walking and cycling proposals alongside this road tunnel are not in keeping with the scale of investment that has been made in new motor traffic infrastructure. Not a single new bus stop has even been delivered within the new Silvertown Road Tunnel link and its connections, and it will be a long-term policy failure that walking and cycling in the tunnel, and the lack of reliable walking and cycling connections over the Thames were never properly considered in the planning stages.

I believe that it is a mistake that the “green fair package” launching alongside the new Silvertown Road Tunnel is not a formal part of this consultation. Most elements of the “green fair package” should be planned for as a permanent arrangement, and Londoners must be properly consulted on any changes.

There is a risk that discounts and exemptions applied locally are being used as an alternative to fixing long-standing issues with public transport, walking and cycling connectivity in east and south east London. TfL must make full use of the public transport potential through these tunnels, ensuring services are always quick, convenient, and affordable.

Operational aspects that remain unclear

Outside of the scope of this consultation there are aspects of the operation of the overall proposals for the Silvertown Road Tunnel, as part of the “green fair package” that need clarification.

For the cross-river cycle shuttle-bus, it is unclear what levels of demand TfL are planning for, and how any tidal flows might be accommodated. Before the launch of the service TfL should make clear more detail on the modelling behind the service, assumptions on upper and lower levels of demand, the service pattern and how it will be ensured that nobody using the service believes that using a private car (should they have one) instead is a better alternative. In addition, the exact approach taken to enable cycles used as mobility aids to be carried and used to board the service, and to enable laden cargo bikes to access it needs to be made clear, along with the nature and location of boarding and alighting points. It is notable that no infrastructure that could support the service of buses for the cycle shuttle has seemed to be delivered as part of the main Silvertown Road Tunnel contract.

For the cross-river bus services, it is important that there is more information provided before launch on the expected service pattern, and its development from demand modelling. This modelling should also be clear about how the bus service has been designed to ensure that it is not slower than the alternative of using a private car.

For the DLR cross-river journeys that would be refunded after use it is not clear how this will be advertised, how long refunds would take, if all TfL payment systems are compatible and whether this use of the DLR would be promoted in journey planners particularly to link with other modes such as using buses either side of the river.

Response to specific consultation questions

I note this consultation is on the discounts, exemptions, and reimbursements in the proposed charging scheme, so the following comments relate directly to these proposals:

50% discount

While the aim to protect low-income Londoners living in boroughs either side of Silvertown and Blackwall Tunnels from an additional cost to driving is welcome, it is important that any adverse impact of discounts on the MTS targets for traffic reduction and journeys made by walking cycling and public transport is quantified and minimised.

For example, the 50% discount for low-income residents should not make it cheaper to drive through the tunnel than to catch the bus. It also begs the question why low-income Londoners who drive cars are getting discounts rather than low-income Londoners who catch buses, especially as tolling is intended to reduce congestion related to the new road capacity created by the Silvertown Road Tunnel and catching the bus is a more efficient use of road space.

100% discount

The list of categories for 100% discount seem sensible, but I have a query about blue badge holders. There is a long-standing problem in all schemes that blue badges are allocated to a person, but not specific vehicles. There are a number of different ways schemes that provide discounts and exemptions to blue badge holders' vehicles are implemented.

Many Blue Badge holders are reliant on friends and family for help to attend medical appointments, get to work or the shops, or to visit family and friends. This means it is likely they will have to change the vehicles they have registered to go through the tunnels regularly, for example when a carer changes, or a different carer is sent by a provider. There needs to be a more flexible scheme and a recognition that a limit of two permanently registered vehicles may not meet people's needs.

There should be a way for a vehicle to be registered for a short, defined time period – say by the day - so different people can support someone with a blue badge, reflecting the reality of the patchwork of support that many blue badge holders rely on.

Could there be a system centered on the blue badge holder where there is an option for a vehicle to be registered short-term for a specific date? That way the blue badge holder can register long-term one car that they are supported by most of the time and also have an option to register different cars short-term for particular dates depending on who is volunteering to support the blue badge holder on each day.

£1 business discount on standard off-peak charges

As with the discount for low-income residents, there should be more thought about the potential adverse impacts of this discount, and how it may impact development of some forms of business locally. There needs to be a full review of the impact of this discount at twelve months and consideration of what transport measures, beyond discounts are needed in the local area.

I am concerned that the “green fair package” cannot, by virtue of the way tunnel and the bike shuttle will operate, provide a full set of transport options for local businesses. In particular loaded cargo bikes may not find the cross-river cycle shuttle-bus an effective option for crossing the river with light freight.

Exemptions and reimbursements

The exemptions and reimbursements proposed seem sensible, though as with the blue badge discounts, there is a need to consider what simple and easy to use systems can be in place to make them work well – particularly for the NHS reimbursements.

Review and future plans

The impact on the MTS targets and policies of all the elements proposed in this consultation, and the wider “green fair package” should be regularly reviewed after implementation.

There is already a requirement to produce some monitoring under the Development Consent Order (DCO), but TfL should ensure it does more than the bare minimum in reporting. This should include clear statistics and guidance on impacts in a similar approach to the reports after the implementation of each stage of the Ultra Low Emission Zone. And as with reporting on the Elizabeth Line, changes in modes used should be tracked.

TfL should give Londoners a chance to share their views on the impacts of the Silvertown Road Tunnel itself, tunnel charges, and the wider package of changes including the “green fair package” as part of each review.

Neither the Equality Impact Assessment nor User Charge Assessment Framework give enough consideration to risks to people walking and cycling. Green AMs have repeatedly raised concerns about the walking and cycling elements of this scheme and its impact in the wider area. I remain concerned about the quality of provision for people to walk, wheel and cycle.

This is especially worrying because local campaigners have had to resort to freedom of information requests to access basic information on road layouts. I hope you will ensure that facilities delivered are not just in line with your contract, but also with current TfL and Government design standards.

The cross-river cycle shuttle-bus is a novel service which will need very careful ongoing review covering:

- how promotion and information support the service.
- impacts of operational challenges like waiting times, loading cycles, and peaks in demand.
- practical responses to other challenges like accommodating laden cargo bikes and cycles used as mobility aids.

The User Charge Assessment Framework assumes a major positive change for public transport from a reduction in disruption to the 108 bus and new opportunities from the two new bus routes in the Silvertown Road Tunnel (129 & SL4). Ongoing monitoring needs to assess if these services create a genuine and a meaningful improvement to public transport in the area.

Reporting on the bus services needs to include context from existing cross-river public transport routes (Jubilee Line, Elizabeth Line and both DLR routes) and the new free cross-river trips on the DLR.

The Equality Impact Assessment notes car ownership levels in the host boroughs are below the London average (36%) with Greenwich just below (35%), Newham (24%) and Tower Hamlets (19%) substantially below. Future reviews should use not only borough wide but also more local geographic data on car ownership levels to understand the impact of the tunnel, tunnel charges and the “green and fair” package.

There should be more research into journeys made through the tunnel by car for which the alternatives (cycling and public transport) are slower, more expensive, or not always available. This would help the planning of public transport, along with investment in new walking and cycling links to provide alternatives to driving.

Given that public transport fares generally increase annually with inflation the road user charges should also track inflation. Annual reviews should track the relative time and cost of driving and public transport for journeys made across the river in east and south east London to help meet the MTS targets for traffic reduction and modal shift.

All the ideas above will improve reporting on the outcomes of the tunnel and reflect the many challenges for transport in east and south east London that need to be solved if the Mayor is to meet the MTS and net-zero targets.

As the [current Mayor has said](#), “I am sure we and our successors will continue to discuss how best to develop the Silvertown and Blackwall Tunnels, including the user charge and bus services over the next 100 years”. There is clearly still scope for the use of the tunnels to change in future, considering that Blackwall was originally designed for walking, cycling, horses and barrows.

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