



Response from the British Motorcyclists Federation (BMF) and the National Motorcyclists Council (NMC) to the Transport For London (TfL) Consultation on plans to charge drivers for using the Blackwall and Silvertown Tunnels

The British Motorcyclists Federation (BMF) welcomes the opportunity to respond to Transport For London's (TfL) consultation on plans to charge drivers for using the Blackwall and Silvertown tunnels. The BMF is also responding to the consultation on behalf of the **National Motorcyclists Council (NMC)** in order to assist TfL in their consideration of the responses from two leading motorcycle organisations. Neither the BMF nor the NMC have any objections to this response being reproduced or attributed.

Summary of BMF/NMC Position

- BMF and NMC strongly object to the proposals put forward by TFL to implement charges for motorcycles to use the Blackwall and Silvertown Tunnels.
- The charging proposals set out by TfL, as well as the evidence and rationale underpinning the proposals, are seriously flawed, demonstrating little, if any, analysis or modelling in respect of motorcycling and its positive impacts on pollution levels and traffic congestion; both purportedly key objectives of the Silvertown Tunnel Scheme.
- The decision to equate motorcycles with cars, with the same fee charged for both except in peak hours, is completely illogical given the stated aims and objectives of the Scheme. The charging proposals are likely to disincentivise less-polluting motorcycle use and see car use through the Tunnels increase as motorcyclists will have little incentive to choose motorcycle use over a car.
- Importantly, the proposals run contrary to TfL's wider transport policies, including the Congestion Charging Zone policy, the Mayor of London's Transport Strategy and TfL's network management duty under the Traffic

Management Act 2004, as they fail to take into account the widely recognised benefits of motorcycle use as a means to reduce pollution and congestion levels and the duty of TfL to ensure their road networks are managed effectively to mitigate congestion and disruption to vehicles and pedestrians.

- The charging proposals also fail to take into account the impact of the proposed charges on motorcyclists' safety and the impact on wider communities around the Tunnels, with motorcyclists disincentivised to use the Tunnels and likely to seek out other routes across the Thames instead.
- Using the term "Bus Lane" to describe the proposed designated lane through the Silvertown Tunnel for larger vehicles, which will include not only buses but also coaches and HGVs, is likely to cause confusion among road users, which in turn may have an adverse effect on Tunnel safety. In principle, the BMF and NMC support motorcycle access to priority measures for buses, which is consistent with wider TfL policy across London.
- The BMF urges TfL to revisit and reconsider their proposals, to carry out proper modelling and analysis around motorcycle use of the Tunnels, and to exempt motorcycles from the charges in order to recognise and realise the significant benefits motorcycling offers as an accessible, affordable, cleaner and greener transport option than most other powered modes of transport; one that can provide a real and sustainable solution to pollution, congestion and traffic management issues across London.

Detail

In formulating this response, the BMF and NMC have considered the documentation provided by TfL in support of the public consultation, as well as additional information provided by TfL officials, in TfL's email dated 2 September 2024, which followed the separate Motorcycle Stakeholder Session held by TfL in August 2024 to discuss the Silvertown and Blackwall Tunnels charging proposals. BMF and NMC are grateful to TfL for agreeing to extend the deadline for responses from BMF and NMC until 10 September to provide adequate time for the additional information provided on behalf of TfL, relating to wider modelling and road safety considerations, to be properly considered and responded to.

In launching the Consultation, TfL has said that "to deliver the benefits of the Silvertown tunnel and cover the construction costs, charges will apply on both the Silvertown and Blackwall tunnels."

The specific objectives of the project have been stated as:

- **PO1:** to improve the resilience of the river crossings in the highway network in east and southeast London to cope with planned and unplanned events and incidents;
- **PO2:** to improve the road network performance of the Blackwall Tunnel and its approach roads;
- **PO3:** to support economic and population growth, in particular in east and southeast London, by providing improved cross-river transport links;
- **PO4:** to integrate with strategic land use policies;
- **PO5:** to minimize any adverse impacts of any proposals on communities, health, safety and the environment;
- **PO6:** to ensure where possible that any proposals are acceptable in principle to key stakeholders, including affected boroughs; and
- **PO7:** to achieve value for money and, through road user charging, to manage congestion

The Silvertown Tunnel Charging Policies and Procedures document, originally issued in April 2017, further sets out the “Objectives of User Charging.” These state that the “primary purpose for the user charges is to manage traffic demand” and in so doing “the other effects of the Scheme can be effectively managed and Project Objectives met (para 2.2.1). A “secondary reason” for the user charge is listed as “to provide a means of helping to pay for the design, construction and operation of the Scheme” (para 2.2.2). Furthermore, at paragraph 2.2.9 it is stated that “the user charges are the principal means by which mitigation of the adverse environmental impacts of the Scheme can be delivered” and that “if not properly managed, traffic can have adverse air quality, noise and other environmental impact. By controlling traffic demand via the user charges, these can be mitigated. The user charges not only control the level of demand but can help to incentivise the use of less-polluting vehicles.”

With regard to some of the key stated policies underpinning the proposed charging strategy:

- **Policy 1:** TfL must impose user charges at Silvertown and Blackwall Tunnels to the extent that it is necessary or expedient to achieve the Project Objectives.
- **Policy 2:** In setting and varying the user charges (including the charge levels, the hours charged, the vehicle charges discounts and exemptions granted and other factors related to user charging), TfL must ensure that they are fair, justified and will not undermine the Project Objectives.
- **Policy 3:** TfL will use its power to set and vary the charges as a means to help fulfil its wider road network management duty under the ‘Traffic Management Act 2004 (TfL’s network management duty under the Traffic

Management Act 2004 requires it to make sure road networks are managed effectively to mitigate congestion and disruption to vehicles and pedestrians)

- **Policy 4:** TfL must set and vary the user charges in accordance with applicable legislation, the MTS and other relevant policies.
- **Policy 8:** Before setting the initial user charges, TfL will update its modelling using up to date inputs and the outputs of this modelling will be used to determine whether any charges to the Assessed Case user charges are required to more effectively deliver the Project objectives.
- **Policy 9:** The extent to which the user charges will assist in achieving the Project Objectives is the primary consideration which TfL will have regard to when setting the initial user charges.
- **Policy 12:** The extent to which the user charges will assist in the continued achievement of the Project Objectives is the primary consideration which TfL will have regard to when reviewing and varying the user charges. In considering whether any proposed variation to the charges will assist the delivery of the Project Objectives, TfL will consider the likely impacts of the proposed variation on traffic, the environment, population, economy and growth and other factors which are relevant to the Project Objectives. TfL will also consider the extent to which the proposed variations assist TfL to comply with its statutory functions and other relevant policies and legislation.

Separately, TfL officials have said: “Without introducing tunnel use charges for the Silvertown and Blackwall tunnels, there would likely be high levels of traffic and congestion, which would lead to detrimental air quality impacts, as well as longer journey times.”

The current proposed charges for motorcycles to use both tunnels are £1.50 standard off peak (which is the same level of charge proposed for a car or small van). At peak traffic times, a £2.50 “peak charge” for motorcycles and £4.00 for cars and small vans will be applied, with higher charges for large vans and heavy goods vehicles at both peak and off-peak times of day.

It is clear from the detailed documentation issued under the public consultation, from additional documentation published in support of the Scheme and from various public statements made by TfL officials, that amongst its stated primary considerations, in deciding to apply charges and charging levels for the use of both tunnels, is the desire of TfL to control traffic demand to mitigate congestion, to minimize and mitigate the adverse environmental impacts of the Scheme, and to minimise detrimental air quality impacts whilst incentivising the use of “less polluting” vehicles.

In considering the stated objectives and aims of the Scheme, and the additional information recently provided to BMF, the Motorcycle Action Group (MAG) and NMC by TfL, BMF and NMC views on the charging proposals are as follows:

- **The proposed charges are illogical and patently unfair**, in direct contradiction of Policy 2 of the charging strategy, which sets out that any charges applied must be fair and justified, as they would result, in some cases, in motorcycles being charged the same fee to use the Tunnels as cars and small vans despite motorcycles providing much lower levels of pollution and a real solution to reducing congestion levels. The proposals and their consequences are also in direct contravention to the stated aims of TfL to “mitigate the adverse environmental impacts of the Scheme”, and to “incentivise the use of less polluting vehicles.” The proposed charges fail to take in to account the fact that motorcycles emit far less CO₂ than cars and other forms of motorised transport, contribute just 0.46% to the UK’s overall domestic transport emissions, and offer an accessible, affordable, cleaner and greener transport option to aid the development of a future, sustainable and integrated transport system for London in support of the wider economic health of the city.
- **The charging proposals are not in line with TfL’s aim under the Scheme to incentivise the use of less-polluting vehicles.** Government data, relating to the carbon footprint of travel per kilometre for different vehicles published by the Department For Energy Security and Net Zero in 2022 sets out a carbon footprint of 171g for diesel cars, 170g for petrol cars and 114g for motorcycles. To charge a motorcycle the same Tunnel charge as a diesel car or van with a carbon footprint 50% greater than a motorcycle is clearly illogical, unfair and contrary to TfL’s stated aims and proposals, as set out in its consultation.
- **The proposals run contrary to TfL’s duty under the Traffic Management Act 2004.** The specific proposal by TfL to charge cleaner, low (and increasingly zero carbon-emitting) powered two-wheelers such as motorcycles in some cases the same as cars and small vans, also fails to recognise the real solution motorcycles offer to reducing congestion, and associated pollution issues within London; benefits which have separately been recognised in the application of London’s congestion charges. The proposals also fly in the face of TfL’s network management duty under the Traffic Management Act 2004, which specifically requires TfL to make sure road networks are “managed effectively to mitigate congestion and disruption to vehicles and pedestrians.” Motorcycles are widely accepted and recognised as providing significant benefits in towns and cities to greatly reduce traffic congestion. Motorcycles also cause less road wear than cars, with the associated highway repair costs to Local Authorities, and take up less road space and parking space than other vehicles; all factors that should have been taken into account by TfL in formulating the proposed charging policies in line with their network management duty under the Traffic Management Act 2004.

- **The charging proposals for motorcycles are also in direct contravention of the Mayor of London's Transport Strategy**, which specifically recognises the critical part low-emission transport options, such as motorcycles, will play in the plans to reduce congestion and harmful emissions across London. In particular, Policy 5 of the Strategy states: "The Mayor, through TfL and the boroughs, and working with stakeholders, will prioritise space efficient modes of transport with the aim of reducing overall traffic levels by 10-15 per cent by 2041." The Mayor's Transport Strategy specifically sets out the need for a modal shift away from cars towards other forms of transport, and touches on the significant role motorcycles can play, for example, in low-impact freight and servicing trips to replace trips by lorry or van, which does not appear to have been considered under the Silvertown and Blackwall Tunnel modelling.
- **Analysis and Modelling in support of the Scheme is inadequate, flawed and not in line with wider TfL strategic modelling informing transport-related planning across London.** It appears that any analysis and/or modelling conducted by TfL to model the impact of motorcycles, and specifically their affect on traffic and congestion levels and on the wider environment, and the effect of the charging proposals on motorcycle freight, courier and servicing trips, has been cursory at best. Indeed, TfL has claimed that "strategic models don't specifically model motorcycles" (TfL's email dated 2 September 2024) despite the fact that TfL currently utilise a range of strategic transport models looking at all modes of transport across London. These include MoTiON (Model of Travel in London), LoHAM (London Highway Assignment Model), Cynemon (which specifically models and visualizes cyclist route choice), ONE (The Operational Network Evaluator) and others, which are used by TfL to assess the impact of different policies, projects and planning decisions so as to inform transport-related planning issues facing London towards the delivery of the Mayor's Transport Strategy.
- **The charging proposals are likely to adversely affect the desired modal shift to less-polluting vehicles.** Importantly, there appears to have been no modelling or analysis regarding the effect of the proposed charges on motorcyclists, other road users and pedestrians, and local communities, from motorcyclists diverting to other routes to avoid the proposed Tunnel charges. Indeed, TfL has recently confirmed that "no specific analysis" has been undertaken. This is despite the stated aims of the charging proposals to manage traffic demand, mitigate congestion and actively incentivise less-polluting vehicles, and the objectives set out in PO5: "to minimise any adverse impacts of any proposals on communities, health, safety and the environment." With motorcyclists more sensitive to pricing issues than many other road users, with many

motorcyclists having switched from four to two wheels to reduce the cost of their journeys, including their commute to and from work, this is a significant oversight given the potential for the proposed charging model to adversely affect the desired modal shift, as set out in wider transport policies for London, to less-polluting vehicles.

- **The proposals as currently framed are likely to increase congestion levels and adversely affect communities around the Tunnels.** There is a potential impact on wider communities around the Tunnels from the proposal to impose a charge for motorcycles which is likely to disincentivise and discourage motorcyclists from using the Tunnels, and lead instead to motorcyclists seeking to utilise longer, more circuitous routes in and out of London to avoid the charges. Where multi-vehicle ownership is a factor, motorcyclists may chose to use a car rather than a motorbike to travel through the Tunnels, increasing potential congestion levels, if the Tunnel charges are the same for both motorcycles and cars. This would mean that the benefits of lower pollution and congestion levels derived from motorcyclists using the Tunnels are not fully realised and increased exposure by the use of longer routes will not benefit road safety.
- **Historic Motorcycles.** We note TfL's remarks regarding historic vehicles and the lack of an exemption in an email from TfL (2nd August). The case for exemption of 'historics' from ULEZ was not just based on the technical difficulty of retrofitting emission control measures. After all, if that really was the case, why not apply the same logic to the same 'difficulty' issue so as to exempt vehicles between 'historic' and Euro 3/4 from the charge? There was a deeper consideration and that was that 'historics' are 'mobile heritage' and as such, and being vehicles not generally in daily use (but used mainly for leisure and recreational purposes), they should not be within scope of a scheme designed to influence use of mainstream transport. The numbers of vehicles involved are small and an exemption from the proposed tunnel charges would confirm the special status which transport authorities accord to 'mobile heritage' - and the consequent loss of revenue would be negligible in any case.

Conclusion

Motorcycles provide an affordable, low emission and accessible transport solution for many people. They have a recognised and significant role to play in reducing overall carbon emissions in towns and cities and in reducing congestion levels; factors previously recognised in TfL's and the Mayor's wider transport policies and strategies for London, including the Congestion Charging zone policy. They also play a positive role in social mobility, economic well-being (as sought under PO3) and the quality of life of users, as an accessible

and less-polluting, greener transport option, particularly given their relatively low purchase and running costs compared to other modes of personal transport. As such, they should be supported by Local Authorities with concessions applied to encourage their use as part of the development of greener and more sustainable transport models.

NMC and BMF therefore strongly object to the proposals put forward by TFL to implement charges for motorcycles to use the Blackwall and Silvertown Tunnels. TFL's charging proposals, as currently set out, are seriously flawed.

They demonstrate little, if any, analysis or modelling in respect of motorcycling and its positive impacts on pollution levels and traffic congestion, both purportedly key objectives of the scheme, and fail to take into account the impact of the proposed charges on motorcyclists safety and the impact on wider communities around the Tunnels, with motorcyclists disincentivised to use the Tunnels and likely to seek out other routes across the Thames instead. The proposals are also contrary to TfL's wider transport policies, including the Congestion Charging Zone policy, and completely fail to take into account the widely recognised benefits of motorcycle use as a means to reduce pollution and congestion levels, which are key objectives of the charging Scheme. Indeed, TfL state in their rationale for the charging Scheme that "The user charges not only control the level of demand but can help to incentivise the use of less-polluting vehicles" but then in the same breath seek to disincentivise the use of less-polluting motorcycles by proposing to charge them to use both Tunnels.

The charging proposals are likely instead to see car use through the Tunnels increase as motorcyclists will have little incentive to choose motorcycle use over a car. The decision to equate motorcycles with cars, with the same fee in some cases charged for both, is completely illogical given the stated aims and objectives of the Scheme; unless the over-riding and primary aim of TfL is simply to raise revenue to pay for the Silvertown Tunnel construction and the future maintenance of both Tunnels, with the other purported aims and objectives of the Scheme, to deliver traffic demand management, together with safety and environmental benefits, entirely subordinate to the key aim to raise revenue.

About the BMF and the NMC

The BMF, formed in 1960, is one of the largest active motorcycling riders' groups in the world with around 214 affiliated motorcycle clubs giving the BMF a collective membership of over 65,000 riders. The BMF works closely with government Ministers and officials, and with numerous road safety organisations and other motorcycling and road transport organisations, to represent motorcyclist interests at local, national, and European level. Through

its collaboration and joint-working with Government, and through its numerous road safety partnerships, the BMF aims to promote greater awareness of the benefits of motorcycling as an accessible, affordable, cleaner and greener transport option, whilst highlighting the significant contribution motorcycling can make to the achievement of Net Zero targets. The BMF also works to ensure that the needs and concerns of the motorcycling community and its 1.4 million riders translates into effective safety improvements for motorcyclists in terms of wider government road policy and highway design.

The National Motorcyclists Council (NMC), originally founded in the 1990s, is the UK coalition of motorcycling representative organisations, representing a wide spectrum of motorcycle use from road riding, green roads riding, heritage motorcycling, motorcycle sport, motorcycle safety, the motorcycle trade and the service sector. NMC members work together on commonly held positions about issues where motorcyclists seek to change or influence government policy in order to help assure a positive and sustainable future for motorcycling. The NMC's membership comprise UK motorcycling representative organisations, plus the sport and road safety interests. NMC members represent around 200,000 individual riders via its member organisations. The NMC also has wider, longstanding partnerships with industry and riders' groups internationally.

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