Fares from 2 March 2025 TfL Advice to the Mayor

5 December 2024

Executive Summary

The Mayor is committed to making London's public transport network affordable for everyone and has asked TfL to advise him on a proposal to freeze all fares on buses and trams and apply a 4.6 per cent increase on Tube, and all other rail services in London where Tube fares apply; while continuing to protect all TfL concessions. This proposal would see an overall fares increase of 3.6 per cent across all of TfL fares.

Should the Mayor approve this decision, TfL fares in March 2025 will increase, on average, by 3.6 per cent. Bus and tram fares will be frozen for the second year in a row. On the Tube, and other rail services in London where Tube fares apply, pay as you go (PAYG) single fares will increase (in line with NR fares policy) by 4.6 per cent.

TfL's advice recognises the fare agreements with the Train Operating Companies (TOCs) and national government. These agreements determine the prices of Travelcards, the associated pay as you go (PAYG) caps and certain fares on TfL's rail services. As a result, Travelcard prices and the cost of the multi-modal PAYG caps are set by agreement with the TOCs. The TOCs have been instructed by the Department for Transport (DfT) to increase their regulated fares by 4.6 per cent. These increases reflect national government rail fares policy over which the Mayor has no control.

This paper sets out TfL's advice to the Mayor on the implementation of an overall fares increase of 3.6 per cent increase in March 2025. Subject to the Mayor's approval, the fares increase will be implemented from 2 March 2025.

Introduction and background

- 1.1 To support Londoners during a cost-of-living crisis and ensure that transport is as affordable as possible, the Mayor has asked TfL to advise him on a proposal to freeze all fares on buses and trams and apply a 4.6 per cent fares increase to fares on London Underground (LU); the Docklands Light Railway (DLR); the London Overground; and Elizabeth line services where Tube fares apply; and train operating company (TOC) services that accept fares set by TfL. This paper sets out TfL's advice to the Mayor on fares for 2025 accordingly.
- 1.2 The Mayor has previously frozen TfL fares, keeping them at 2016 levels until 2021. The Mayor increased TfL fares for the first time in 2021, and then subsequently in 2022 and 2023 due to conditions of government funding settlements made within the extremely financially challenging circumstances arising from the COVID-19 pandemic. In 2024, the Mayor again froze TfL fares. Collectively, these decisions mean that TfL fares are 14 per cent lower than if they had risen in line with national rail (NR) fares throughout that period.
- 1.3 Public transport usage has been affected by changes in travel patterns since the COVID-19 pandemic; this has impacted the revenue collected by TfL. Passenger levels have been recovering and are currently around 93 per cent of pre-pandemic levels.
- 1.4 Travelcard prices and the cost of the multi-modal PAYG caps are set by agreement with the TOCs. The TOCs have been permitted by the DfT to increase their regulated fares by 4.6 per cent.

Overview of proposed fares in March 2025

1.5 TfL fare proposals for 2025 are set out below. The proposals set out freezing bus and tram fares, but with a 4.6 per cent overall increase on TfL tube and rail fares that are under the Mayor's control.

Bus and Tram fares

- 1.6 In March 2025, bus and tram fares will be frozen at the same level as set in 2023 (see Table 1.1).
- 1.7 The Hopper fare will continue to permit unlimited free transfers within an hour of a first-paid-for bus or tram PAYG journey.
- 1.8 The adult PAYG single fare remains at £1.75. The daily bus and tram cap remains at £5.25, equal to the price of three single fares. The 7 Day Bus & Tram Pass remains at £24.70.
- 1.9 The half-adult and child bus and tram fares will remain at £0.85.

Table 1.1: Bus and Tram adult fares in March 2025

	Current	March 2025	Increase
PAYG – single	£1.75	£1.75	0%
PAYG – daily cap	£5.25	£5.25	0%
7 Day Bus & Tram Pass	£24.70	£24.70	0%
1 Day Bus & Tram Pass	£6.00	£6.00	0%

- 1.10 On Tube and other TfL rail services where Tube fares apply (as above), PAYG single fares will increase overall by 4.6 per cent (see Table 1.2), with special single fares applying for journeys to and from Heathrow on the Elizabeth line.
- 1.11 PAYG is used for around 75 per cent of journeys made on Tube and TfL rail services.

Table 1.2: Adult PAYG fares on TfL rail services in March 2024

Number of zones	Current		March 2024		Increase	
	Peak	Off Peak	Peak	Off-peak	Peak	Off-peak
Zones incl. Zone 1						
1	£2.80	£2.70	£2.90	£2.80	3.6 %	3.7 %
2	£3.40	£2.80	£3.50	£2.90	2.9 %	3.6 %
3	£3.70	£3.00	£3.80	£3.10	2.7 %	3.3 %
4	£4.40	£3.20	£4.60	£3.40	4.5 %	6.3 %
5	£5.10	£3.50	£5.20	£3.60	2.0 %	2.9 %
6	£5.60	£3.60	£5.80	£3.80	3.6 %	5.6 %
Zones excl. Zone 1						
1	£1.90	£1.80	£2.10	£2.00	10.5 %	11.1 %
2	£2.10	£1.90	£2.30	£2.10	9.5 %	10.5%
3	£2.80	£1.90	£3.00	£2.20	7.1 %	15.8 %
4	£3.00	£2.00	£3.20	£2.30	6.7 %	15.0 %
5	£3.40	£2.10	£3.60	£2.40	5.9 %	14.3 %

Travelcard season tickets in Zones 1-6

1.12 Travelcard season ticket prices increase as shown in Table 1.3. The overall increase across all Travelcards is 4.6 per cent reflecting national Government rail fares policy.

Table 1.2: Travelcard seasons – 7 Day ticket prices

Number of zones	Current	March 2024	Change
Including Zone 1			
2	£42.70	£44.70	4.7%
3	£50.20	£52.50	4.6%
4	£61.40	£64.20	4.6%
5	£73.00	£76.40	4.7%
6	£78.00	£81.60	4.6%
Excluding Zone 1			
2	£32.00	£33.50	4.7%
3	£35.50	£37.10	4.5%
4	£42.50	£44.50	4.7%
5	£53.40	£55.90	

Tube cash fares in Zones 1-6

- 1.13 Cash fares (also known as paper tickets) for Zones 1-6 will remain at £7.00 for a single ticket. Child cash fares for those aged 11 to 15 remain at half the adult rate. Accompanied under-11s will continue to travel for free.
- 1.14 Fewer than 1 per cent of Tube journeys are now made with cash fares.
- 1.15 Cash fares in Zones 1-6 on services where NR fares apply will increase overall by 4.6 per cent, reflecting national government's rail fares policy.

One day PAYG price caps in Zones 1-6

- 1.16 Tables 1.4.1 and 1.4.2 below set out the proposed all day PAYG caps and Day Travelcard ticket prices.
- 1.17 The all-day PAYG caps are set by agreement with the TOCs to be 20 per cent of 7 Day Travelcard prices. The caps increase by between 40p and 70p in proportion to the increases in Travelcard season ticket prices, which are increasing overall by 4.6 per cent, reflecting the national government's rail fare policy.

Table 1.4.1: All Day PAYG caps in 2024 and 2025

	All day caps			
Zones	Current March 2025		Change	
1-2	£8.50	£8.90	4.7%	
1-3	£10.00	£10.50	5.0%	
1-4	£12.30	£12.80	4.1%	
1-5	£14.60	£15.30	4.8%	
1-6	£15.60	£16.30	4.5%	

One Day Travelcard tickets

1.18 The prices of both the Zones 1-6 off-peak Day Travelcard, and the Zones 1-4 Anytime Day Travelcard, will increase by 70p to £16.60. The Zones 1-6 All Day Travelcard ticket price will increase by £1.00 to £23.60. These fares are set in agreement with TOCs and are increasing overall by 4.6 per cent, reflecting the national government's rail fare policy.

Table 1.4.2: Day Travelcard tickets in 2024 and 2025

	Day Travelcards				
	Current	March 2025	Change		
All day 1-4	£15.90	£16.60	4.4%		
All day 1-6	£22.60	£23.60	4.4%		
Off-peak 1-6	£15.90	£16.60	4.4%		

Concessions and discounts on TfL rail services

- 1.19 For under-16s, all-Day Travelcard prices and peak PAYG daily caps are set at half the adult rate and increase in line with adult prices. The under-16s off-peak cap available through the Zip Card increases by 10p to £1.90.
- 1.20 Accompanied under-11s continue to travel free on all TfL services; and on TOC services, provided a valid Zip Card is held.
- 1.21 These fares are set in agreement with TOCs and are increasing overall by 4.6 per cent, reflecting the national government's rail fare policy.
- 1.22 Existing concessions and discounts for eligible groups are unchanged.
 - Tube fares for travel beyond Zone 6
- 1.23 Beyond the Greater London area, PAYG and cash single fares involving Zones 7 to 9 applying on the Tube and on certain other rail services will increase in line with the general NR increase of 4.6 per cent.
- 1.24 Travelcard prices and the associated PAYG caps with coverage in Zones 7 to 9 increase by an average of 4.6 per cent, as set by agreement with the TOCs and reflect national government rail fares policy.
 - Fares on services transferred to TfL in May 2015
- 1.25 On the Greater Anglia to Liverpool Street services transferred to TfL in May 2015, NR cash single fares and point-to-point season prices were retained as part of the transfer arrangements. These NR fares will increase in line with the general NR increase of 4.6 per cent.
 - Fares on services transferred to TfL in May 2018
- 1.26 On the Great Western and Heathrow Connect services transferred to TfL in May 2018, NR cash single fares and point-to-point season prices were retained as part of the transfer arrangements. These NR fares will increase in line with the general NR increase of 4.6 per cent.
- 1.27 The TfL-set supplements to the Heathrow fares will increase in line with general NR increase of 4.6 per cent.
 - Fares on the Elizabeth line service to Reading
- 1.28 Since 15 December 2019 a TfL service has run between Reading and Paddington. Under agreements reached over 10 years ago between the DfT and TfL, common fares will apply on TOC and TfL services.
- 1.29 On these services, NR cash single fares and point-to-point season prices were retained as part of the transfer arrangements. These NR fares will increase in line with the general NR increase of 4.6 per cent.
 - IFS Cloud Cable Car
- 1.30 On the IFS Cloud Cable Car, the one-way adult fare to ride on the cable car will increase to £7.00. The child fare will remain at 50 per cent of the adult fare. Table 1.5 below sets out the fares.

1.31 The carnet ticket price will increase by 20p to £1.90 per journey. This will continue to support local and regular users of the service.

Table 1.5: IFS Cloud Cable Car fares in 2024 and 2025

	Current	March 2025	Change
Adult			
One-way	£6.00	£7.00	14.3%
Round trip	£12.00	£13.00	7.7%
Child			
Single	£3.00	£3.50	14.3%
Round trip	£6.00	£6.50	7.7%

2. Expected outcomes

- 2.1 The Mayor is under a statutory duty to develop and implement policies for the promotion and encouragement of safe, integrated, efficient and economic transport facilities and services to, from and within Greater London. This advice concerns a proposed freeze on all TfL bus and tram fares and an increase in fares on all other rail services in London where Tube fares apply by 4.6 per cent, while continuing to protect all TfL concessions.
- 2.2 The Mayor wants to ensure any fares policy keeps fares as affordable as possible, and is fair and equitable for customers. The fares policy and decision also need to ensure that TfL continues to be run in a manner that is financially sustainable (where its operating income is sufficient to cover its operating costs) and sufficient government funding is secured for required capital investment and major capital projects; enabling TfL to deliver on other priorities that underpin its Business Plan, and which support the delivery of the Mayor's Transport Strategy.
- 2.3 The fares proposal set out in the Mayoral Decision 3318 is considered to be the most effective way of delivering fares that are affordable, fair, and equitable for customers; that will enable TfL continue to be run in a manner that is financially sustainability; and that will secure sufficient government funding for required capital investment and major capital projects enabling TfL to deliver on other priorities that underpin its Business Plan, and which support the delivery of the Mayor's Transport Strategy.

3. Equality comments

- 3.1 Under section 149 of the Equality Act 2010, the Mayor and TfL, as public authorities, are subject to a public sector equality duty and must have 'due regard' to the need to: (i) eliminate unlawful discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act; (ii) advance equality of opportunity between people who share a relevant protected characteristic and those who do not; and (iii) foster good relations between people who share a relevant protected characteristic and those who do not. Relevant protected characteristics under the Equality Act are age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, and sexual orientation.
- 3.2 The duty above applies to the Mayor's duty to direct TfL as to the general level and structure of fares under the Greater London Authority Act 1999 (GLA Act).
- 3.3 Amongst the protected groups, TfL has identified seven groups of Londoners (highlighted below) who typically face barriers to public transport use. Among the key issues for these groups is the cost of fares, and set out below is an assessment of the potential impact of this fares decision on those groups.
- 3.4 Londoners with protected characteristics are likely to be affected by increases in fares. Statistically they are more likely to be on low incomes.
- 3.5 **Black, Asian and Minority Ethnic Londoners** are more likely to live in low-income households; to cite affordability as a barrier to transport; and to use buses rather than the Tube. The freezing of bus and tram fares should reduce barriers to travel for Black, Asian and Minority Ethnic Londoners, as it will provide a real-terms reduction in fares. The proposed increase tube and rail fares is likely to negatively impact those using or reliant those services.

¹ TfL, Travel in London: Understanding our diverse communities 2019

- Women are more likely to be the primary carer at home, so are less likely to be in full-time employment, and more frequently cite affordability as a barrier to transport. Women are also more likely to use buses than the Tube.² The freezing of bus and tram fares should reduce barriers to travel for women, as it will provide a real-terms reduction in fares. The proposed increase in tube and rail fares is likely to negatively impact those using or reliant those services.
- 3.7 **Older Londoners** are more likely to be retired, and many live on low incomes. The 60+ concession, and the Freedom Pass available to older people, mean that the proposed March 2025 fares are likely to have limited impacts on older residents living in London. Under these concessionary schemes, all Londoners aged 60 or over are eligible for free travel on all TfL modes and most NR services in London after 9am on weekdays and at all other times at weekends and bank holidays. This concession will remain unchanged by this fares revision. For those who need to travel before 9am on weekdays, the freezing of bus and tram fares should reduce barriers to travel, as it will provide a real-terms reduction in fares. The proposed increase in tube and rail fares is likely to negatively impact those Older Londoners using or reliant on those services before 9am on weekdays.
- 3.8 **Disabled Londoners** are more likely to live in low-income households. One in three families in London with a disabled child live in poverty.³ One of the reasons for this is the higher costs of supporting a disabled child. In some cases, it can be three times more expensive to bring up a child with an impairment.⁴ Carers are also likely to experience financial hardships as a knock-on effect of the need to take lower-paid and part-time work.
- 3.9 The Disabled Person's Freedom Pass for disabled people means that the proposed March 2025 fares will not impact some disabled people, as they can travel for free at all times with this concession. Parents of disabled children, and some disabled Londoners who are not eligible for a Freedom Pass, may have their income impacted by barriers to employment, but not benefit from the Freedom Pass concession. The eligibility criteria for the pass can mean that applications from some disabled people (for example, adults with learning difficulties) are not successful. The criteria for obtaining a pass is stricter than that for qualifying as disabled under the Equality Act 2010. Some individuals who qualify as disabled under the Equality Act 2010 will not be eligible for a Disabled Person's Freedom Pass. This group may have lower incomes but not benefit from travel concessions. The freezing of bus and tram fares should reduce barriers to travel for these groups, as it will provide a real-terms reduction in fares. The proposed increase tube and rail fares is likely to negatively impact those using or reliant those services.
- 3.10 **Younger Londoners** are more likely to be from a Black, Asian or Minority Ethnic community, and therefore more likely to be experiencing the financial barriers discussed above.⁵ The Zip Card concession which allows free or discounted travel and the freezing of bus and tram fares will limit the negative impact of the proposed March 2025 fare changes on younger Londoners.
- 3.11 **Londoners on low incomes** tend to be women; older, Black, Asian, Minority Ethnic and disabled people; and those not in work. A low income largely reflects working status, though the underlying causes may be tied to the cost of housing, childcare and transport, as well as access to education, qualifications and health. Among children living in poverty,

² TfL, Travel in London: Understanding our diverse communities 2019

³ GLA, Poverty in London: 2015/16 Intelligence Update, 5 April 2017

⁴ Joseph Rowntree Foundation, Paying to care: The cost of childhood disability, 1998

⁵ GLA, London's diverse population

more of them are part of low-income working families than workless families.⁶ London has the highest poverty rates in the UK across all age groups. ⁷ The freezing of TfL bus and tram fares should reduce barriers to travel for low-income Londoners, as it will provide a real-terms reduction in fares.

- 3.12 Londoners on low incomes are more likely to use buses than the Tube. The fares freeze on buses should particularly benefit low-income Londoners whose priority tends to be local trips by bus, as all bus fares are being frozen resulting in a real-terms reduction in fares. The Hopper fare, which provides unlimited bus and tram travel within an hour for the price of a single fare, continues to help keep the cost of travel low. The proposed increase tube and rail fares is likely to negatively impact those using or reliant those services.
- 3.13 **LGBTQ+ Londoners** have reported hate crime as their major concern in relation to transport. The March 2025 fare changes have no specific implications for LGBTQ+ Londoners, except where they also have any of the other protected characteristics set out above.
- 3.14 Some people in the groups identified above are likely to benefit from free travel concessions or discounted fares related to age, disability status or receipt of income-related benefits. Concessionary fare schemes are being maintained in order to keep public transport accessible to people who face barriers to public transport use.
- 3.15 The concessions available are set out below:
 - Children under 11 travel free on all TfL services (subject to a maximum of four accompanying an adult).
 - 11-15 Oyster photocard provides free TfL bus and tram travel and reduced fare rail travel in London.
 - 16+ Oyster photocard provides free TfL bus and tram travel and half fare rail travel in London.
 - 18+ Student Oyster photocard provides reduced rate TfL Bus and Tram Pass season and Travelcard season travel.
 - the 18-25 Care Leavers Oyster photocard provides half price TfL bus and tram travel, including half price TfL Bus and Tram Pass and half price on Santander Cycles subscriptions.
 - Job Centre Plus Travel Discount Card provides half price TfL bus, tram and rail travel
 - Bus & Tram Discount photocard provides half price TfL bus and tram travel.
 - Veterans Concessionary Travel provides free travel in London.
 - 60+ London Oyster photocard (men and women over 60 up to state pension age) provides free travel in London except between 0430 and 0859 on weekdays, excluding bank holidays.
 - London Freedom Pass (people above state pension age and people with an eligible disability) provides free travel in London. There are restrictions on the use

⁶ Trust for London, <u>London's Poverty Profile: Children</u>

⁷ Trust for London, London's Poverty Profile: Poverty and life stages

⁸ Travel in London: Understanding our diverse communities 2019, TfL

of the older persons' Freedom Pass concessions between 04:30 and 8:59 on weekdays, excluding bank holidays.

- 3.16 At the time of taking the Mayoral Decision, the Mayor is required to have due regard to the matters set out in paragraph 3.1 above, and should consider the potential impacts identified above having due regard to those matters, and the paragraphs below.
- 3.17 As is identified at paragraph 2.3 above, it is considered that the fares revision proposed in the Mayoral Decision is the most effective way of delivering fares that are as affordable as possible, and fair and equitable for customers; that will enable TfL continue to be run in a manner that is financially sustainable; and that will secure sufficient government funding for required capital investment and major capital projects enabling TfL to deliver on other priorities that underpin its Business Plan, and which support the delivery of the Mayor's Transport Strategy.
- 3.18 While the proposed increase in tube and rail fares is likely to negatively impact those using or reliant those services, it is the lowest increase possible that will allow TfL to deliver on these matters, while freezing bus and tram fares and preserving all concessions; and thereby facilitating continued access to TfL public transport network for those, including those from protected groups, most in need or on low incomes who are more likely to use the bus.
- 3.19 The equality impacts of the zonal fares system ("ZFS") TfL uses to charge customers fares for using its Tube and rail network have also been assessed. This is assessment is contained in Annex 1, and is entitled: Equality Impact Assessment TfL Zonal Fares System.
- 3.20 The outcome of that assessment can be summarised as follows: assessing the impacts of the ZFS on those with protected characteristics with specificity is extremely difficult given the different combinations of zones that any given customer may travel through for different reasons. However, on the basis of the assessment undertaken, it is possible that some protected groups might be more negatively impacted than others by the ZFS; and that this is probably likely to be white adult men of working age in employment. Notwithstanding this (and noting that any impact will be specific to individual customers depending on their personal circumstances and use of the TfL network), it is considered that any disproportionate impacts and or disadvantage are justified as a proportionate means of achieving legitimate aims.
- 3.21 The ZFS is considered to be a fair, equitable, proportionate means of charging customers for using the TfL Tube and rail networks.

4. Links to Strategies

4.1 The Mayor's Transport Strategy highlights the importance of improving transport accessibility for all Londoners. Part of this is ensuring that the costs of transport remain affordable. These fares proposals will promote the use of London's public transport facilities and services by balancing the need to maintain quality of services through ongoing investment, while providing affordable bus travel and limiting the scale of increase as much as possible. All existing TfL concessions and discounts remain in place to support those most likely to have lower incomes who have protected characteristics, or are from low-income households, when travelling in London.

5 Fares Revenue

5.1 There are no direct financial implications arising from this decision to the GLA.

- 5.2 TfL's 2025-26 GLA Budget submission was made on 22 November 2024. It included a planning assumption to increase fares in March 2025 of 3.6 per cent, on fares controlled by the Mayor and Travelcard fares, and the associated PAYG caps to increase by 4.6 per cent reflecting NR fares policy announced on 30 October 2024 over which the Mayor has no control.
- The proposal is (subject to the Mayor's approval) to freeze fares on buses and to increase fares on tube and rail services which are set by the Mayor by 4.6 per cent.
- Table 5 summarises the revenue yields for TfL based on 2025-26 forecasted demand as of December 2024. It assumes that fares and prices rise by an average of 3.6 per cent; this is the net impact of bus fares being frozen, and all other fares and prices increasing by 4.6 per cent. In addition to these changes, TfL's 2025-26 GLA Budget submission assumes increases to income from continued growth in passenger journeys. The changes to fares have been applied to the 2025-26 forecasted demand and the values represent the potential revenue generation from the fares increase.

Table 5: Revenue yields from the 2 March 2025 fare changes (£m per annum) on 2025-26 forecasted demand

	Bus yield	Tube yield	Rail yield	Elizabeth Line yield	Total yield
Cash fares	0	0	0	0	0
PAYG (incl. capping)	4	116	23	45	188
Off-peak day travelcards	0	3	0	1	4
Anytime day travelcards	0	1	0	0	2
Bus & Tram Pass season tickets	0	0	0	0	0
Travelcard season tickets	5	9	2	3	18
Total yield	9	129	25	48	211

Note: Totals may not match sum of individual figures due to rounding

All existing concessions will be maintained and are funded in the TfL 2024-25 Budget until the end of the current financial year, and are included in the TfL 2025-26 GLA Budget submission for 2025-26 until the TfL 2025-26 Budget is approved by the Board in March 2025. This includes the travel concessions for under 18s (on buses and trams) and the 60+ Oystercard which since 2021-22 have been partly funded from a £15 uplift to the Mayor's council tax precept.

Annex 1

Equality impact assessment: TfL Zonal Fares System

Introduction

- 1.1 A zonal fares system (ZFS) has been in existence on the Tube since the 1980s and, since 2008, has also been used by National Rail train operators running services in London, after the government at the time made this a condition of their operating franchises in order to enable Oyster pay as you go (PAYG) to be rolled out across National Rail in London, to simplify the then complex system of individually priced station-to-station fares, and facilitate seamless and integrated travel across networks. There are nine zones (Zones 1 9) comprising TfL's zonal structure, but the substantial majority of the TfL Tube and rail network fall within Zones 1-6.
- 1.2 Further to the public sector equality duty⁹, the equality impacts of the ZFS TfL uses to charge customers fares for using its Tube and rail networks ("**the TfL Tube and rail network**") have been assessed.
- 1.3 The assessment focuses on adult PAYG single fares that are payable under the ZFS.
- 1.4 Adult PAYG fares under the ZFS can generally be summarised as follows¹⁰. There is a set fare for travel within each zone. This fare is the same for all zones except Zone 1. Travel within Zone 1 is charged at a premium and more expensive. For travel across zones, the fare increases with the number of zones travelled in but, with the exception of travel involving Zone1, travel across a given number of zones is the same irrespective of which actual zones are involved. Daily and weekly caps apply to PAYG fares, limiting the maximum amount that a customer can be charged in a day or week. As with single fares, the price of the caps increases with the number of zones covered, with a premium paid for Zone 1. There are no non-Zone 1 variants of daily caps.
- 1.5 The assessment focuses on adult PAYG single fares because they constitute the vast majority (approximately 80%) of journeys are made of the TfL Tube and rail network; the ZFS is not relevant to cash fares, which are charged a flat fee, or concessions that provide free travel on the TfL Tube and rail network; and the ZFS is not relevant to child PAYG fares, which are charged at a flat fee. Although the ZFS is relevant to Travelcard prices, there are a range of Travelcard products including Travelcards that are added to National Rail tickets for travel from an originating station outside of London which makes assessment problematic. Given this, their limited use compared to PAYG, and the fact that some of the broad conclusions of the assessment of the impact of the zonal structure are likely relevant to Travelcards (because, like PAYG, Travelcard prices increase with the number of zones in which they permit travel), it is not considered necessary or appropriate to focus on Travelcards with the assessment.
- 1.6 The assessment of equality impacts has been undertaken using population data from the 2021 Census allocated and aggregated to TfL fare zones, and also using data extracted

⁹ The Mayor of London and TfL have also both received identical letters asserting that the ZFS indirectly discriminates against BAME individuals because the are more likely to live or work in zones 3-5.

¹⁰ This summary describes adult PAYG fares in Zones 1-6. Fares for zones 7-9 are very slightly different.

from the London Travel Demand Survey 2023/24 as to trip purposes by Protected Groups to, from and within central, inner and outer London.

Population data from the 2021 Census allocated and aggregate to TfL fare zones

Age:

- 2.1 <u>15 and under</u>: The lowest proportion of this group reside in zone 1, followed by zone 2. The proportions of this group residing in zones 3,4,5 and 6 are broadly the same. <u>16-64</u>: This group covers a wider age range and so is the vast majority of residents in all zones. Within this age group, the highest proportion reside in zone 1, followed by zones 2, 3, 4, 5 and 6 respectively.
- 2.2 <u>65 and over</u>: There are broadly similar proportions of this age group residing in zones 1,2, and 3. The proportions of this age group residing in zones 1-3, are less than the proportions residing in zones 4-6 with the highest proportion residing in zone 6, followed by zone 5 and then 4.

Disability:

2.3 The proportions of disabled people/non-disabled people residing in each of the six zones is broadly similar, the proportion of residents with a disability is slightly lower in zones 3-5 and marginally the highest in zone 6.

Religion:

2.4 The majority residing in all zones are Christian and those with no religion. The proportions of Christians residing in zones 1,2,3 and 4 is broadly the same. It is slightly higher in zone 5 and then slightly higher still in zone 6. In terms of other religions, the notable points are that higher proportions of Hindus live in zones 4 and 5 compared to other zones. The lowest proportions of Jewish people live in zone 6 out of all the zones. Out of all the zones, higher proportions of Muslims live in zones 1, 2, 3 and 4 and, with the exception of Christians, are the highest proportion of all religions to reside in those zones. The highest proportions of Sikhs reside in zones 4 and 5; whereas for Buddhists this is zone 1.

Race:

2.5 The majority of residents in zone 4 are BAME. For each of the other zones, the majority of residents are White – particularly in zone 6 where there is a significant majority. On average, there is a majority of White people residing in Zones 1-2, as well as in Zones 3-6. The highest proportion of White people reside in zones 1-2 and 6. The highest proportion of BAME people live in zones 3-5.

Sex:

2.6 Women are the majority of residents in each of all the zones. The proportions within each zone are broadly similar. The proportions of women compared to men in each zone is also broadly similar.

Analysis of data extracted from the London Travel Demand Survey 2023/24 on trip purposes central/inner/outer London by Protected Groups

3.1 Some key points of an analysis of data extracted from the London Travel Demand Survey (LTDS) 2023/24 (showing trips by inner/outer London residents by the protected characteristics available (age/sex/ethnicity and disability), by origin/destination for the purposes of commuting, shopping and leisure are as follows:

<u>Age:</u>

- 3.2 Inner London: The 16-64 year old population of Inner London make more trips to/from central London for work/shopping/personal business/leisure compared with the over 65s population of Inner London. However, the over 65s population of Inner London make more trips within Inner London for work/shopping/personal business/leisure compared with the 16-64 year old population of Inner London. For both groups in Inner London, the majority of shopping/leisure trips are wholly within Inner London.
- 3.3 Outer London: The 16-64 year old population of Outer London make more trips to/from central London for work/shopping/personal business/leisure compared with the over 65s population of Outer London. However, the over 65s population of Outer London make more trips within Outer London for work/shopping/personal business/leisure compared with the 16-64 year old population of Outer London. For both groups, the majority of all such trips are wholly within Outer London.

Disability:

- 3.4 Inner London: The Non-Disabled population of Inner London make more trips to/from central London for work/shopping/personal business compared with the Disabled population of Inner London. A majority of trips of the Non-Disabled population to/from central London are for work. However, the Disabled population of Inner London make more trips to/from central London for leisure compared with the Non-Disabled population of Inner London. In addition, the Disabled population of Inner London make more trips (and a majority of trips) within Inner London for work/shopping/personal business/leisure compared to the Non-Disabled population.
- 3.5 Outer London: The Non-Disabled population of Outer London make more trips to/from central London for work/shopping/personal business and leisure compared with the Disabled population of Outer London. In addition, the Disabled population of Outer London make more trips (and a majority of trips) within Outer London for work/shopping/personal business/leisure compared to the Non-Disabled population.

Race:

3.6 Inner London: The White population of Inner London make more trips to/from central London for work/shopping/personal business/leisure compared with the BAME population of Inner London. A majority of trips of the White population to/from central London are for work and are also for leisure. However, the BAME population of Inner London make more trips within Inner London for work/shopping/personal business/leisure compared to the White population.

3.7 Outer London: The White population of Outer London make more trips to/from central London for work/shopping/personal business/leisure compared with the BAME population of Outer London. However, the BAME population of Outer London make more trips within Outer London for work and leisure compared to the White population. The White population of Outer London make more trips within Outer London for shopping/personal business compared to the BAME population. For both groups in Outer London, the majority of shopping/leisure trips are wholly within Outer London.

Sex:

- 3.8 Inner London: The Male population of Inner London make more trips to/from central London for work/shopping/personal business/leisure compared with the Female population of Inner London. A majority of trips of the Male population to/from central London are for work. However, the Female population of Inner London make more trips within Inner London for work/shopping/personal business compared to the Male population (for leisure the proportions are the same). For both groups in Inner London, the majority of shopping/leisure trips are wholly within Inner London.
- 3.9 Outer London: The Male population of Outer London make more trips to/from central London for work and leisure compared with the Female population of Outer London. However, the Female population of Outer London make more trips to/from central London for shopping/personal business compared with the Male population of Outer London. The Female population of Outer London make more trips within Outer London for work and leisure. However, the Male population of Outer London make more trips within Outer London for shopping / personal business than the Female population of Outer London. The majority of all trips for both groups residing in Outer London are wholly within Outer London.
- 3.10 All of the Protected Groups in Outer London make fewer trips to central London across all purposes. The most common reason for most Outer London residents to travel to central London is for work purposes (59% of all trips).

Consideration of impacts, mitigations and justification

- 4.1 The ZFS charges a premium for travel within Zone 1 (for within zone travel) compared to the other zones. For example, the adult single PAYG fare for travel within Zone 1 is £2.80 (peak) and £2.70 (off peak), but the adult single PAYG fare for travel within each of the other separate zones is: £1.90 (peak) and £1.80 (off-peak)¹¹. The ZFS also charges customers more the more zones they travel through. The most expensive being a journey from Zone 1 to 9.
- 4.2 Given this, it is possible, depending on the population distribution of Protected Groups within the zones of the ZFS and their use of the TfL Tube and rail network, that some may have to pay higher fares than others for that use of the system. As can be seen from above, the picture is a complex one and assessing the impacts of the ZFS with specificity is

¹¹ This is based on current fares. From March 2025 adult single PAYG fare for travel within Zone 1 will £2.90 (peak) and £2.80 (off peak). The adult single PAYG fare for travel within each of the other separate zones (2,3,4,5,6) will be: £2.10 (peak) and £2.00 (off-peak).

extremely difficult given the different combinations of zones that any given customer may travel through for different reasons, but the following observations can be made.

Age:

- 4.3 Within the 16-64 year old group, the highest proportion reside in zone 1, followed by zones 2, 3, 4, 5 and 6 respectively. In addition, the 16-64 year old population of Inner London make more trips to/from central London for work/shopping/personal business/leisure compared with the over 65s population of Inner London. On this basis, it is likely that the 16-64 year old group are more likely to be negatively impacted than other age groups by the ZFS to the extent that travel within Zone 1 is concerned.
- 4.4 Although, there are higher proportions of both under 16s and over 65s in zones 3-5, with the highest proportion of over 65s in zone 6, for both of these age groups, there is less travel to/from central London for the main purposes of travel identified above from the LTDS 2023/24 than the 16-64 population. This suggests that they are not disproportionately affected by the higher fares applicable for travel from those zones to zone 1, and that the 16-64 year old group may be more likely to be negatively impacted than other age groups by the ZFS to the extent that travel to/from zones 1 from outside that zone is concerned.
- 4.5 This is supported by the fact that Londoners aged under 11 and over 60 are eligible for free travel across all TfL modes (excluding before 9am on weekdays for over 60s); 16-17 year old Londoners in full time education are eligible for a 50% discount from adult PAYG fares on the TfL network (except on the Elizabeth line between West Drayton and Reading) and most National Rail services in London fares on the TfL Tube and rail network (and free travel on its buses and trams). In addition, eligible London students over 18 are entitled to a 30% discount on adult-rate Travelcards and Bus & Tram Pass season tickets.
- 4.6 The Job Centre Plus Travel Discount also provides a 50% discount from PAYG adult fares on the TfL network (except on the Elizabeth line between West Drayton and Reading) and most National Rail services in London for those claiming Jobseekers allowance or Universal Credit aged between 18-24 and unemployed for 13-39 weeks, or aged 25 or over and unemployed for 13-52 weeks; on Incapacity Benefit, Employment and Support Allowance or Income Support and actively engaged with an adviser in returning to employment.
- 4.7 In view of the above, those 16-64 year olds in employment may be the most negatively impacted by the ZFS.

Disability:

- 4.8 Given that the proportion of residents reporting a disability is broadly similar across all areas of London, with only slight or marginal differences across zones, and given that the proportion of residents with a disability make fewer trips to/from central London for commuting, shopping and personal business purposes, it is unlikely that disabled people are significantly or disproportionately impacted by the ZFS.
- 4.9 In addition, potential impacts for the most severely disabled are mitigated by the Disabled Person's Freedom pass, which provides free travel on the entire TfL network at all times for

eligible Londoners; although there are likely to be more people identifying as disabled on the census than are eligible for a Disabled Person's Freedom Pass.

Race and Ethnicity:

- 4.10 There is a higher proportion of White residents in Zone 1 than BAME residents. In addition, the White population of Inner London make more trips to/from central London for work/shopping/personal business/leisure compared with the BAME population of Inner London. On this basis, it is reasonably likely that the White population of zone 1 is more likely to have to pay the higher fares that are applicable for within zone travel (within Zone 1) than the BAME population of zone 1. In addition, there is a higher proportion of White residents in Zone 6 than BAME residents and the White population of Outer London make more trips to/from central London for work/shopping/personal business/leisure compared with the BAME population of Outer London. On this basis, it is reasonably likely that the White population of zone 6 is more likely to have to pay the higher fares that are applicable for travelling from zone 6 to zone 1 than the BAME population of zone 6.
- 4.11 Although the highest proportion of BAME people live in zones 3-5, the BAME population of Outer London make fewer trips to/from central London for work/ shopping/personal business/leisure compared to the White population. The BAME population of Outer London also make more trips for work and leisure within Outer London compared to the White population. On this basis, it is reasonably likely that BAME population of zones 3-5 are less likely to incur the higher fares for travel into zone 1; are more likely to pay the lower fares that apply outside of that zone (1); and are unlikely to be disproportionately impacted by the fact that the zonal fares system charges a customer more the more zones they travel through; including a premium into zone 1.
- 4.12 On the basis set out above, the White population of London would be more likely to be negatively impacted than BAME population by the ZFS, particularly to the extent that travel within Zone 1 or travel to/from Zone 1 6 is concerned. However, although the highest proportion of BAME people live in Zones 3-5, and the BAME population of Outer London make fewer trips to/from central London for work/shopping/personal business/leisure compared to the White population, to the extent that travel to/from Zone 1 Zones 3-5 is concerned, that travel would be more expensive compared to travel within Zone 1; and so those making those journeys would be more negatively impacted than those travelling within Zone 1, but less negatively impacted than those travelling to from Zone 1 Zones 6-9.

Religion:

- 4.13 The proportion of people who stated in the LTDS 2023/24 that they have a religious affiliation is higher in zones 3-5 than in other areas of London. Residents of zones 1 and 2 have the lowest level of religious affiliation.
- 4.14 According to the LTDS 2023/24, the majority of travel for religious purposes is local, with 83 per cent of trips by inner London residents for worship wholly within inner London, and 89 per cent of trips by Outer London residents for worship wholly within Outer London. Fewer than five per cent of all trips for worship purposes are to/from central London,

therefore these trips are unlikely to be disproportionately affected by the impact of the ZFS.

Sex:

- 4.15 Across all areas of London, the proportion of men and women is broadly similar, which suggests that the impact of TfL's fare policy does not disproportionately affect either group. The female population is higher across all areas of London.
- 4.16 Across the main purposes of travel identified above from the LTDS 2023/24, men are more likely to travel to/from central London than women, and so are more likely to be affected by the higher zone 1 fares. The only exception is for shopping and personal business trips by female residents of outer London, although at four per cent this is a small number of trips in this category.
- 4.17 On the basis set out above, the male population of London would be more likely to be negatively impacted than the female population by the ZFS.

Justification:

- 5.1 As is identified above, assessing the impacts of the ZFS with specificity is extremely difficult given the different combinations of zones that any given customer may travel through for different reasons. However, on the basis of the assessment above, it is possible that some Protected Groups might be more negatively impacted than others by the ZFS; and that this is probably likely to be white adult men of working age in employment. Notwithstanding this (and noting that any impact will be specific to individual customers depending on their personal circumstances and use of the TfL network), it is considered that any disproportionate impacts and or disadvantage are justified as a proportionate means of achieving legitimate aims.
- 5.2 Firstly, the ZFS is considered to be a fair, equitable, proportionate and appropriate means of charging customers for using the TfL Tube and rail network.
- 5.3 The fares that are charged under the ZFS are broadly reflective of the cost of a customer's use of the system. The fares structure broadly reflects the position that the further a customer travels on the network the more they will pay. This is considered a fair, and entirely reasonable basis upon which to charge fares, which is consistent with how fares are generally charged on national rail services.
- 5.4 Furthermore, under the ZFS, prices only increase in small increments depending on how many zones are travelled in; ensuring that, while customers are charged more the more they use the network, the charge is proportionate to their use and incentivises travel in all zones and throughout London. A flat fee structure might incentivise some longer distance travel but, to generate similar levels of income as the ZFS, a flat fee structure would significantly increase the cost of many short or shorter journeys, making them disproportionately and unfairly expensive relative to customer use of the network; disincentivising public transport use.

- 5.5 In addition, in the absence of zones, it would not be possible to offer Day and Season Travelcard tickets and Daily and 7 day caps on PAYG, which facilitate seamless and integrated travel across the different networks in London. Customers would instead be limited to point-to-point season tickets, as on NR, or London would be need to be priced as a single Travelcard/cap price, which would significantly increase the cost of travel for customers travelling in smaller numbers of zones, especially for non-Zone 1 travellers, making them disproportionately and unfairly expensive relative to customer use of the network; disincentivising public transport use.
- 5.6 Secondly, TfL's ZFS has been used by national rail train operators running services in London since 2008, after the government at the time made this a condition of their operating franchises in order to enable Oyster PAYG to be rolled out across national rail in London, to simplify the then complex system of individually priced station-to-station fares, and facilitate seamless and integrated travel across networks. The ZFS is integral to the acceptance of Oyster and PAYG on TfL and national rail services in London, and is also integral to Day and Season Travelcard tickets and Daily and 7 day caps on PAYG (which also facilitate seamless and integrated travel across the different networks in London).
- 5.7 Thirdly, the ZFS is a clear and understandable way of applying charges across the vast network of TfL's tube and rail services, which covers the whole of Greater London and, in parts, beyond; comprising numerous different lines and in the region of 450 stations; and which interlinks with NR services in London that also use the same zonal fares system. The zones make understanding fares much simpler than the previous system where point-to-point fares applied to travel between each pair of stations on the network.
- 5.8 Fourthly, the ZFS also enables fares in Zone 1 to be charged at a premium, to help manage capacity there and reflecting the fact that there is more demand to travel in this zone, and that the costs of providing and maintaining the network in that zone are the most expensive.
- 5.9 Finally, the ZFS has been in place for in excess of 40 years, is well understood, and is supported by technology, hardware, information systems and complex contractual arrangements that are not just operated by or involve TfL but also the NR services in London, all of which use and accept TfL's PAYG Oyster and contactless tickets, as well as Travelcard products, within the London zones and which use charging and revenue apportionment methodologies based on the TfL ZFS. It would be extremely expensive, time consuming and disruptive to change this system now and in the foreseeable future.