# Silvertown and Blackwall Tunnels User Charges

User Charging Assessment Framework

November 2024



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#### 1 Overview

The User Charging Assessment Framework (UCAF) is a summary of how the Silvertown Tunnel ('the Scheme', including the proposed user charges) performs against project objectives and other key requirements. The Charging Policy and Procedures (CPAP)<sup>1</sup>, which is a Certified Document of the DCO for the Silvertown Tunnel, states that the UCAF will be used to inform the setting of the opening user charges and for informing any subsequent variations to the charge.

The scoring and description of performance of the Scheme in the refreshed assessment, including proposed user charges reflects the opening year (2025) and is compared with the reference case, that is, without Silvertown Tunnel. Modelled performance is categorised using a seven-point scale (from -3 'major negative change' through 0 'no impact' to +3 'major positive change') and includes a rationale explaining how the Scheme with the user charges performs. Where a qualitative assessment is used, the framework will state whether or not the objective is met. The seven-point scale and colour-key is shown in **Table 1**.

The user charge levels and a list of discounts and exemptions and reimbursements are set out in the Appendix A and B.

Table 1: UCAF seven-point scoring scale

Performance	Score
Major negative change	-3
Negative change	-2
Slight negative change	-1
No impact	0
Slight positive change	1
Positive change	2
Major positive change	3

<sup>&</sup>lt;sup>1</sup> Silvertown Tunnel Charging Policies and Procedures (2017)

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Scheme performance against each metric has been assessed based on a range of information, including outputs and analysis from the refreshed assessment described above - this is summarised for metrics listed under each project objective in **Table 2**.

Further information on the UCAF, and background detail about the refreshed assessment that was undertaken to set the opening tunnel user charge, can be found in the Supplementary Information note that accompanied the user charge consultation between July and September 2024. This document has been updated following this consultation.

Table 2: UCAF assessment types and metric inputs by project objective

Project objective	Assessment type	Metric inputs
1 & 2	Quantitative	Strategic transport modelling outputs, including Scheme impacts on traffic flow, composition, speed, delay and journey times
3	Quantitative	Strategic transport modelling outputs; demographic and socio-economic data on the distribution of population and jobs
4	Qualitative	Reference to current local and strategic land use policies
5	Quantitative	Environmental modelling outputs, including Scheme impacts on air quality (Nitrogen dioxide ( $NO_2$ ) concentration) and noise; demographic and socio-economic data on the distribution of population and jobs
6	Qualitative	Reference to ongoing engagement with local authorities, including the host boroughs
7	Quantitative	Strategic transport modelling outputs and financial assessment outputs
Alignment with other TfL duties	Qualitative	Reference to TfL's network management duty under the Traffic Management Act 2004, as well as other duties such as the public sector equality duty
Compliance with AQ mitigation	Quantitative	Environmental modelling outputs, including Scheme impacts on air quality (NO <sub>2</sub> concentration) and noise

## 2 User Charging Assessment Framework

	e 1: To improve the resilience of the river crossings in the highway network in east and on to cope with planned and unplanned events and incidents		
Project Objective	e 2: To improve road network performance of the Blackwall Tunnel and its approach roads		
Measure	Score and Description of Impact at Opening Year Charge Level		
	+3 Major Positive Change		
Impact on vehicle delay, journey time,	The Scheme, which includes the proposed user charges set out in the appendices, is forecast to result in a large reduction in delay and congestion on the tunnel approaches making vehicle journey times through the tunnel quicker and more reliable in both directions at peak times.		
	Model forecasts indicate that northbound vehicle journey time through the Blackwall Tunnel is forecast to reduce by around 15 minutes in the average morning peak hour (AM peak) and nine		
minutes in the average evening peak hour (PM peak) in the opening year (2025).			
through the Blackwall Tunnel	Southbound vehicle journey time in the evening peak is forecast to reduce by up to 14 minutes (journey time benefits in the morning peak southbound are less significant due to lower levels of traffic in that direction, at that time).		
	However, the savings will often be greater (up to 20 minutes, and sometimes more), particularly when considering the knock-on effects of frequent closures and incidents at the Blackwall Tunnel which the scheme will significantly reduce – something that is not reflected in the transport models.		
	0 No Impact		
Impact on traffic flow and composition at the Silvertown and Blackwall	With new road projects, journey time savings such as those summarised above can result in an increase in traffic on affected routes as more drivers seek to benefit from the reduction in delay and congestion. However, the user charge that will be introduced on both the Silvertown and Blackwall tunnels as part of the Scheme will help to manage vehicle demand to use the tunnels, off-setting this effect.		
tunnels	The total number of cross-river vehicle trips through both tunnels combined is consequently not forecast to change significantly with the Scheme (a two per cent increase in daily traffic is expected		

in the opening year), resulting in no significant impact. Note that the new cross-river bus service is included in this vehicle trip increase.

The user charge will also help to manage Heavy Goods Vehicle (HGV) demand, meaning that no significant impact is forecast on traffic composition - the total number of daily cross-river Heavy Goods Vehicle trips is forecast to reduce by 0.5 per cent (around 30 trips in total) with the Scheme in place.

#### 0 No Impact

The impact on traffic flow and composition at nearby crossings is not forecast to be significant and can be summarised as follows:

**Tower Bridge**: the total number of daily cross-river vehicle trips is forecast to decrease by 0.1 per cent (-72 trips in total) - this includes a forecast increase in daily HGV trips of six per cent, 115 additional vehicle trips.

Impact on traffic flow and composition at nearby crossings (incl. Tower Bridge, Rotherhithe Tunnel, Woolwich Ferry, Dartford Crossing)

**Rotherhithe Tunnel**: the total number of daily cross-river vehicle trips is forecast to increase by four per cent (1,046 trips in total). HGVs are not permitted through the tunnel, this will continue with the Scheme in place.

**Woolwich Ferry**: the total number of daily cross-river vehicle trips is forecast to decrease by one per cent (-39 trips in total) - daily HGV trips are forecast to increase by two per cent, 15 additional vehicles.

**Dartford Crossing**: the total number of daily cross-river vehicle trips is forecast to increase by one per cent (1,615 trips in total) - daily HGV trips are forecast to increase by one per cent, 432 additional vehicle trips.

These forecast changes are not significant and do not meet the criteria identified to determine requirements for mitigation for traffic or environmental issues caused by the Scheme. These criteria were agreed with the Silvertown Tunnel Implementation Group (STIG) during the refreshed assessment.

# Impact on

#### **0 No Impact**

While significant time savings are forecast through the Blackwall Tunnel as summarised above, the Scheme is not forecast to have a significant impact on drivers making journeys on the same side of the River Thames along strategic routes (i.e. the A2, A200, A207, A206, A13 and A12). In some cases, journey times are forecast to decrease partly due to a reduction in delay and queuing on the Blackwall Tunnel approaches, for example along the A2 northbound between Falconwood and Sun-in-the-Sands (by approximately three minutes in the AM peak) and the A13 eastbound from Limehouse to Beckton Roundabout (by approximately two minutes in the PM peak).

In other cases, journey times are forecast to increase (for example, the A2 eastbound from New Cross to Sun-in-the-Sands and the A206/A200 westbound from the A102 to Rotherhithe in the PM peak) albeit these increases do not exceed two minutes in any time period with the Scheme in place. This mix of slight increases and decreases in journey time on various strategic routes results in an overall assessment of 'no impact'.

Traffic signal timings along key routes have been reviewed and will be optimised at relevant junctions to minimise delays as part of a planned comprehensive monitoring plan.

#### **0 No Impact**

Impact on traffic on diversion routes and local roads

journey times along strategic

routes

Traffic flow and composition is not forecast to change significantly on other roads because of the Scheme. The volume of traffic (measured in terms of total daily vehicle-kilometres) in Greenwich. Tower Hamlets and Newham is forecast to decrease in all time periods, except for Tower Hamlets in the evening peak (an increase of three per cent) and Newham in the morning peak (an increase of less than one per cent). These increases mostly occur on strategic routes (for example the A12).

Traffic on some local roads such as Chrisp Street, Manor Road and Abbott Road is conversely forecast to decrease. In most time periods there is little change in the average speed of traffic, except for an increase from 21kph to 24kph in the morning peak in Greenwich and an increase from 17kph to 19kph in the evening peak in Tower Hamlets. As with the changes in traffic flow, this is primarily caused by improved conditions on strategic routes in these boroughs linked to a reduction in queuing on the Blackwall Tunnel approaches.

	Objectives Met
Overall impact against Project Objectives	trainio roato tadanta resinerios, ana introducina ascronaraes set at a lever to reduce vernole jedinicy

Project Objective 3: To support economic and population growth, in particular in east and southeast London by providing improved cross-river transport links.		
Measure	Description of Impact at Opening Year Charge Level	
	+3 Major Positive Change	
Impact on user benefits	The Scheme is forecast to reduce vehicle journey time through the Blackwall Tunnel (including bus route 108) and improve journey time reliability by reducing congestion and queuing on the tunnel approaches through capacity enhancements and demand management through user charges. It will also provide two new cross-river bus routes (129 & Superloop Bus route SL4) through the Silvertown Tunnel. In the opening year, these improvements are forecast to save 9,800 vehicle-hours per day and 2,800 public transport passenger-hours per day (07:00-19:00).  In the Business Case for the Scheme, which has been developed in line with Government guidance, the value of these time savings to tunnel users is forecast to outweigh the cost of the user charge, resulting in a net benefit. Some residents from low-income households will also qualify for a discount to reduce the cost of the user charge.	
	+3 Major Positive Change	
Impact on business	The forecast reduction in vehicle journey time and improvement in journey time reliability through the Blackwall Tunnel will deliver a significant economic benefit for businesses. In the opening year, people travelling on business (including Light Goods Vehicles and Heavy Goods Vehicles drivers) are forecast to save 5,800 vehicle-hours per day due to the Scheme.	

New cross-river bus routes (129 & SL4) and lower journey times on the Route 108 will also increase the number of people within 60 minutes' public transport travel time of major employment locations such as Canary Wharf, Stratford, Lewisham and Greenwich Town Centre - this will improve access to more potential workers for businesses and employers.

Eligible small businesses, sole traders and charities based in the host boroughs<sup>2</sup> can register a maximum of three vehicles to receive a £1 discount on standard off-peak charges for a period of at least 12 months from tunnel opening.

#### +2 Positive Change

Residents will benefit from a forecast reduction in vehicle journey time and improvement in journey time reliability through the Blackwall Tunnel. In the opening year, car commuters are forecast to save 1,500 vehicle-hours per day with public transport commuters saving 900 passenger-hours per day (07:00-19:00).

Impact on the ability of residents to access employment opportunities

Although the user charge will be a new cost for residents, the overall value of time savings to tunnel users is forecast to outweigh the cost, resulting in a net benefit. Residents in east London boroughs<sup>3</sup> from qualifying low-income households will also receive a discount to reduce the cost of the user charge.

The new cross-river bus network including routes 129 & Superloop SL4 and lower journey times on the Route 108 will enable residents on the Greenwich Peninsula to access over 43,000 more jobs within a 60-minute journey.

Similarly, residents of West Silvertown will be able to access over 21,000 more jobs within a 60-minute journey.

<sup>&</sup>lt;sup>2</sup> London Borough (LB) Newham, LB Tower Hamlets, Royal Borough (RB) Greenwich

<sup>&</sup>lt;sup>3</sup> London Borough (LB) Barking & Dagenham, LB Bexley, LB Bromley, City of London Corporation, Royal Borough (RB) Greenwich, LB Hackney, LB Havering, LB Lewisham, LB Newham, LB Redbridge, LB Southwark, LB Tower Hamlets, LB Waltham Forest.

Impact on public transport	Hagior Positive Change  Bus route 108 uses the Blackwall Tunnel and the congestion on the tunnel approaches, alongside frequent tunnel closures, means this route has extended journey times and poor journey time reliability. The additional capacity provided by the Scheme, with the user charge to manage demand, will result in quicker and more reliable journeys on the 108 route as journeys will be more free-flowing and there will be fewer incidents of tunnel closures, particularly in the northbound direction. The two new cross-river routes (129 & SL4) through the Silvertown Tunnel will create new sustainable travel opportunities for people on both sides of the river.
	Objective Met
Overall impact against Project Objective	The Scheme is forecast to deliver Project Objective 3 through the provision of new cross-river bus network and reduced journey times as a result of enhanced capacity and user charges as well as improved reliability, for Route 108 passengers and other vehicle users. This is forecast to improve people's access to jobs, services and leisure and better connect businesses with their customers and suppliers, supporting economic and population growth in east and southeast London.

Project Objective 4: To integrate with local and strategic land use policies		
	Objective Met	
Overall impact against Project Objective	The design of the Scheme, including the level of the proposed user charges to manage demand and emissions, reduces the severance which makes the area appealing for a variety of local and strategic land uses in east London. For instance, the scheme has been designed to facilitate future development at key sites, e.g. Tidal Basin Roundabout.	

Measure	Description of Impact at Opening Year Charge Level
Impact on emission levels (air quality) on the Silvertown and Blackwall tunnel approaches	The Scheme is not forecast to cause any exceedances of national air quality objectives (air quality limits and target values for a range of emissions that the UK must comply with for the purposes of National and Local Air Quality Management).  Nitrogen dioxide (NO₂) concentration on the A102 south of the Blackwall Tunnel is forecast to decrease by an average of 2.9 micrograms per cubic metre of air (μg/m³) due to the Scheme at the proposed user charge levels.  NO₂ concentration on Silvertown Way and Tidal Basin Road (on the northern approach to the Silvertown Tunnel) are forecasted to slightly increase (by 1.3 μg/m³ and 0.7 μg/m³ respectively). None of these changes are significant. NO₂ concentrations on the A12 north of the Blackwall Tunne is expected to decrease by 2.4 μg/m³.
Impact on	0 No Impact
emission levels (air quality) on the approaches to nearby crossings including Tower Bridge, Rotherhithe Tunnel and	Little change is forecast in air quality on neighbouring crossings due to the Scheme. The Rotherhith Tunnel southern portal is forecast to experience an insignificant increase in $NO_2$ concentration (of 0.1 $\mu g/m^3$ ) which does not exceed the national air quality objective for $NO_2$ .

Woolwich Ferry

Impact on noise	0 No Impact
levels on the Silvertown and Blackwall tunnel approaches	Noise levels on the tunnel approaches are forecast not to change due to the Scheme. An insignificant increase of 1.3 decibels (db) is forecast on Tidal Basin Road. The Scheme is forecasted not to have a noise impact on properties or justify property-specific noise insulation measures.
Impact on noise	0 No Impact
levels on the approaches to nearby crossings incl. Tower Bridge, Rotherhithe Tunnel and Woolwich Ferry	Noise levels at neighbouring crossings are forecast not to change due to the Scheme. The Scheme is forecast not to have a noise impact on properties or justify property-specific noise insulation measures.
	0 No Impact
Impact on emissions (air quality) levels on diversion routes and local roads	Little change is forecast in air quality on diversion routes and local roads due to the Scheme. An insignificant increase is forecast on the A12 south of Bow Roundabout (+0.7 μg/m3 in NO2 concentration).  A small decrease in NO2 concentration is forecast on the A13 East India Dock Road (-2 μg/m3), Cotton Street (-1.3 μg/m3), and Abbott Road (-0.6 μg/m3), one of the routes identified above as benefitting from a forecast reduction in rat-running due to the Scheme.

	0 No Impact
Impact on noise levels on diversion routes and local roads	Noise levels on diversion routes and local roads are not forecast to change due to the Scheme. Insignificant increases in noise (of 2.2db and 1.6db) are forecast respectively on Lower Lea Crossing and Aspen Way. Insignificant decreases in noise (of 2.5db and 1db) are forecast respectively on Abbott Road and the A13 East India Dock Road. The Scheme is not expected to produce any noise impact on properties or justify property-specific noise insulation measures.
Impact on different socio- economic groups	Given proposed discounts and exemptions, the user charge is not expected to significantly impact accessibility by car for vulnerable populations (for example disabled people), who will also benefit from improved journey times and journey time reliability. Cross-river severance is considered to be improved due to improvements in connectivity, including by public transport.  New cross-river bus routes (129 & SL4) and improved journey times on the Route 108 will also provide significant benefits for multiple groups of people and provide viable cross-river alternatives to private vehicle use. Of all the households within 400m of a bus stop on this new cross-river bus network, 60 per cent are in low-income areas; nearly 60 per cent do not have access to a car; and over 50 per cent identify as predominantly Black or minority ethnic.  Further information can be found in the Equality Impact Assessment.
Impact on safety	The design of the Scheme and mitigations meet all relevant safety standards.  People from more deprived areas, some ethnic minorities, disabled people, children and older people are disproportionately affected by road danger in London. However, no impacts on road safety due to changes in traffic levels and speeds on local roads resultant of the Scheme have been identified.

Objective	Met
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# Overall impact against Project Objective

The Scheme is forecast to deliver Objective 5. A step-change in cross-river bus services will provide significant benefits to multiple groups of people. The Scheme is also forecast to improve air quality on the Blackwall Tunnel approaches, the A13 East India Dock Road, Cotton Street, West Parkside and Abbott Road.

No significant negative impacts are expected on communities, health, safety, or the environment. The Scheme in operation at this charge level is not forecast to give rise to materially new or materially different environmental effects to those reported in the Environmental Statement.

## Project Objective 6: To ensure where possible that any proposals are acceptable in principle to key stakeholders, including affected boroughs

#### **Objective Met**

# Overall impact against Project Objective

As per Article 66(5)(e) of the DCO, the views of Silvertown Tunnel Implementation Group (STIG) members (which includes officers from eleven London boroughs, City of London and National Highways) were collated as part of the consultation on the opening user charge levels as well as the proposed exemptions and discounts.

All responses to issues raised by key stakeholders, including STIG members, are included in Appendix A of the Silvertown and Blackwall Tunnel User Charges Consultation Report. This can be found on the Silvertown and Blackwall tunnels user charge consultation website.

#### Project Objective 7: To achieve value for money and, through road user charging, to manage congestion

# Overall impact against Project Objective

#### **Objective Met**

The Scheme is forecast to deliver Objective 7: new cross-river road capacity will reduce congestion and queuing on the Blackwall Tunnel approaches and the user charge will manage traffic levels (see measures for Objectives 1 and 2).

Revenue generated by the user charge is forecast to cover the costs of building, maintaining and operating the Scheme, meaning that it will deliver value for money.

Any additional revenue raised over and above these costs will be reinvested in London's transport network.

## Other TfL duties (TfL's network management duty under the Traffic Management Act 2004; compliance with relevant legislation relating to TfL's functions)

#### Impact aligned with TfL duties

# Overall impact against Project Objective

At the proposed levels, the user charge will enable us to fulfil our network management duty to maintain the expeditious movement of road users in addition to complying with the Development Consent Order requirements.

This specifically relates to balancing the demands and priorities of all road users, including pedestrians and cyclists to minimise congestion and disruption. Traffic monitoring will continue once the tunnel is opened for a least three years to allow changes in traffic patterns to be analysed.

The work on the refreshed assessment and setting of the initial charges is also aligned with the Public Sector Equality Duty. The Equality Impact Assessment can be found on the <u>Silvertown and</u> Blackwall tunnels user charge consultation website.

Compliance with AQ mitigation			
	Impact compliant		
Overall impact against Project Objective	Overall impact of the Scheme with the proposed user charge is forecast not to cause any exceedances of national air quality objectives and meets the objective of not worsening emissions overall. Decreases in NO <sub>2</sub> concentrations are expected in many areas alongside some very small increases in a small number of locations.  Air quality will continue to be monitored against national air quality objectives in accordance with DCO requirements. We and the London Boroughs continue to monitor air quality across the city.		

## **Appendix A – Tunnel User Charges**

Silvertown and Blackwall User Charges – 06:00 – 22:00				
	Charges paid via Auto Pay		Charges paid via other channels	
	Standard off-peak charges	Peak charges  Mon-Fri only  Northbound 06:00-10:00 Southbound 16:00-19:00	At all times	
Motorcycle, moped, motor tricycle	£1.50	£2.50	£2.50	
Car and small van	£1.50	£4.00	£4.00	
Large van	£2.50	£6.50	£6.50	
Heavy Goods Vehicles	£5.00	£10.00	£10.00	

Penalty Charge Notice for non-payment - £180 (Reduced to £90 if paid within two weeks; maximum one PCN per day)

# Appendix B – Discounts, exemptions and reimbursements for the Silvertown and Blackwall tunnels user charges

Discounts	Eligibility Criteria
50 per cent Discount	
East London low-income residents' discount (for a period of at least three years)	To qualify individuals must live within an east London borough <sup>4</sup> and be in receipt of certain benefits <sup>5</sup> .
£1 discount business discount on standard off-peak charges	
Business discount (for a period of at least 12 months)	Eligible small businesses, sole traders and charities based in the host boroughs can register a maximum of three vehicles to receive a £1 discount on off-peak charges.
100 per cent Discount	
Recovery and breakdown vehicles	This discount applies to recovery and breakdown vehicles operated by organisations in the European Economic Area that are accredited to BS EN ISO9001:2008 (and in accordance with the specification for applying that standard to the industry).
Vehicles with 9+ seats	This discount applies to vehicles with nine seats or more (vehicles registered with the DVLA as a minibus, bus or coach will automatically receive a discount and will not need to apply for the discount).
Blue Badge holders	This discount applies to individuals who hold a valid Blue Badge in the European Economic Area. Individuals can register up to two vehicles that would be used to travel though Silvertown or Blackwall Tunnels. This could be their own vehicle, or one they travel in.

<sup>&</sup>lt;sup>4</sup> London Borough (LB) Barking & Dagenham, LB Bexley, LB Bromley, City of London Corporation, Royal Borough (RB) Greenwich, LB Hackney, LB Havering, LB Lewisham, LB Newham, LB Redbridge, LB Southwark, LB Tower Hamlets, LB Waltham Forest.

<sup>&</sup>lt;sup>5</sup> Carer's Allowance, Child Tax Credit, Housing Benefit, Income-related Employment & Support Allowance, Income-based Jobseekers Allowance, Income Support, Universal Credit, State Pension Credit, Working Tax Credit

Certain operational vehicles	This discount applies to qualifying organisations that operate vehicles performing certain essential public services including certain services provided by the host boroughs <sup>6</sup> . Eligibility is determined by TfL.
Waste collection and waste disposal vehicles used by east London boroughs <sup>7</sup>	This discount applies to vehicles being used by east London boroughs to provide waste collection and disposal services. Eligibility is determined by TfL.
Zero-Emission Capable and Wheelchair Accessible private hire vehicles (PHVs)	This discount applies to PHVs designated as wheelchair-accessible vehicles or zero emission capable as long as they are fulfilling a private hire booking and are licensed with London Taxi and Private Hire.

Exemptions			
Taxis	This exemption applies to taxis which are licensed with London Taxi and Private Hire.		
Emergency services vehicles exempt from vehicle tax	This exemption applies to emergency service vehicles which are exempt from vehicle tax on the date of travel.		
NHS vehicles exempt from vehicle tax	This exemption applies to NHS vehicles that are exempt from vehicle tax.		
Vehicles in the disabled tax class	This exemption applies to vehicles used by disabled people that are exempt from vehicle tax.		
Military vehicles in use	This exemption applies to vehicles currently used by the armed forces including visiting services or international organisations.		

 <sup>&</sup>lt;sup>6</sup> LB Newham, LB Tower Hamlets and RB Greenwich
 <sup>7</sup> East London boroughs are those listed in footnote 1 above.

Reimbursements <sup>8</sup>		
	NHS patients are eligible for reimbursement if:	
	1. Clinically assessed as too ill, weak or disabled to travel to an appointment on public transport, and any of following apply:	
NHS Patient Reimbursement <sup>9</sup>	<ul> <li>Have a compromised immune system (problems with your immune system)</li> <li>Require regular therapy or assessment</li> <li>Require recurrent surgical intervention</li> </ul>	
	OR 2. During an epidemic or pandemic prevalent in Greater London, are clinically assessed as being too vulnerable to infection to travel to an appointment on public transport.	
	NHS staff members, are eligible for reimbursement if any of the following criteria is met:  1. Those using their vehicles to carry any of the following:  • Bulky, heavy or fragile equipment/supplies  • Patients' notes or other confidential material  • Controlled drugs	
NHS Staff Reimbursement	<ul> <li>Clinical waste, contaminated sharps, radioactive materials or non-medicinal poisons</li> <li>Prescription-only medicines or waste medicinal products</li> <li>Clinical specimens, body fluids, tissues or organs</li> </ul>	
	OR 2. Those responding to an emergency or other extraordinary circumstances when on call.	

Before making a claim for reimbursement, the user charge must be paid on or before the day of your journey, or the vehicle used for the journey must be registered for a TfL Auto Pay account.
 The NHS trust or hospital must be registered with TfL for the reimbursement scheme. Any refund request should be made through the NHS trust

or hospital as they manage the reimbursement process, not TfL.