

SILVERTOWN AND BLACKWALL TUNNELS USER CHARGE

CONSULTATION RESPONSE

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INTRODUCTION

We welcome the opportunity to respond to TfL's consultation on the proposed charges, discounts and exemptions for the Silvertown and Blackwall tunnels.

BusinessLDN is a business membership organisation with the mission to make London the best city in the world in which to do business, working with and for the whole UK. We represent 170 large leading businesses across London, spanning a wide range of economic sectors.

TfL's proposed scheme would be the first application of dynamic pricing in London with distinct peak and off-peak charges, in contrast to the single flat Congestion Charge rate. As outlined in our Mayoral [manifesto](#), the Mayor should explore the potential for an integrated, congestion-reducing road pricing system.

Such a system could replace current congestion and ultra-low emissions zone charges where it makes environmental and economic sense. There must be a way of **simplifying the existing road charging regime** to avoid paying four separate charges, the Congestion Charge, the ULEZ, the LEZ and the tolls in the Silvertown and Blackwall Tunnels.

DETAILED COMMENTS

Improving connectivity and supporting economic growth in the area

1. There is a **marked shortage of highway river crossings in east London** compared to the western part of the capital, with only three crossings of the Thames located east of Tower Bridge. As such, the development of new river crossings such as the under-construction Silvertown Tunnel is critical to meeting the ever-growing connectivity demands of the capital.
2. Currently the cross-river road network in east and southeast London has poor resilience with no suitable alternative crossings in the area. This has significant adverse effects on travel, the economy and the environment across the area. The Silvertown Tunnel will **improve the resilience of the river crossings** in the highway network enabling it to better cope with planned and unforeseen incidents.
3. The new tunnel is expected to **support economic and population growth** in the area by providing much-needed improvements to cross-river transport links. If successfully implemented, the scheme can also help ease congestion in the area around the

Blackwall Tunnel, facilitating more efficient journeys. The Silvertown Tunnel will improve people's access to jobs, services and leisure, while enhancing connectivity between businesses and their customers and suppliers. The anticipated reductions in vehicle journey times and improvements in journey time reliability at the Blackwall Tunnel are expected to deliver substantial economic benefits for businesses.

Ensuring that London's road congestion is adequately managed

4. User charging is a requirement of the Development Consent Order (DCO) for the Silvertown Tunnel with the revenue supporting the costs of the construction, on-going maintenance, and operation of the Silvertown Tunnel. Information should, however, be provided about **whether the charging scheme will cease** once the associated costs have been recovered.
5. We also appreciate that without introducing charges to the tunnels, there is a **risk that traffic could potentially increase** which would translate to further delays and air pollution. If managed effectively, introducing a user charge could reduce congestion by encouraging more efficient road usage and increased use of public transport.
6. The likelihood of the proposals leading to some **traffic diverting towards more central river crossings** such as the Rotherhithe Tunnel or Tower Bridge should be carefully considered. According to TfL's User Charging Assessment Framework, total vehicle trips through Rotherhithe tunnel are forecast to increase by four per cent while HGV trips across Tower Bridge are expected to increase by six per cent further.
7. It is also important that a **comprehensive public awareness campaign** is launched to ensure businesses and the wider community are informed about the scheme's details well in advance of the Silvertown Tunnel's opening. Furthermore, as London's population is projected to exceed 10 million people by 2040, it is crucial that its transport infrastructure and schemes remain adaptable. A thorough monitoring system should be implemented, enabling frequent review of the scheme (preferably every 6 months) so that adjustments such as changes to charge levels or discounts can be made if necessary.

A balanced approach which incorporates both incentives and deterrents is required

8. Businesses that frequently rely on the Blackwall Tunnel, including freight and delivery companies, private hire vehicle operators and river services will experience higher operational costs. Given the substantial level of the proposed charges and the narrow profit margins typically associated with these industries, these **costs may ultimately be passed on to customers** in the form of increased prices. Proposals should be therefore reviewed to factor the essential services provided by these sectors.
9. The Blackwall Tunnel suffers from recurring congestion and frequent traffic incidents, resulting in hundreds of closures annually and considerable loss of time and resources. Often major closures result in traffic chaos in the area "**as there are no suitable alternative river crossings available**" as acknowledge by TfL in the FAQs section of the consultation.
10. While we believe a **balanced approach that incorporates both incentives and deterrents** is necessary to promote more sustainable travel patterns, the lack of viable alternative solutions in east and southeast London presents a major challenge for businesses and individuals – this issue requires further consideration from TfL.

The need for a broader review of London's charging regime

11. In terms of discounts, **consideration should be given to businesses operating in the vicinity** of the tunnels as they are likely to be disproportionately affected by the introduction of charges. Employees commuting across the two tunnels should benefit from discounts to the charge.
12. In the long term, **a broader review of the capital's charging regime**, including Congestion Charge, should be carried out by TfL to take into account the trip purpose, support businesses' fleet decarbonisation plan and simplify the system in its entirety.