

30 August 2024

TfL Have Your Say

Dear Transport for London consultation team,

I am writing to you on behalf of the London Chamber of Commerce and Industry (LCCI), London's largest independent business community representing over 8,900 businesses. As the voice of London's business community, we advocate for policies that support the city's economic growth.

We welcome the Mayor of London's delivery of the Silvertown Tunnel, a much-needed addition to East London's transport infrastructure. However, we have concerns regarding the proposed toll rates, particularly for larger vehicles such as vans and heavy goods vehicles (HGVs).

While we understand the need to reduce pollution and congestion, we believe the proposed rates for larger vehicles are disproportionately high. These vehicles are essential for London's logistics industry, which plays a critical role in the city's economy.

LCCI recognises the Mayor and the Greater London Authority's aims to reduce pollution and congestion in London, which have been cited as key reasons for the introduction of tolls for the new Silvertown Tunnel and existing Blackwall Tunnel. The proposed discounts for small businesses and low-income East Londoners are vital to ensuring the rates do not unfairly hit those least able to afford the tolls.

However, we and our members have expressed concerns at some of the rates that have been proposed by Transport for London (TfL). In particular, the rates for drivers of large vans and heavy goods vehicles (HGVs) are significantly higher than those for car or small van users. These bigger vehicles are mostly likely to be used by companies in the freight and logistics industries, which play a critical role in London's economy. Without logistics firms to move goods around the city, London's economy would grind to a halt. The proposed tariffs for HGVs and large vans at peak times in particular would represent a significant cost to companies.

Using larger vehicles enables businesses to move greater volumes of goods in fewer vehicles, and implementing different rates may incentivise a shift to using additional smaller vehicles.

LCCI is also concerned at the disparity between the proposed rates for the Silvertown and Blackwall tunnels, and the existing charges for the Dartford Crossing. By utilising different charging rates, there again may be an effect of pushing traffic to outer London areas where the crossing is more cost-effective.

Recommendations

- **Lower the proposed toll rates for all vehicles to match those of the Dartford Crossing. This would prevent traffic from shifting to outer London areas.**
- **Reduce the toll rates for HGVs and large vans. This would alleviate the financial burden on businesses in the logistics industry and help to ensure the efficient movement of goods.**

By implementing these recommendations, TfL can help to balance the need for revenue with the importance of supporting London's businesses.

It is LCCI's view that all of the charges for the Silvertown and Blackwall tunnels should be lowered and mirror those of the Dartford Crossing. This would prevent any kind of disparity between the different crossings, and reduce the possibility of traffic shifting further east to pay a lower charge.

TfL should also lower the proposed rates for HGVs and large vans, to those in line with the Dartford Crossing. HGVs and large vans are an important part of London's economy. Firms in the logistics and freight industries rely on these larger vehicles for their operations, and with online deliveries playing an ever-greater role in the lives of Londoners, the ability to shift great quantities of goods around the city has never been more important.

We look forward to continuing our dialogue with TfL on this important issue.

Yours sincerely,

Karim Fatehi MBE

Chief Executive, London Chamber of Commerce and Industry