

No to Silvertown Tunnel [SILV-227]

Deadline 5 Written Representation to the Planning Inspectorate

20th March 2017

Charging Policy: Mayoral Review

We have reviewed in particular the revised Charging Policy and Procedures (REP4-039) and Transport for London's Response to Action Points 6, 7, and 8.1 titled 'Managing Uncertainty in Forecasting' (REP3-027).

1. We note that Transport for London has been discussing the potential for discounts on the charges for residents of the host boroughs with the local authorities.¹
 - 1.1. We believe the offer of 50% discounts on charges for people in receipt of Income Support, Jobseekers' Allowance or Employment and Support Allowance puts at risk TfL's ability to manage congestion through user charges. Furthermore, these discounts risk increasing congestion along routes such as the A206 in the Royal Borough of Greenwich, passing through areas where few residents will benefit from the discounts: Woolwich Riverside ward has a household-vehicle access rate of 52.3%, Peninsula - where the Scheme is located - has a household-vehicle access rate of 61.6%².
 - 1.2. It is also likely to bring calls for discounts for other nearby boroughs, which will further undermine TfL's ability to control congestion and subject user charging to further political pressure. To use more examples from south of the river, locations in the London Borough of Lewisham such as the Crossfields Estate in Deptford and Ryculf Square in Blackheath will miss out on discounts, as will locations in the London Borough of Hackney close to Victoria Park and Hackney Wick, despite being much closer to the Scheme than areas of the Host Boroughs that would benefit.
2. We respect TfL's argument that its modelling has been carried out in accordance with WebTAG best practice, as it argues in the Response to Action Points 6, 7, and 8.1.
 - 2.1. But we would however highlight its statement at 3.3.9 that "that charges have only been selected on an intuitive basis at this stage, and have not yet been fully optimised by iteratively changing charges until Assessed Case flows result". If the charging level used to test the model is 'intuitive', and as the traffic modelling hangs on the charges, then this would suggest the possibility of greater uncertainty than TfL recognise.
 - 2.2. Therefore we hold to our earlier comments on the inherent risks of the scheme.

¹ London Borough of Newham, Responses to Second Written Questions, Issue Tracker p.1 (REP4-012).

² www.royalgreenwich.gov.uk/download/downloads/id/2642/car_and_van_availability