GREATER**LONDON**AUTHORITY

REQUEST FOR MAYORAL DECISION – MD3442

Title: Changes to the Congestion Charging Scheme

Executive summary:

The Congestion Charge has been in place for over two decades, helping to manage traffic and congestion in central London. With an increasing number of people driving electric vehicles, there has been a longstanding plan in place to end the 100% Cleaner Vehicle Discount for electric vehicles in December 2025. However, in order to continue incentivising the switch to electric vehicles, the Mayor requested that TfL develop options to provide ongoing support for the cleanest cars, vans, quadricycles and HGVs, which would mean they would continue to receive a discount.

TfL has consulted with the public and stakeholders on introducing a new tiered system of discounts for electric vehicles registered for Auto Pay. The proposals include a 50 per cent discount for electric vans, quadricycles and HGVs, and a 25 per cent discount for electric cars. These proposed changes seek to strike the right balance between continuing to support the transition to electric vehicles while ensuring that the Congestion Charge remains effective at managing congestion within central London and furthering the aims of the Mayor's Transport Strategy (MTS). TfL also consulted on the level of the Congestion Charge increasing from £15 to £18 and changes to the Residents' Discount. Without these proposed changes, TfL has estimated that there would be over two thousand more vehicles driving in the Congestion Charge zone on an average day. Feedback was also sought on a draft revision to the guidance issued by the Mayor to TfL regarding the discharge of its road user charging functions (Mayoral Guidance). TfL prepared and consulted on this draft revision following the Mayor's request (in Mayoral Decision MD3383).

The consultation ran for 11 weeks between 27 May and 11 August 2025 (including a one-week extension). A total of 4,561 responses were received. TfL has analysed these responses and considered all issues raised in a Report to the Mayor (Appendix 1). The Mayor is now asked to decide whether the proposed changes should be implemented with the post-consultation modifications recommended by TfL, and whether the revision to the Mayoral Guidance should be issued.

Decision:

That the Mayor:

a) confirms the Greater London (Central Zone) Congestion Charging (Variation) Order 2025 (Appendix 2) with the modifications recommended by TfL by signing and dating the Greater London (Central Zone) Congestion Charging (Variation) Order 2025 Instrument of Confirmation (Appendix 3) having considered:
   a. the responses to the consultation, TfL's Report to the Mayor on the consultation (Appendix 1) and the updated Integrated Impact Assessment (IIA) (appended to that Report)
   b. the content of and advice given in this form, in particular regarding the various matters for decision, including whether further information is required before making a decision and whether further consultation or the holding of any inquiry, public or otherwise, is necessary or appropriate before making a decision

b) issues the revision to the Mayoral Guidance (Appendix 4) to TfL pursuant to paragraph 34 of Schedule 23 to the Greater London Authority Act 1999 having considered the responses to the consultation and TfL's Report to the Mayor on the consultation (Appendix 1), in particular the section in Chapter 5 on Changes to the Mayoral Guidance.

Mayor of London

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature: **Date:** 11/11/25

PART I – NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR

Decision required – supporting report

1. Introduction and background

1.1. The Congestion Charge was a world-leading road user charging scheme when it was first introduced over 20 years ago. It continues to be an essential tool for influencing the way people travel in central London. Further information about the scheme's history is set out in section 2.2 of the Report to the Mayor (Appendix 1).

1.2. The Congestion Charge operates in a 21km^2 area of central London between 7am to 6pm Monday to Friday, and 12 noon to 6pm on Saturday and Sunday and bank holidays. There is no charge between Christmas Day and New Year's Day bank holiday (inclusive). A non-chargeable diversionary route goes around the Congestion Charging Zone (CCZ) and signage gives drivers advance warning of the CCZ.

1.3. The objective of the Congestion Charging scheme is to reduce traffic and congestion within the CCZ. The charge acts as a disincentive to driving in the CCZ, and the scheme plays a role in delivering the policies and proposals of the Mayor's Transport Strategy (MTS). Lower levels of traffic improve conditions for people walking and cycling and increase the speed and reliability of bus journeys. A shift from car use to sustainable modes contributes to more efficient use of the streets in central London for essential traffic, reducing the negative economic impacts of congestion. The scheme also has secondary benefits for other MTS outcomes in central London including reducing toxic air pollution and carbon emissions, and reducing road danger.

1.4. The MTS outlines that since the introduction of the Congestion Charging scheme, the challenges facing central London have changed. It commits the Mayor and TfL to keeping the scheme under review in order to ensure it remains fit for purpose, as set out in Proposal 20:

The Mayor, through TfL, will keep existing and planned road user charging schemes, including the Congestion Charge, Low Emission Zone, Ultra Low Emission Zone and the Silvertown Tunnel schemes, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy.

1.5. In accordance with Proposal 20, TfL continually monitors the number of vehicles being driven in the CCZ, including characteristics such as the vehicle type, how and when they are used, the mix of fuel types, and the number of uncharged vehicles.[1]

1.6. There has always been a 'green discount' for the Congestion Charge to provide an incentive for people who drive in the zone to do so in the least polluting vehicles. While the primary objective of the Congestion Charging scheme is to manage traffic and congestion in central London, the scheme can also be used to help achieve secondary objectives, such as reducing air pollution and carbon emissions from road transport.

1.7. The criteria for this discount have tightened over time, enabling TfL to balance the need to encourage the use of the cleanest vehicles with the need to manage traffic and congestion in central London. Since 2003, the 100 per cent 'green discount' criteria have been tightened three times. Following their implementation, these changes led to short-term reductions in the number of vehicles registered for it; however, the general trend is an increase in registered vehicles over the lifetime of the discount. This is to be expected as the range of affordable low emission or electric vehicles available expands, as well as in response to the discount.

1.8. The most recent version was introduced in 2019 and is known as the Cleaner Vehicle Discount (CVD). It has three phases:

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[1] Certain vehicles such as TfL buses, vehicles with nine+ seats, taxis and motorcycles are exempt from the Congestion Charge. For a full list of discounts and exemptions, see: https://tfl.gov.uk/modes/driving/discounts-and-exemptions

- Zero Emission Capable from April 2019
- EVs, including battery electric vehicles (BEVs) which have no combustion engine, and hydrogen (H2) fuel cell electric, which have no air pollutant or carbon emissions at the tailpipe, only from October 2021
- CVD to cease to be offered from 25 December 2025.

1.9. As set out in the Mayoral decision (MD 2397)[2] which introduced the current CVD and in the Congestion Charge Scheme Order, this discount is due to end on 25 December 2025. The Mayoral decision was made and announced in December 2018 giving drivers and vehicle owners seven years' advance notice of the phased approach to the discount and its eventual withdrawal date.

1.10. However, in order to continue incentivising the switch to electric vehicles, the Mayor requested that TfL develop options to provide ongoing support for the cleanest cars, vans, quadricycles and HGVs which would mean the cleanest cars, vans, quadricycles and HGVs would continue to receive a discount.

1.11. TfL, as the charging authority of the scheme, has developed the following three proposed changes to the scheme rules (the Proposed Changes) which are intended to ensure that the scheme remains effective in managing traffic and congestion in central London while contributing to the achievement of the objectives of the MTS:

- Proposal A: an increase to the Congestion Charge from £15 to £18 – a lower than inflation increase and the first increase since 2020.
- Proposal B: a new Cleaner Vehicle Discount (CVD) for electric vehicles (EVs) so instead of paying the full charge from 2 January 2026, EVs would now get a 50 per cent or 25 per cent discount depending on vehicle type.
- Proposal C: changes to the vehicle eligibility criteria of the Residents' Discount for new applicants to support residents in switching to EVs.

1.12. On 20 May 2025, TfL made the Greater London (Central Zone) Congestion Charging (Variation) Order 2025 (the 2025 Variation Order; Appendix 2), which contains the amendments to the Central London Congestion Charging Scheme Order 2004 (the Scheme Order) that are needed in order to give effect to the Proposed Changes.

1.13. Separately, the Mayor asked TfL (in MD3383) to review the guidance the Mayor has issued regarding the exercise of TfL's road user charging functions (the Mayoral Guidance) including the procedures which apply when establishing, changing or revoking a scheme. TfL is required to have regard to the Mayoral Guidance when exercising its road user charging functions. The purpose of the review was to consider whether any amendments could be made to the Mayoral Guidance which would better reflect the approach TfL follows when undertaking consultations in comparable circumstances and when setting charges for other TfL services. Following this review, TfL prepared a draft revision to the Mayoral Guidance.

1.14. Members of the public and stakeholders were invited to give their views on both the Proposed Changes and the draft revision to the Mayoral Guidance in a consultation which was held over an 11-week period between 27 May and 11 August 2025.

1.15. A total of 4,561 responses were received including 99 responses from stakeholders, such as London boroughs or business organisations. The Report to the Mayor (Appendix 1) describes how the consultation was carried out, summarises and provides analysis of the consultation responses and

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[2] Mayoral Decision (MD) 2397 https://www.london.gov.uk/decisions/md2397-amendments-congestion-charge-and-ultra-low-emission-zone

TfL's responses to the issues raised, and makes recommendations to the Mayor as to how to proceed. The individual consultation responses have also been made available to the Mayor for his consideration.

1.16. As a consequence of consultation feedback, TfL has developed two modifications to help further support residents who may be less able to afford or access an EV but may require a vehicle to travel as a resident of the CCZ. The modifications are described further on in this section and in section 4 and in section 6 of the Report to the Mayor (Appendix 1).

1.17. TfL recommends that the Mayor confirms the Proposed Changes, with the recommended post-consultation modifications, and issues the revision to the Mayoral Guidance.

Option development and assessment of the Congestion Charge Proposed Changes

1.18. In developing the Proposed Changes, TfL assessed a range of potential options against their effectiveness in achieving the primary objective of the Congestion Charge: traffic and congestion reduction in support of policies and proposals of the MTS. This has secondary benefits for other MTS outcomes including reducing toxic air pollution and carbon emissions, reducing road danger and promoting the efficient movement of buses in central London.

1.19. The baseline against which the impacts of the Proposed Changes were assessed was a 'Do Nothing' scenario. In this 'Do Nothing' scenario the charge stays at its current level of £15 and the existing CVD, a 100 per cent discount for EVs, ends on 25 December 2025 as stated in the Congestion Charging scheme's rules contained in the Scheme Order.

1.20. The expected impacts of the package of Proposed Changes on traffic and emissions are set out in section 5.2 of the IIA (appended to the Report to the Mayor (Appendix 1)). On an average weekday during the first year of implementation (2026), the expected impact of the Proposed Changes across all assessed modes during charging hours (7am-6pm) results in approximately 2,200 fewer vehicles per day. The estimated traffic benefits are slightly greater in terms of vehicle numbers in 2030 with the introduction of the second phase of the proposed new CVD, with a reduction of approximately 2,600 vehicles per day. With an increase in the number of EVs in circulation over time, we expect the traffic benefits of the Proposed Changes combined to decline, with approximately 1,700 fewer vehicles per day from 2035. However, all assessment years show a reduction in vehicle numbers in the CCZ on an average charging day during charging hours, compared to the 'Do Nothing' scenario.

1.21. In the course of developing the Proposed Changes, the option of a 100 per cent discount for EVs was ruled out because it was not considered to be compatible with the Congestion Charging scheme's objectives based on the current number of EVs seen in the CCZ, with historical trends indicating that this would continue to increase. A 100 per cent discount for EVs would undermine the deterrent effect of the scheme, encouraging more vehicle entries and contributing to worsening traffic.

1.22. As described in section 4 'Updates during the consultation period' below, TfL issued a supplementary note which addressed a hypothetical scenario where the CVD continued as a 100 per cent discount in response to a request for information made under the Environmental Information Regulations 2004. However, it was made clear that the additional information did not affect the Proposed Changes that were being consulted on.

Development of proposed modifications and mitigations

1.23. In respect of Proposal C, certain stakeholders raised concerns during consultation regarding the potential impacts of the proposed changes to the Residents' Discount on low income and disabled residents of the CCZ. As such, TfL has developed two mitigations (A and B below) to address these concerns. The modifications are summarised below and described in detail in section 4.

1.24. Both mitigations require changes to the Scheme Order and would be implemented by way of modifications to the 2025 Variation Order.

1.25. These additional mitigations have been reflected within the IIA where relevant.

1.26. It is not considered that these modifications, which are limited in scope, would have a material impact on the analysis already undertaken.

Modification A

1.27. TfL is recommending that the current vehicle eligibility criteria to qualify for the Residents' Discount should continue to apply to new applicants in receipt of certain benefits (including low-income) for an extended period. The modification would mean these residents need not have an EV in order to qualify for the Residents' Discount between 1 March 2027 and 3 March 2030 and will receive 'grandparent rights' going forward if they qualify for the Residents' Discount during this period.

Modification B

1.28. A specific new 100 per cent discount for back to base car club[3] EVs based in bays in the Residents' Discount zone (the CCZ plus a buffer) is recommended as a mitigation to the proposed changes to the Residents' Discount.

2. Objectives and expected outcomes

2.1. The text below is intended as a summary of the Proposed Changes and their rationale. Further information and the relevant background to the Congestion Charging scheme is set out in chapter 2 of the Report to the Mayor (Appendix 1).

<u>Proposal A: Increasing the Congestion Charge from £15 to £18</u>

2.2. The current level of the Congestion charge is £15 (if paid on the day of travel or before), having increased from £11.50 as a temporary measure in June 2020 and then permanently increased to £15 in 2022. There is also an option to pay by midnight of the third day after travelling in the zone, set at £17.50. Previous changes to the charge level, prior to the temporary increase introduced in June 2020, took effect in 2014, when it rose from £10 to £11.50; in 2011, when it rose from £8 to £10; and in 2005, when it rose from £5 to £8.

2.3. The proposal is to increase the charge to £18 (if paid on the day of travel or before), with the pay later option increasing to £21, both a lower increase than inflation (since 2020).[4]

2.4. This proposed increase is considered necessary in order to maintain the deterrent effect of the charge in the context of wider inflation. This increase would help to maintain the traffic management effects of the Congestion Charging scheme in central London and support the other aims of the MTS. The increase in charge level reflects the high value of road space in central London and is forecast to reduce traffic in the CCZ.

2.5. If the Mayor approves this proposal, the change will take effect on 2 January 2026.

<u>Proposal B: A new Cleaner Vehicle Discount (CVD) for Electric Vehicles (EVs) whereby the discount varies by vehicle type</u>

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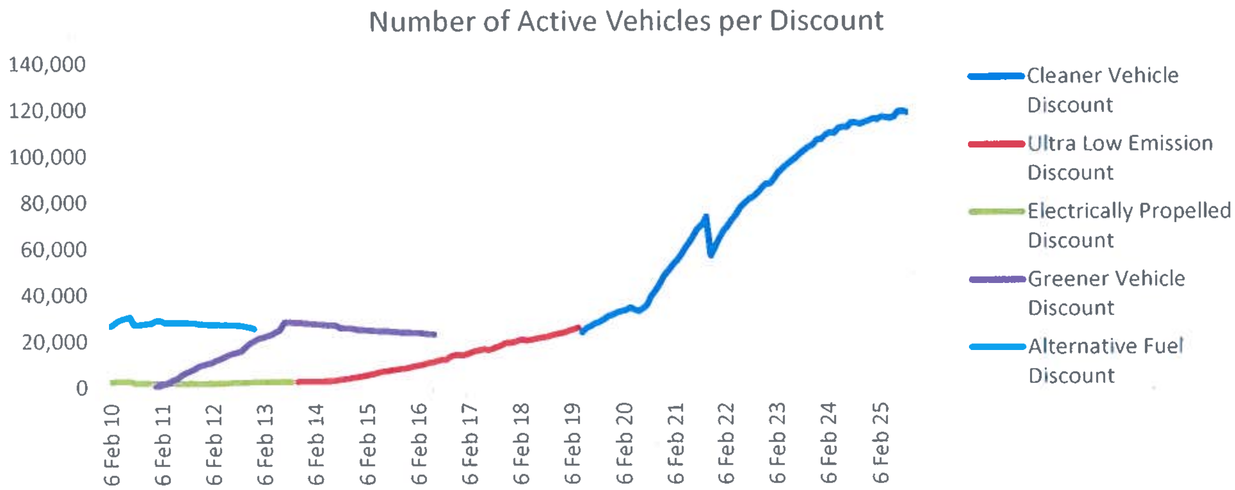
[3] Back to base car club: collecting and returning the vehicle to the same marked bay and often requires a regular membership fee and advanced booking

[4] An increase to £18 in January 2026 is a below inflation increase for the period since the charge was last changed (2020, £15). There are different official measures of inflation, including the Retail Prices Index annual rate (RPI – used to calculate railway fares), the Consumer Prices Index (CPI), and the CPIH which includes owner occupiers' housing costs, among others. The proposed charge level increase is a less than inflation increase regardless of which of these measures is used. It is worth noting that inflation was exceptionally high in 2022 and 2023 (between 10 and 12 per cent RPI). However, an increase from £15 to £18 would equate to an increase of 3.1 per cent each year from 2020 to 2026.

2.6. Following a public and stakeholder consultation in 2018, the Mayor (in Mayor Decision MD2397) introduced the current CVD. The discount has had two phases: from 18 April 2019 – 24 October 2021 it applied to certain Euro 6 hybrid vehicles; and from 25 October 2021 – 24 December 2025 it applies to EVs only. Its withdrawal on 25 December 2025 is specified in the Congestion Charge scheme rules as set out in the Scheme Order. Vehicle owners and drivers have, therefore, had seven years' notice of the closure of the discount later this year.

2.7. The number of vehicles registered for the CVD has risen considerably in recent years (see Figure 1). Around 20,000 vehicles were registered for the discount at the start of 2019, and as of September 2025 there are over 118,000 vehicles registered. While any vehicle in scope for the Congestion Charge can qualify for this discount, the overwhelming majority (91 per cent) are cars.

Figure 1: Number of active vehicles with the CVD in the CCZ to February 2025



2.8. In September 2024, an average of 16,589 unique EVs were seen in the zone during weekday charging hours, out of a total average of 105,168 cars, Private Hire Vehicles (PHVs) and Light Goods Vehicles (LGVs) (15.8 per cent). This is made up of 2,193 electric vans, 7,871 electric cars (excluding PHVs) and 6,525 electric PHVs. The number of EVs in the zone is expected to continue to increase to an estimated 20,300 EVs during charging hours on an average weekday by the end of 2025 when the CVD is due to end.

2.9. On an average day in September 2024 (compared with an average day in September 2022), electric vans have increased from six per cent to nine per cent of all vans captured, electric cars (excluding PHVs) have increased from 10 per cent to 12 per cent of all cars captured, and electric PHVs have increased from 23 per cent to 32 per cent of all PHVs captured.

2.10. The growing number of EVs in the zone means that re-introducing a 100 per cent discount for EVs would undermine the deterrent effect of the scheme, encouraging more vehicle entries and contributing to worsening traffic and congestion.

2.11. However, in order to continue to support further adoption of EVs, the introduction of the new CVD has been proposed. This would provide long-term support for the cleanest vehicles which would otherwise be liable for the full Congestion Charge, recognising their contribution to reducing poor air quality and cutting carbon emissions compared to non-EVs, while ensuring their numbers do not significantly contribute to increased traffic and congestion in the CCZ.

2.12. It is proposed that higher discounts would be available for those vehicle types which, overall, customers may find more difficult to switch to electric and require further support to make the switch. Two phases of changes are proposed, with discounts halving in 2030 as eligible vehicle numbers are expected to continue to increase over time (see

2.13. Table 1).

Table 1: The proposed new CVD

Phase	Starting	Cleaner Vehicle Discount
Phase 1	From 2 January 2026	• 50 per cent discount for electric vans, HGVs, light quadricycles and heavy quadricycles registered for Auto Pay/Fleet Auto Pay • 25 per cent discount for electric cars registered for Auto Pay/Fleet Auto Pay
Phase 2	From 4 March 2030	• 25 per cent discount for electric vans, HGVs, light quadricycles and heavy quadricycles registered for Auto Pay/Fleet Auto Pay • 12.5 per cent discount for electric cars registered for Auto Pay/Fleet Auto Pay

2.14. It is proposed that the new CVD would be available only to customers registered for Auto Pay (or Fleet Auto Pay). Most customers who pay road user charges in London (the Congestion Charge, ULEZ/LEZ, Silvertown and Blackwall tunnels user charges) are already registered for Auto Pay and more than 80 per cent of all Congestion Charge payments are currently made via Auto Pay.

2.15. There is no charge to register for Auto Pay. Unlike the existing CVD, customers would not need to separately register for the proposed new CVD as the discount would be automatically applied if the vehicle associated with the Auto Pay account qualifies (subject to the associated DVLA vehicle record being correct). Auto Pay offers numerous benefits for the customer including removing the risk of incurring a Penalty Charge Notice for non-payment of the Congestion Charge or other road user charging schemes in London. Customers who already have an active Auto Pay account would not need to register again to have the benefit of the proposed new CVD. For TfL, Auto Pay reduces administrative costs and is a more effective payment system.

Proposal C: Changes to the vehicle eligibility criteria of the Residents' Discount for new applicants to support residents in switching to EVs

2.16. Since the introduction of the Congestion Charging scheme in February 2003, a Residents' Discount of 90 per cent has been available. This is in recognition of residents' reduced ability to avoid the charge if they drive in the CCZ; however there is still a small charge payable to recognise the fact that their vehicles contribute to congestion and as an incentive to use more sustainable modes given central London has a very high level of public transport alternatives.

2.17. In order to support the proposed new CVD and the greater availability and uptake of EVs compared to 2003 when the discount was first introduced, eligibility for the 90 per cent Residents' Discount is proposed to be limited to only EVs, starting on 1 March 2027. It is considered appropriate to incentivise those residents who choose to own and use a vehicle in the CCZ to do so in the cleanest vehicle.

2.18. The change to the vehicle eligibility criteria would apply to new applicants only. To mitigate the impact on existing residents who may be reliant on their existing vehicle, no changes are proposed to residents who are already registered for the discount as of 1 March 2027 when the proposed change is due to come into effect. These residents would have the benefit of 'grandparent rights', meaning that they would continue to qualify for the discount regardless of their vehicle's fuel type provided they meet the discount's other eligibility criteria and make timely renewals.

Changes to the Mayoral Guidance

2.19. In May 2025, the Mayor asked TfL to review the Mayoral Guidance regarding user charging functions (in Mayoral Decision MD3383). This Guidance was last revised in 2022 (in Mayoral Decision MD2987).

2.20. Having completed this review, TfL prepared a draft revision to the Guidance (Appendix 4) which was consulted on alongside the Proposed Changes to the scheme. The draft revision provides for:

- the minimum consultation periods which apply when establishing, changing or revoking a scheme as specified in the Guidance to be reduced (typically from 10 weeks to six weeks)

- a new procedure for making routine changes to a scheme without consultation including when increasing charge levels by the same or less than the overall percentage amount by which Tube and TfL railway fares are to be increased in a given year or an annual inflationary rate plus one per cent

- changes which are procedural or administrative in nature to be made without the need for consultation.

2.21. The inflation indicator that is proposed to be used for routine charge level increases is the Retail Prices Index annual rate for July which is the rate that is typically used to calculate railway fares.[5] When the base charge level is increased, all related charge levels, such as the facility to pay within three days and discounted charge levels, would be increased by the same percentage. TfL would be required to give customers reasonable advance notice of the user charge levels and when they would apply from.

2.22. The proposed revision to the Mayoral Guidance would allow for charge levels to be better aligned with Tube and TfL railway passenger fares thus ensuring that the relative difference between the cost of driving in central London and the cost of travelling by train is maintained. It would also support the achievement of the scheme's objectives and, in turn, the sustainable transport mode share aim of the MTS. Where inflation plus one per cent is considered to be a suitable factor by which to increase the user charges, the streamlined procedure would enable the deterrent effect of the charge to be maintained or enhanced and would ensure driving does not become relatively more attractive than taking public transport, enabling the Congestion Charging Scheme to better support mode shift aims. The net proceeds of a road user charging scheme must be applied for a purpose which directly or indirectly facilitates the implementation of any policies or proposals set out in the MTS.

2.23. If the Mayor approves the revision to the Guidance, it will come into effect immediately. However, the changes are procedural in nature and will only be applied by TfL when it is relevant to do so in the future. As the proposed routine charge increase procedure aims to align user charge increases with annual increases to Tube and TfL railway passenger fares, it is anticipated that any routine Congestion Charge level increases would follow a similar timetable to the setting of passenger fares. Passenger fare increases are usually implemented in March every year, with a decision made in the preceding January.

3. Equality comments

3.1. Under section 149 of the Equality Act 2010 (the Equality Act), as public authorities, the Mayor and TfL must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act; and to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not when exercising their functions. This is known as the Public Sector Equality Duty. Protected characteristics under the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status (the duty in respect of this last characteristic is to eliminate unlawful discrimination and other prohibited conduct under the Act only). In line with best practice, the impact on groups who also have

[5] If a different measure of inflation (such as the Consumer Prices Index (CPI) or the Consumer Prices Index including owner occupiers' housing costs (CPIH) has been used to calculate increases to TfL public passenger transport fares or charges for other TfL services, it may be used as an alternative to RPI.

the potential to be socially excluded or are from deprived communities – in this case, people on low incomes, asylum seekers and refugees, carers, and homeless people – have also been considered, notwithstanding that these specific attributes are not protected under the Equality Act but may be common to people with protected characteristics.

3.2. The Public Sector Equality Duty applies to the Mayor's decision whether or not to proceed with implementing the Proposed Changes by confirming the 2025 Variation Order and with issuing the draft revision to the Mayoral Guidance.

3.3. TfL undertook an Integrated Impact Assessment (IIA) on the Proposed Changes, which was published as a draft as part of the consultation. The IIA considers the impacts under three themes: London's economy; London's environment; and People (including Health and Equality). It also identifies mitigation measures to either enhance potential positive effects or minimise negative ones. Information on the baseline used in the IIA is given in Section 1 above.

3.4. The People category includes an assessment of protected characteristic groups, enabling TfL to assess how the Proposed Changes could impact each of these groups. The IIA found that there are anticipated to be some impacts, both positive and negative, to individuals with protected characteristics.

3.5. Following consultation, TfL reviewed and updated the IIA to assess any additional impacts which were raised during consultation where this was considered necessary and to consider how the proposed modifications, if approved, would help to further mitigate the impacts of the Proposed Changes. The updated IIA is appended to the Report to the Mayor (at Appendix C). Full details of the impacts are given in the IIA and are summarised below. Section 4, below, summarises responses made to the consultation which concerned their impacts (including on protected characteristic groups) and the IIA. A summary of the impacts (other than on protected characteristics) is given in Table 2-3 of the Report to the Mayor (reproduced from the IIA).

3.6. The IIA does not assess the potential impacts of the draft revision to the Mayoral Guidance. No impacts arise directly as a consequence of the Mayor issuing the revision to the Mayoral Guidance since the revision itself is concerned with the way in which TfL is expected to exercise its road user charging functions and does not result in any changes to a road user charging scheme itself. An Equality Impact Assessment (EqIA) will be undertaken when the revised guidance is applied in the future, for example, when TfL seeks to make routine user charge increases, and will inform the actions and decisions of TfL and the Mayor at relevant stages. It should, however, be noted that a stakeholder expressed concern about the reduced minimum consultation periods that the draft revision provides for and the impact of this on disabled people who may need additional time to access and consider consultation materials and prepare a response. TfL's response to this issue is addressed in 5.3.37 of the Report to the Mayor (Appendix 1) which the Mayor is asked to specifically take into account when making his decision whether or not to issue the revision to the Mayoral Guidance. TfL does not consider that any other equalities impacts will arise as a consequence of the revision being issued.

Using the IIA to develop and consider the Proposed Changes

3.7. In developing the Proposed Changes, TfL considered the potential impacts as identified by the IIA (including those on groups with protected characteristics), alongside the likely impacts on traffic and congestion, and the other objectives of the MTS. This enabled a consideration in the round of the potential benefits and disbenefits of the Proposed Changes. Additionally, TfL has considered the issues raised by respondents to the consultation, some of which reflect the findings of the updated IIA and some of which raise further issues.

3.8. As outlined above, both positive and negative impacts from the proposed changes have been identified, and potential mitigations have been put forward, including two recommended modifications. Impacts and mitigations are discussed in more detail – and in the context of the responses received to the consultation – in section 4, below.

Age - younger people

3.9. Young people may benefit from reductions in traffic, and subsequent improvements in air quality, road safety and noise (though changes in noise are likely to be largely imperceptible) as a result of the Proposed Changes.

3.10. The impact of the proposed charge level increase for younger people reliant on private modes is considered to be negligible. Existing mitigations include the 100 per cent discount for Blue Badge holders, exemption for vehicles in the disabled tax class, and Residents' Discount (for existing residents).

3.11. Additionally, the recommended modification to provide a 100 per cent discount for back to base car club EVs based in the Residents' Discount zone would act, if approved, as a mitigation helping to reduce the scale of the impact for those living in the CCZ without access to a car in their household who may need to make infrequent car passenger trips.

3.12. Some young people may be reliant on PHVs for access to education facilities, particularly those in Special Educational Needs (SEN) schools. The proposed charge level increase may increase the price of some PHV fares, however the scale of the impact on access to education is considered to be negligible.

3.13. The proposed changes to the Residents' Discount may have a disproportionate negative impact on young people living in the CCZ who are unable to register for the discount prior to March 2027 (if an existing member of their household has not already registered), and may face barriers to having an EV as their first vehicle. However, the impact is minor due to the lower levels of car travel and ownership in the CCZ and range of alternative modes. Furthermore, the recommended modifications for an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030, and 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone would help to further minimise the scale of the impact.

3.14. Minor negative impacts on services provided by community groups and charities may have a disproportionate negative impact on young people reliant on these services.

Age – older people

3.15. Some older people may benefit from reductions in traffic and subsequent minor improvements in air quality and road safety.

3.16. Some older people may be reliant on travel by private vehicle and therefore negatively impacted by the proposed charge level increase. Additionally, they may face barriers to using or owning an EV, which may mean they are disproportionately negatively impacted by the proposed change to the Residents' Discount (if not registered prior to 1 March 2027). The negative impacts are considered to be minor negative, and the recommended modification to provide an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030 will help to further minimise the scale of the impact on older people if approved. Additionally, if approved, the recommended modification to provide a 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone will act as a further mitigation for those who do not own their own vehicle and do not face barriers to EV use.

3.17. There are also a number of existing mitigations in the scheme which may help to minimise these impacts. This includes the 100 per cent discount for Blue Badge holders and exemption for vehicles in the disabled tax class for older people who have mobility challenges, Residents' Discount (for existing residents of the CCZ registered before the proposed changes come into effect), and NHS patient reimbursement (subject to eligibility) for older people requiring access to medical appointments that are unable to travel by alternative modes.

3.18. Identified potential impacts on carers, charities, religious and community groups due to the proposed charge level increase may disproportionately negatively impact older people. This impact is considered to be minor and mitigated by existing discounts and exemptions, including the exemption for vehicles with nine or more seats, the 100 per cent discount for Blue Badge holders, and NHS patient reimbursement (subject to eligibility).

3.19. The potential impact of the proposed charge level increase on PHV fares and availability may have a disproportionately negative impact on older people reliant on them for door-to-door transport. However, this impact is minor and likely to diminish as vehicles are upgraded to electric models. Additionally, alternatives available include taxis and wheelchair-accessible PHVs, which are both exempt, Dial-a-Ride, and some older people may be eligible for the Taxicard scheme helping to offset potential fare increases.

3.20. Some older people may experience digital exclusion and may not be able to access our online systems to set up Auto Pay in order to receive the proposed new CVD. To overcome this, TfL allows customers to contact their call centre to carry out functions such as setting up a discount or Auto Pay and they can send in supporting evidence via post where necessary.

Disability

3.21. Disabled people may benefit from reductions in traffic and consequent improvements in air quality, road safety and noise (though changes in noise are likely to be largely imperceptible, some with a sensitivity to noise may be more sensitive to the change).

3.22. While some disabled people may benefit from the proposed new CVD, some may face barriers to purchasing or accessing EVs, and the proposed charge level increase may have a disproportionately negative impact on disabled people reliant on travel by private vehicle. This impact is considered to be minor due to the existing discounts and exemptions to help support disabled people including the 100 per cent discount for Blue Badge holders, exemption for vehicles in the disabled tax class, NHS patient reimbursement and Residents' Discount (for existing residents and those eligible for the extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030, if the recommended modification is approved).

3.23. Identified potential impacts on carers, charities, religious and community groups due to the proposed charge level increase may disproportionately negatively impact disabled people. This impact is considered to be minor and mitigated by existing discounts and exemptions, including the exemption for vehicles with nine or more seats, the 100 per cent discount for Blue Badge holders, and NHS patient reimbursement (subject to eligibility).

3.24. The potential impact of the proposed charge level increase on PHV fares and availability may have a disproportionately negative impact on disabled people reliant on them for door-to-door transport. However, this impact is minor and likely to diminish as vehicles are upgraded to electric models. Additionally, alternatives available include taxis and wheelchair-accessible PHVs, which are both exempt, Dial-a-Ride, and some disabled people may be eligible for the Taxicard scheme helping to offset potential fare increases.

3.25. Some existing residents of the CCZ registering for the Residents' Discount after the proposed changes come into effect on 1 March 2027 may experience a change in health leading to a disability requiring use of a private vehicle for travel. As such, they may be disproportionately negatively impacted by the proposed change to the Residents' Discount, if not eligible for other discounts and exemptions. This impact is considered to be minor. The recommended modification for an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030 would help to further minimise the scale of the minor negative impact on disabled people, if approved, alongside the recommended modification to provide a 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone.

3.26. As with older people, some disabled people may face barriers to use of online systems, such as registering for Auto Pay. As described in respect of older people (above), alternative methods will be available.

Sex

3.27. The potential impact of the proposed charge level increase on care providers who are required to drive in the CCZ may have a disproportionately negative impact on women due to the demographics of the care industry in London. This impact is considered to be minor, as employers are likely to cover the charge for those required to pay the charge to access work, and the discounts and exemptions which carers may be able to use when transporting a person they care for, including the NHS patient reimbursement scheme (subject to eligibility), and 100 per cent Blue Badge discount. Additionally, the proposed new CVD will benefit those with EVs.

3.28. As a result of the proposed charge level increase, potential negative impacts were identified on crime and safety for women who switch to public transport or use private modes (including PHVs which may experience increased fares) to travel. However, these are considered to be negligible.

3.29. The potential negative impact of the proposed charge level increase on PHV drivers may have a disproportionate negative impact on men due to the demographics of the PHV industry, and women who are PHV drivers may experience a differential negative impact as they may be more likely to be working part-time. This impact is considered to be minor, as it is likely that only a small proportion of PHV drivers who are unable to pass on the charge or have it covered by the operator will operate primarily in the CCZ during charging hours. The majority of PHV drivers in London work for the largest operators who apply a surcharge for trips in the CCZ (irrespective of whether the trips are during charging hours) for drivers to cover the charge. Additionally, this impact will diminish over time as vehicles are upgraded to EVs to meet licensing and operator requirements and fall within scope of the proposed new CVD.

Pregnancy and maternity

3.30. The anticipated minor improvements in air quality and potential marginal reductions in noise may have positive health impacts for this group (though changes in noise are likely to be largely imperceptible).

3.31. While some pregnant and maternal women who prefer travel by private vehicle may be negatively impacted by the proposed increase in charge level, the impact is overall considered to minor and limited in scale, with the recommended modifications, if approved, to provide an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030, and 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone providing further mitigations.

Race

3.32. Black, Asian and minority ethnic people may experience a minor disproportionately positive impact due to reductions in traffic and consequent improvements in air quality, road safety and noise (though changes in noise are likely to be largely imperceptible).

3.33. The reductions in traffic may improve perceptions of safety leading to increased uptake of cycling and walking, which may help increase cycling uptake in the CCZ amongst Black and Asian and minority ethnic Londoners.

3.34. While PHV drivers with an EV will benefit from the proposed new CVD, the proposed charge level increase may have a disproportionate negative impact on PHV drivers who do not drive an EV or a wheelchair-accessible vehicle, where the charge is not passed on to the customer or covered by the operator. A high proportion of PHV drivers in London are from a Black, Asian and minority ethnic background. This impact is considered to be minor, as it is likely that only a small proportion of PHV drivers who are unable to pass on the charge or have it covered by the operator will operate primarily in the CCZ during charging hours. The majority of PHV drivers in London work for the largest operators who apply a surcharge for trips in the CCZ (irrespective of whether the trips are during charging hours) for drivers to cover the charge. Additionally, this impact will diminish over time as vehicles are upgraded to EVs to meet licensing and operator requirements and fall within scope of the proposed new CVD.

3.35. A high proportion of care workers are from Black, Asian and minority ethnic groups. The potential impact of the proposed charge level increase on care providers who are required to drive in the CCZ may therefore have a disproportionately negative impact on Black, Asian and minority ethnic groups. This impact is considered to be minor as employers are likely to cover the charge for those required to pay the charge to access work, and the discounts and exemptions which carers may be able to use when transporting a person they care for, including the NHS patient reimbursement scheme (subject to eligibility), and 100 per cent Blue Badge discount. Additionally, those with EVs will benefit from the proposed new CVD.

3.36. The proposed charge level increase and proposed changes to the Residents' Discount may have a minor disproportionate negative impact on people from certain Black, Asian and minority ethnic groups in the CCZ who are required to drive, as they may be more likely to be on lower incomes. However, the recommended modification for an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030 will help to further minimise the scale of the impact, if approved. Additionally, the recommend modification to provide a 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone would act as a further mitigation minimising the scale of this impact, if approved.

<u>Religion or belief</u>

3.37. The proposed charge level increase may have a minor negative impact on religious people who require travel by private vehicle to religious services during charging hours, if not eligible for existing discounts and exemptions or the proposed new CVD. If approved, the recommended modifications for an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030, and 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone would help to minimise the scale of this impact for residents of the CCZ.

3.38. The proposed charge level increase may have a disproportionate negative impact on PHV drivers who do not drive an EV or a wheelchair-accessible vehicle, where the charge is not passed on to the customer or covered by the operator. A high proportion of PHV drivers in London are Muslim. This impact is considered to be minor, as it is likely that only a small proportion of PHV drivers who are unable to pass on the charge or have it covered by the operator will operate primarily in the CCZ during charging hours. The majority of PHV drivers in London work for the largest operators who apply a surcharge for trips in the CCZ (irrespective of whether the trips are during charging hours) for drivers to cover the charge. Additionally, this impact will and diminish over time as vehicles are upgraded to EVs to meet licensing and operator requirements and fall within scope of the proposed new CVD.

<u>Gender reassignment</u>

3.39. As a result of the proposed charge level increase, potential negative impacts were identified on crime and safety for people undergoing or who have undergone gender reassignment who switch to public transport or use private modes (including PHVs which may experience increased fares) to travel. This includes when travelling to medical appointments when undergoing gender reassignment. However, these impacts are considered to negligible and limited in scale, and those with EVs will benefit from the proposed new CVD.

<u>Sexual orientation</u>

3.40. As a result of the proposed charge level increase, potential negative impacts were identified on crime and safety for LGBT people who switch to public transport or use private modes (including PHVs which may experience increased fares) to travel. However, these are considered to be negligible and limited in scale, and those with EVs will benefit from the proposed new CVD.

Asylum seekers and refugees

The identified potential impacts on charities and community groups due to the proposed charge level increase may disproportionately negatively impact asylum seekers and refugees. This impact is considered to be minor.

Homeless people

3.41. The identified potential impacts on charities and community groups due to the proposed charge level increase may disproportionately negatively impact homeless people. This impact is considered to be minor.

Carers

3.42. As a result of the proposed charge level increase, a minor disproportionate negative impact was identified on carers who are required to travel by private vehicle within the CCZ who are on low incomes, and not reimbursed by their employer for the cost of travel in the CCZ or are an informal carer. Existing mitigations including the NHS patient reimbursement scheme, and 100 per cent discount for Blue Badge holders help to mitigate this impact for carers when travelling with eligible clients. The recommended modification for an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030 would also help to mitigate this impact if approved, as well as the new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone. Those with EVs will also benefit from the proposed new CVD.

People on low incomes

3.43. As a result of the proposed charge level increase, a minor disproportionate negative impact was identified on people on low incomes who require travel by non-electric private vehicle, including for those travelling to or for work that are unable to switch modes or are unable to pass on or be reimbursed for the cost of the Congestion Charge, including carers and PHV drivers.

3.44. A minor disproportionate negative impact was identified on people on low incomes who are not registered for the Residents' Discount but move into (or are housed in) the CCZ after the proposed changes come into effect and require use of a private non-EV. If approved, the recommended modification to provide an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030 would help to mitigate the impact on people on low incomes, as would the new recommended modification to provide a 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone.

3.45. People living in more deprived areas may experience a minor disproportionate positive impact due to reductions in traffic and subsequent minor improvements in air quality, road safety and noise (though changes in noise are likely to be largely imperceptible).

4. Other considerations

Consultation and impact assessments (other than equality impacts)

4.1. According to the Mayoral Guidance, the Proposed Changes constitute a major variation to a scheme for the purposes of the Guidance. As is suggested in the Guidance, a 10-week consultation – later extended by one week to a total of eleven weeks as explained below – was undertaken by TfL on the Proposed Changes between 27 May and 11 August 2025.

4.2. The consultation was hosted on TfL's online consultation portal.[6] A range of consultation materials and a questionnaire, with versions in alternative formats, was available on this portal. TfL took steps to publicise the consultation using a range of media channels and its existing customer databases and met with some stakeholders on request. Detailed information about the consultation materials and how they were publicised is given in Chapter 3 of the Report to the Mayor (Appendix 1).

4.3. Respondents to the consultation were asked to complete and submit an online questionnaire to provide their feedback about the Proposed Changes, each specific proposal and the draft revision to the Mayoral Guidance. The online questionnaire included a number of open and closed questions, providing an opportunity for respondents to indicate their views about each of the proposals, and give additional comments and feedback. TfL offered a number of ways for respondents to respond:

- online – through the consultation portal
- e-mail – comments e-mailed directly to TfL
- post – by letter or return of hard copy of questionnaire.

4.4. TfL commissioned Aecom, an independent consultancy, to analyse the consultation responses. All closed questions were reviewed, and the results tabulated and reported. All open questions, where respondents provided comments, were read and analysed in detail.

4.5. Aecom developed a 'code frame' for the open questions. Each code frame is a list of the issues raised during the consultation, together with the frequency with which each issue was raised.

4.6. The remainder of this section is an overview of the issues that were raised in consultation responses. This is intended as a summary only and TfL's full consideration of the responses is included in the Report to the Mayor (Appendix 1) which the Mayor is asked to read in conjunction with this form. Chapter 4 of the Report to the Mayor contains a detailed quantitative analysis of the responses. Chapter 5 provides more detail on the responses, including a qualitative analysis of the comments made via the survey or other means. Chapter 5 also sets out TfL's detailed response to these issues.

4.7. Copies of all consultation responses have been made available to the Mayor.

<u>Updates during the consultation period</u>

4.8. During the consultation period some minor amendments to the consultation materials were made relating to the average number of EVs seen in the CCZ on weekdays and weekends. TfL wrote to everyone who had already responded to the consultation to explain the minor changes that had been made. TfL also published additional data on the consultation portal in the interests of transparency following two requests for further information made pursuant to the Environmental Information Regulations 2004. TfL informed anyone who had already submitted their response that this new information had been published and gave them the opportunity to change or supplement their response if they wished to do so. The consultation was extended by one week to allow everyone three weeks to consider the additional data when preparing or supplementing their response. Detailed information about these updates is provided in section 3.2 of the Report to Mayor (Appendix 1).

<u>Responses received</u>

4.9. A total of 4,561 responses were received, of which 99 were from stakeholders.

4.10. The responses included two organised responses: one from Zipcar, a total of 42 responses; and one from Routemaster buses, a total of 152 responses. We also received three consultation responses expressing a shared opinion on behalf of a group of stakeholders. Further information on these responses is given in section 4.2 of the Report to the Mayor.

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[6] https://haveyoursay.tfl.gov.uk/congestion-charge-changes

Responses to the Proposed Changes

4.11. This section provides a high-level overview of the comments received in respect of the Proposed Changes from the public and stakeholders who either completed the consultation questionnaire or submitted a separate response. Full consideration of the responses is set out in Chapter 5 of the Report to the Mayor (Appendix 1) which the Mayor is asked to consider when making his decision.

4.12. Those who responded via the consultation questionnaire were asked the following closed question in respect of each proposal: "How effective do you consider this proposed change to the Congestion Charge would be in achieving our aims to manage traffic and congestion in London?" (Questions 13 – 15). The responses received, calculated as percentages of the number who responded to the particular question, are set out below under each proposal's sub-heading.

4.13. They were also asked to provide their comments on the Proposed Changes and the draft revision to the Mayoral Guidance, including any impacts on people with protected characteristics, by way of an open question (Question 16). The most frequently raised issues, drawing on Aecom's analysis of the responses received via the questionnaire or otherwise, are identified below. A headline summary of the issues raised by stakeholders is also provided.

4.14. A second set of closed questions asked people how the Proposed Changes as a whole would impact the way that respondents travel in the CCZ (Questions 17 – 18). Just over half (53 per cent) responded that the Proposed Changes would not make any difference to the way they travel. Fifteen per cent said they would be unable to travel into or within the CCZ. One fifth (19 per cent) said they would travel more by public transport or active travel within the CCZ, while four per cent said they would travel less by public transport or active travel in the CCZ. Three per cent said they would travel more by EV in the CCZ, while six per cent said they would travel less by EV in the CCZ.[7]

<u>Proposal A: Increasing the Congestion Charge from £15 to £18</u>

4.15. Of the respondents who answered the closed question about the effectiveness of Proposal A (Question 13), 55 per cent considered Proposal A would have some effect in helping to manage traffic and congestion in central London. Of this 55 per cent, 33 per cent considered it would have a moderate or major effect, and 22 per cent considered it would have a minor effect.

4.16. Table 5-4 of the Report to the Mayor sets out the issues raised or comments made in relation to Proposal A and the number of times they were mentioned. The most frequently-raised issues were to:

- oppose/disagree with the proposed increase to the charge level
- suggest that charge should be higher (than £18/in general)
- suggest that charge should be lower/is already expensive.

4.17. In addition to being noted in Table 5-4, a summary of individual stakeholders' responses is provided below the table. The headline issues raised by stakeholders are:

- some business representatives and a trade union suggested that the charge level increase should be phased over a period of time (e.g. three years) to help businesses
- some political representatives commented that the charge increase is higher than inflation; other stakeholders stated that it was below inflation, and some suggested the increase take place in March rather than January 2026

[7] As respondents were not obliged to answer all questions in the questionnaire, the percentages are based on those that responded to the particular question. This denominator will therefore vary by question.

- some business representatives asked for a lower charge level for car clubs given their role in reducing car ownership

- most host boroughs expressed broad support for the Proposed Changes, including Proposal A, although additional considerations or refinements were put forward including impacts on small businesses and low income, disabled or vulnerable drivers

- a host borough stated that it acknowledged the need to increase the charge over time to ensure a deterrent effect but noted that 20 per cent is a significant increase for individuals and businesses that rely on cars (and in this context supported future inflationary increases as per the proposed changes to the Mayoral Guidance)

- a trade union said the proposal could have an adverse impact on care workers, charity volunteers and NHS staff on low and middle incomes who rely on private vehicles.

4.18. TfL's response to these issues is set out in the last column of Table 5-4 and in the stakeholder narrative below the table.

Proposal B: A new Cleaner Vehicle Discount for electric vehicles whereby the discount varies by vehicle type

4.19. Of the respondents who answered the question about the effectiveness of Proposal B (Question 14), 57 per cent considered the proposals would have some effect in helping to manage traffic and congestion in central London. Of this 57 per cent, 34 per cent considered it would have a moderate or major effect and 23 per cent considered it would have a minor effect.

4.20. Table 5-5 of the Report to the Mayor sets out the issues raised or comments made in relation to Proposal B and the number of times they were mentioned. The most frequently-raised issues were to:

- raise concerns that the changes will prevent people upgrading to an EV

- raise concerns for people who had already invested in an EV

- suggest no discount for EVs

- oppose/disagree with the new CVD (providing a discount less than 100 per cent)

- suggest extending a 100 per cent discount for all EVs.

4.21. In addition to being noted in Table 5-5, a summary of individual stakeholders' responses is provided below the table. The headline issues raised by stakeholders are set out below.

4.22. Some respondents, including business representatives, organisations and a borough, raised some of the following concerns:

- Deficiencies in the modelling and in the IIA prevented respondents from being able to consider the full impacts the proposed changes. There was a concern that TfL's analysis was focused narrowly on traffic impacts rather than congestion or wider environmental impacts and on central London only.

- Substitution between EVs and non-EVs and competition for road space was not considered leading to flawed forecasts. It was argued that the overall result of the proposed changes from the current CVD would be a major shift away from EVs.

- The IIA did not provide a comparison of the proposals to present day conditions relying instead on the 'Do Nothing' scenario.

- One businesses stakeholder requested that TfL conduct additional analysis of the proposals and run a refreshed consultation on the basis of that updated analysis, extending the 100 per cent CVD in the meantime.

- Proposal B did not align with the air quality and climate objectives of the Mayor, as set out in the MTS and London Environment Strategy.

- Measures to support EV transition such as a future central London Zero Emission Zone that were envisaged in 2018 (when it was decided that the CVD would end in 2025) had not been introduced and that this justified continuing with the 100 per cent discount.

- Traffic in central London had fallen since 2018 when the decision to end the CVD was taken, with traffic levels now lower than pre-pandemic levels.

- A few respondents requested that PHVs and commercial vehicles should receive a higher percentage or 100 per cent discount.

4.23. Several boroughs and political, business, community, health and environmental stakeholders stated that the 100 per cent discount for EVs (due to end in December 2025) should continue for small and medium size businesses and/or charities.

4.24. Some boroughs and business representatives and organisations stated that we should treat car club vehicles and rental vehicles differently from private cars in our proposals as they provide an alternative to private car ownership and use.

4.25. Some environmental stakeholders recommended an end date for the proposed new CVD for cars by 2034, suggesting there will be a good enough second-hand market to allow affordable EV cars. Another environmental stakeholder stated their support to the proposed new CVD but that it should end in 2035.

4.26. Some political stakeholders supported the automatic registration for the CVD through Auto Pay, but raised concerns about the requirement not being understood by drivers. Another stakeholder also stated that Auto Pay may not be accessible to everyone, so setting up an account, the Auto Pay process and registering for a discount should be simple and free for users. A business representative stated that the CVD registration should be automatic to reduce the costs for businesses and a business organisation said that the Auto Pay requirement is unfair for drivers who do not travel regularly into London (i.e. vehicles from Europe). One host borough stated that it opposed the Auto Pay requirement.

4.27. TfL's response to these issues is set out in the last column of Table 5-5 and in the stakeholder narrative below the table.

Proposal C: Changes to the vehicle eligibility criteria for the Residents' Discount for new applicants to support residents in switching to EVs

4.28. Of the respondents who answered the question about the effectiveness of Proposal C (Question 15), 52 per cent considered it would have some effect in achieving TfL's aims to manage traffic and congestion in central London. Of this 52 per cent, 29 per cent of respondents considered this proposal would have a moderate or major impact and 23 per cent considered it would have a minor impact, while 10 per cent said they did not know how effective the proposal would be.

4.29. Table 5-6 of the Report to the Mayor sets out the issues raised or comments made in relation to Proposal C and the number of times they were mentioned. The most frequently-raised issues were to:

- raise concerns about the lack of affordable EVs and suitable charging

- oppose the proposed changes to the Residents' Discount

- suggest that the discount level should be higher or should be an exemption
- make other comments or suggestions about discounts for residents or new applicants
- support/agree with the proposed residents' discount for new applicants.

4.30. In addition to being noted in Table 5-6, a summary of individual stakeholders' responses is provided in narrative form below the table. The headline issues raised by stakeholders are set out below:

- a host borough and a number of business representatives and transport and environmental representatives said that the Residents' Discount should apply to residents of the Congestion Charging Zone using car clubs
- a motor trade association said that businesses registered in the zone with zero emission vehicles should be eligible for the Residents' Discount
- an environmental organisation stated that the proposed grandparent rights for the Residents' Discount undermined the new CVD and that it should only be available for EVs after 2035
- a host borough proposed that after 2030, existing holders of a Residents' Discount should retain the discount until they replace their vehicle – then only residents who replace their vehicle with an EV would retain the discount
- another host borough supported the proposal but said we should consider attaching the Residents' Discount to the vehicle rather than the resident so when residents buy a new vehicle they are incentivised to purchase an EV
- a host borough and a transport watchdog asked about the impact on low income and disabled residents who do not qualify for a Blue Badge.

4.31. TfL's response to these issues is set out in the last column in Table 5-6 and in the stakeholder narrative below the table.

Changes to the Mayoral Guidance

4.32. A closed question was not asked in respect of the draft revision to the Mayoral Guidance. Significantly fewer comments were made in response to the draft revision compared to Proposals A, B and C. Table 5-7 of the Report to the Mayor sets out the issues raised or comments made in relation to the draft revision and the number of times they were mentioned.

4.33. There was both support for and opposition to the draft revision. Concern was expressed about the proposed changes to the minimum consultation periods. The most frequently made comment was support for the new routine variation procedure which would allow for charge levels to increase in line with Tube and TfL railway fares, RPI plus one per cent or a lower amount.

4.34. In addition to being noted in Table 5-7, a summary of individual stakeholders' responses is provided in narrative form below the table. The headline issues raised by stakeholders are set out below:

- several business organisations stated that they opposed the change which would enable inflationary changes to the Congestion Charge without consultation because businesses do not experience public transport fare increases in the same way as private individuals
- one business stated there should be a five-year review cycle
- a business representative group also stated that we should provide multi-year clarity and certainty on charge levels to help with business forward-planning

- a host borough supported the change to enable inflationary increases but did not support the proposal for shorter consultation periods or the proposal not to consult on other routine changes, saying that people needed time to consider and respond to these changes

- a transport watchdog stated that six weeks is the minimum time people should be given to respond to consultations and TfL should extend this when proposals are more significant

- a disabled people's group stated that shorter consultation periods could present a barrier for disabled people

- a political representative was concerned that these changes would undermine public trust in authorities and that this was already in decline.

4.35. TfL's response to these issues is set out in the last column in Table 5-7 and in the stakeholder narrative below the table.

Comments on impacts of the Proposed Changes

4.36. The consultation questionnaire invited respondents to comment on the impacts of the Proposed Changes, including whether the impact is due to a protected characteristic.

4.37. With regard to wider traffic and environmental impacts, the most frequently-made comments related to concern about people who are unable to use public transport or active travel owing to health issues and disabilities, including older people; concern that the proposals would have no impact on traffic and congestion; and comments and suggestions about public transport (including EVs).

4.38. For financial and economic impacts, the most frequently made comments related to the impacts on small businesses and sole traders, the cost-of-living crisis and those struggling financially.

4.39. For social impacts, the most frequently made comments related to negative impacts on social/leisure activities, and on negative impacts to older and disabled people, including faith groups (e.g. travelling to church) and disabled and older people who may be less able to use modes other than a car.

4.40. In addition, the headline impacts set out below were raised by some businesses and representative organisations (including boroughs):

- the Mayor's ongoing Public Sector Equality Duty requires that he consider the disproportionate impact that the 'Do Nothing' scenario will have on PHV drivers from Black, Asian and minority ethnic backgrounds and of Muslim faith regardless of the 2018 decision

- the proposal would impose heavy costs on professional drivers who had invested in EVs. Some may choose to retain or revert to diesel vehicles and PHV drivers may choose not to enter the CCZ anymore

- boroughs and business organisations said that there could be a negative impact on the viability of car clubs

- the proposals will have a negative impact on commercial vehicles' service levels, quality and reliability.

4.41. A trade union raised concerns that the proposals will disproportionately affect care workers, charity volunteers and NHS staff on low and middle incomes who rely on private vehicles. Black cabs which are exempt from the Congestion Charge are an inadequate alternative for disabled people as they are too expensive.

4.42. TfL has considered and responded to these issues raised in the last columns of Tables 5-8, 5-9 and 5-10 of the Report to the Mayor and in the stakeholder narrative below these tables.

TfL's proposed modifications and mitigations

4.43. It is recommended that Proposals A and B are implemented as consulted on and that Proposal C is implemented with modifications as described below, and the draft revision to the Mayoral Guidance is issued.

Modification A

4.44. TfL is recommending that the current vehicle eligibility criteria to qualify for the Residents' Discount should continue to apply to new applicants in receipt of certain benefits (including low-income) for an extended period.

4.45. The new vehicle eligibility criteria are proposed to apply from 1 March 2027, however, in response to feedback received as part of the consultation, it is proposed the rules for residents in receipt of certain benefits (including low-income) are adjusted. The modification would mean these residents need not have an EV in order to qualify for the Residents' Discount between 1 March 2027 and 3 March 2030 and will receive 'grandparent rights' going forward if they qualify for the Discount during this period (i.e. their vehicle's fuel type will not be relevant to determining eligibility for the Residents' Discount going forward). The qualifying benefits are[8]:

- Universal Credit
- Pension Credit
- Carer's Allowance
- Personal Independence Payment (PIP)
- Attendance Allowance
- Disability Living Allowance
- (New style) Employment and Support Allowance (ESA)

4.46. Grandparent rights may only be exercised if the resident continues to satisfy the discount's other eligibility criteria and makes timely renewals.

4.47. This modification would serve as a mitigation for residents on a low income (and in receipt of certain benefits). The draft IIA recognised that the Proposed Changes could have a potential minor negative impact on low-income residents, disabled people, and older residents applying due to the potential barriers to owning or accessing an EV (and associated infrastructure). However, it was considered at the time that factors such as providing the extended deadline to March 2027 to apply for grandparent rights; the lower levels of car ownership in the CCZ and by low-income groups; and the existing support such as the Blue Badge discount and exemption for vehicles in the disabled tax class, meant that the impact would be minor. The proposed modification helps to further reduce the scale of the minor negative impact for those eligible and registering prior to 4 March 2030.

Modification B

4.48. A specific new 100 per cent discount for back to base car club[9] EVs based in bays in the Residents' Discount zone (the CCZ plus a buffer) is recommended as a mitigation to the proposed changes to the Residents' Discount.

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[8] The benefits are aligned with the changes to benefits taking place which would see some subsumed by Universal Credit from March 2026.

[9] Back to base car club: collecting and returning the vehicle to the same marked bay and often requires a regular membership fee and advanced booking

4.49. It is intended that the discount would benefit existing and future residents including those on low incomes who may require a vehicle to travel in the CCZ and for whom it may be harder to access EVs, without which they would have to pay the full Congestion Charge for travel in the CCZ within charging hours. The car club must be the registered keeper of the EV and the EV must be driven by the member of the car club. For data protection and administrative reasons, the car club member would not have to be a resident of the CCZ. Car club vehicles which are licensed for use as PHVs are excluded given the congestion and traffic impacts which are likely to arise from their use.

4.50. It is considered that this modification will help to further mitigate the impacts of the proposed changes to the Residents' Discount as raised by stakeholders and identified in the IIA beyond the originally planned extended notice period to March 2027 (or 2030 for people eligible as a consequence of Modification A) for the changes to come into effect.

4.51. The discount to be introduced by the modification would come into effect on 2 January 2026.

Further analysis and consultation

4.52. It is not recommended that further modelling of the impacts of the proposals is undertaken as has been suggested by some stakeholders. TfL does not consider additional information was necessary in order to understand the consultation proposals and submit an informed consultation response. Nor does it consider that it was necessary to assess air quality impacts at a London-wide level given these are likely to be negligible. As a consequence, TfL does not consider that further consultation on the proposals is required.

4.53. It is also not recommended that the modifications are subject to a separate consultation and mayoral decision. Both modifications have been developed to address issues raised in consultation responses. Although the modifications introduce new benefits including a new discount, it is not considered necessary to consult specifically on them. The modifications are intended to mitigate the impacts of the proposed changes to the Residents' Discount as identified by consultation respondents, are limited in scope and are targeted at supporting a confined group of people.

Key risks and issues

4.54. GLA officers consider that TfL officers have adopted sound project management techniques in developing the Proposed Changes; and that risks have been appropriately mitigated. Officers have taken the following steps to mitigate risks:

- the 2025 Variation Order was made and the public and stakeholder consultation was conducted in accordance with relevant standards and the guidance issued by the Mayor (please see Report to the Mayor (Appendix 1) and section 3, above)

- the Proposed Changes were developed through regular monitoring of the Congestion Charging scheme as a long-term activity

- TfL prepared the IIA which considered the impacts of the Proposed Changes, including on targeted groups, and which is provided to the Mayor for the purposes of informing his decision on whether to implement the Proposed Changes (see Appendix C of to the Report to the Mayor, which is attached to this form at Appendix 1)

- the consultation responses have been analysed and considered, and the Report to the Mayor has been prepared to assist the Mayor in deciding whether to implement the Proposed Changes

- TfL officers sought legal advice throughout the process.

4.55. No officer involved in the drafting or clearing of this Mayoral Decision has any interests to declare.

Links to Mayoral strategies and priorities

Mayor's transport duty and Transport Strategy

4.56. The Mayor has a "[g]eneral transport 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" (section 141 of the Greater London Authority Act 1999). Transport facilities and services include "those required to meet the needs of persons living or working in, or visiting, Greater London". The Mayor must publish a "transport strategy", which includes the Mayor's policies and proposals for discharging the general transport duty (section 141 of the Greater London Authority Act 1999).

4.57. The MTS was published in March 2018 and contains the following proposal in relation to the Congestion Charge:

Proposal 20: The Mayor, through TfL, will keep existing and planned road user charging schemes, including the Congestion Charge, Low Emission Zone, Ultra Low Emission Zone and the Silvertown Tunnel schemes, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy.

4.58. The following proposal derives from Policy 5:

The Mayor, through TfL and the boroughs, and working with stakeholders, will prioritise space-efficient modes of transport to tackle congestion and improve the efficiency of streets for the movement of people and goods, with the aim of reducing overall traffic levels by 10-15 per cent by 2041.

4.59. The MTS has an overarching objective, stated in Policy 1:

The Mayor, through TfL and the boroughs, and working with stakeholders, will reduce Londoners' dependency on cars in favour of active, efficient and sustainable modes of travel, with the central aim for 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041.

4.60. The MTS is organised under three themes: Healthy Streets and Healthy People; a Good Public Transport Experience; and New Homes and Jobs. The Congestion Charge contributes to the achievement of objectives under these themes, in particular the following:

- Healthy Streets and Healthy People:
  - for all Londoners to do at least 20 minutes of active travel a day by 2041 (Policy 2)
  - 10 per cent reduction in morning peak freight transport in central London by 2026 (Proposal 15)
  - Vision Zero aim, for no individuals to be killed or seriously injured on London's roads by 2041 (Policy 3)
  - at least 3 million fewer daily car trips and 250,000 fewer cars owned in London by 2041 (Policy 5).
- A Good Public Transport Experience: approximately 5-15 per cent improvement in bus speeds London-wide by 2041, with particular improvements expected in inner London (Policy 15).

4.61. Also of relevance to these proposals is Proposal 19 of the MTS:

The Mayor, through TfL and the boroughs, will support the provision of car clubs for residents when paired with a reduction in the availability of private parking, to enable more Londoners to give up their cars while allowing for infrequent car travel in inner and outer London.

4.62. In 2022, following a public consultation, the Mayor published a revision to the MTS[10] which reflected the Mayor's ambitions to reduce air pollution, reflecting new WHO guidelines issued in 2021[11],and for London to be a net zero carbon city by 2030. A new proposal (Proposal 24.1) was inserted which provides that TfL should seek to use road user charging schemes to address the specific challenges of toxic air pollution, the climate emergency and traffic congestion:

Proposal 24.1: The Mayor, through TfL and the boroughs, will seek to address the triple challenges of toxic air pollution, the climate emergency and traffic congestion through road user charging schemes including by expanding the Ultra Low Emission Zone London-wide.

4.63. Although this revision was made in the context of the proposed expansion of ULEZ London-wide (which was subsequently implemented in August 2023), the Congestion Charge is one of the schemes which collectively contribute to these aims. As the name of the scheme indicates, the primary objective of the Congestion Charge is to manage the overall number of vehicles in central London so as to reduce traffic and congestion.

London Environment Strategy (LES)

4.64. In May 2018 the Mayor published a new LES, following a public consultation. The LES complements the MTS, and sets out the Mayor's aspiration to achieve a zero-carbon capital, including the need to implement a Healthy Streets approach and move to more sustainable transport including ultra-low and zero emission vehicles. The Strategy recognises the relationship between vehicles, congestion and air pollution; and the need to set out a number of objectives and policies, in line with the Mayor's duties. Relevant policies include:

- Policy 4.2.4: the Mayor will work with the government, the London boroughs and other partners to accelerate the achievement of legal limits in Greater London and improve air quality
- Policy 4.2.1: reduce emissions from London's road transport network by phasing out fossil fuelled vehicles, prioritising action on diesel, and enabling Londoners to switch to more sustainable forms of transport.

The London Health Inequalities Strategy

4.65. In September 2018, the Mayor published his Health Inequalities Strategy, setting out his vision for London to be a healthier, fairer city, with all Londoners having the best opportunities to live a long life in good health. The document sets out the Mayor's summary of commitments and outlines the areas the Mayor has committed to working on with partners. One of these has direct relevance to the proposed changes:

Through TfL, implement the Healthy Streets Approach to help make walking, cycling and public transport the most attractive daily transport options in London.

Zero Carbon London: A 1.5°C Compatible Action Plan

4.66. In 2022, Element Energy published a report, commissioned by the GLA, analysing pathways to achieving net zero carbon. The GLA published the Mayor's response 'London Net Zero 2030: An Updated Pathway', in which the Mayor sets out his preferred pathway to net zero – the Accelerated Green pathway. Amongst other things, achieving this will require:

- 27 per cent reduction in car vehicle km travelled by 2030

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[10] See https://www.london.gov.uk/programmes-strategies/transport/our-vision-transport/mayors-transport-strategy-2018

[11] See WHO global air quality guidelines: particulate matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide

- Fossil fuel car and van sales ended by 2030 and enforced in line with the government's existing commitments.

5. Financial comments

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

5.2. In 2026-27, the first full financial year in which the Proposed Changes would have effect, the expected operating surplus from the Congestion Charging scheme, if all the Proposals Changes are implemented, is forecast to be around £320m. This represents the income raised from charges and penalties (paid), less the costs associated with operating the scheme. In addition to the operating surplus, TfL is expected to incur around £20m of capital costs to implement the Proposed Changes.

5.3. These figures are provided for information only. They serve as context to the forecast operation of the Congestion Charging scheme rather than being a relevant consideration that the Mayor should take into account when deciding whether or not to implement the Proposed Changes. Net road user charging revenue must be applied for 'relevant transport purposes' – that is, to facilitate directly or indirectly the implementation of the MTS.

5.4. Information about the gross and net revenue of the Congestion Charging scheme is published in TfL's Annual Report and Accounts, which are available on TfL's website. TfL also publishes a four year programme on its website which sets out how the net proceeds are to be applied.

6. Legal comments

6.1. This section considers legal issues that are not addressed elsewhere in the form.

Procedural considerations – Proposed Changes

6.2. Section 295 of and Schedule 23 to the Greater London Authority Act 1999 (GLA Act) provide that TfL may establish and operate schemes for imposing charges in respect of the keeping and use of motor vehicles on roads in Greater London. The Congestion Charging scheme is an example of such a road user charging scheme and TfL is the charging authority in respect of it.

6.3. TfL and the Mayor's powers to make changes to a road user charging scheme are exercisable in the same manner and subject to the same limitations and conditions as apply when a scheme is first established (paragraph 38 of Schedule 23 to the GLA Act). The statutory procedure set out in Schedule 23 provides that a scheme (and changes to it) must be contained in an order. As noted above, the Scheme Order contains the Congestion Charging scheme. It has been amended numerous times and a consolidated version of it is published on TfL's website.

6.4. A variation order is the legal instrument through which TfL proposes changes to an existing road user charging scheme. TfL, as the charging authority, is responsible for making a variation order but it will only have effect if it is confirmed by the Mayor, with or without modifications. As noted above, TfL made the Greater London (Central Zone) Congestion Charging (Variation) Order 2025 (the 2025 Variation Order; Appendix 2), which contains the amendments to the Scheme Order that are needed in order to give effect to the Proposed Changes. It was published as part of the consultation materials.

6.5. Schedule 23 provides that the Mayor, acting on behalf of the GLA, may do the following:

- consult, or require TfL to consult, other persons
- require TfL to publish its proposals for the scheme and to consider objections to the proposals

- hold an inquiry, or cause an inquiry to be held, for the purposes of any order containing a charging scheme
- appoint the person or persons by whom any such inquiry is to be held
- make modifications to any such order, whether in consequence of any objections or otherwise, before such order takes effect
- require TfL to publish notice of the order and of its effect
- require TfL to place and maintain, or cause to be placed and maintained, such traffic signs in connection with that order as the Mayor may require
- issue guidance to TfL in relation to the discharge of its functions under Schedule 23 to which TfL must have regard when exercising its functions.

6.6. In compliance with paragraph 4 of Schedule 23 and the Mayoral Guidance, TfL undertook the consultation detailed in this form and the Report to the Mayor, including discharging the publicity obligations. Whether further consultation or a public inquiry should be held is a matter for the Mayor to decide. However, neither is recommended as they are unlikely to elicit any additional information which has not already been stated in consultation responses or identified in the IIA.

6.7. At the time of confirming a variation order, the Mayor is permitted to make modifications to it (paragraph 4 of Schedule 23). TfL is suggesting that the modifications described in section 4 above are made. The modifications are intended to mitigate the impacts of the proposed changes to the Residents' Discount. It is open to the Mayor to decide to introduce these modifications following consideration of consultation feedback. The modifications are limited in scale and are intended to benefit a small group of people. The modifications are set out in the Greater London (Central Zone) Congestion Charging (Variation) Order 2025 Instrument of Confirmation 2025 (Appendix 3) that the Mayor is asked to execute should he decide to confirm the 2025 Variation order with the modifications specified.

The Mayor's Transport Strategy (MTS)

6.8. The MTS acts as an important basis for road user charging schemes. Schedule 23 to the GLA Act provides that the establishment and subsequent variation of a scheme must appear desirable or expedient for the purpose of facilitating (directly or indirectly) the achievement of any policies and proposals of the MTS. The resulting scheme, including as varied, must also be in conformity with the MTS.

6.9. For the reasons set out in this form and in the Report to the Mayor, the Proposed Changes are considered to be desirable or expedient to the delivery of several policies and proposals of the MTS. Relevant policies and proposals have been identified above. The Proposed Changes will not affect the Congestion Charging scheme's conformity with the MTS given the MTS does not prescribe the level of charge, the eligibility criteria for discounts nor the availability of specific discounts. In line with Proposal 20, the Congestion Charging scheme will continue to be kept under review to ensure it continues to be effective in in furthering or delivering any MTS policies and proposals.

Considerations under the Human Rights Act 1998

6.10. Under section 6 of the Human Rights Act 1998, it is unlawful for a public authority to act in a way that is incompatible with the European Convention on Human Rights. As a public authority, the Mayor is required to consider possible interferences with people's Convention rights before deciding whether to confirm the 2025 Variation Order.

6.11. The Convention rights which might be engaged if the Proposed Changes are implemented are the right to privacy and family life (article 8); the right to the peaceful enjoyment and protection against deprivation of possessions (article 1 of the First Protocol) (A1P1); and the protection against discrimination on specified grounds (article 14). Article 14 may also be engaged if the measure is within the scope or ambit of article 8 or A1P1, even if there is no interference with those rights. These are qualified human rights – that is, they are subject to limitations that permit the rights to be restricted for certain specified purposes. In assessing whether any established interference with a convention right falls lawfully within a permitted category of restriction, the public body must demonstrate interference is provided for by law; pursues a specified legitimate objective; and is a proportionate means of pursuing that objective (that is, is necessary in a democratic society), having regard in particular to the public benefit to be derived from the action.

6.12. For the purposes of this decision form only, the Mayor is advised to proceed on the basis that the decision is within the ambit or scope of article 8 and A1P1, and that article 14 is engaged (because the proposed changes fall within the ambit or scope of a Convention right), but that the interference and any differential impact under article 14 can be shown by the Mayor to be justified. The Mayor's decision is in accordance with the law; pursues objectives including public safety, the protection of economic wellbeing, the protection of health, the protection of the rights and freedom of others (including the right to life) and the general interest; and is a necessary and proportionate response. In particular, there is no other less burdensome means of achieving the anticipated reduction in traffic in the CCZ (and other benefits identified above and in the IIA).

Mayoral Guidance

6.13. Paragraph 34 of Schedule 23 provides that the Mayor may issue guidance to TfL in relation to the discharge of its road user charging functions. As mentioned above, the Mayoral Guidance was issued on 16 February 2007, revised in 2022 and remains applicable today. TfL must have regard to this Guidance when exercising its road user charging functions.

6.14. The Mayor is permitted to vary the Mayoral Guidance at any time. There is no statutory obligation on the Mayor to consult when issuing updated Mayoral Guidance, however, in light of the changes provided for in the draft revision which include removal of the expectation of consultation in certain circumstances, it was considered prudent to seek the views of the public and stakeholders on the draft revision. In doing so on the Mayor's behalf, TfL has exercised delegated functions as given to TfL by the Mayor in Mayoral Decision MD3383.

7. Planned delivery approach and next steps

7.1. The Mayor is asked to consider the Report to Mayor which is appended to this report (Appendix 1) and includes the IIA. He is also asked to consider whether further consultation, further information or the holding of a public inquiry is necessary or appropriate prior to deciding whether or not to confirm the 2025 Variation Order. If the Mayor considers that further consultation and the holding of a public inquiry are not necessary or appropriate, it is recommended that the 2025 Variation Order is confirmed with the modifications described in section 5. It is also recommended that the Mayor issue the revision to the Mayoral Guidance to TfL.

7.2. If the 2025 Variation Order is confirmed, notice of the confirmation will be published in the London Gazette and other media in accordance with the Mayoral Guidance. The proposed changes to the charge level, the new CVD and the back to base car club EV discount (modification B) would be implemented on 2 January 2026 (with the second phase of the CVD from 4 March 2030). The changes to the Residents' Discount (including modification A) would be implemented from 1 March 2027.

7.3. TfL would also undertake a customer communications campaign to inform customers about the changes and what they need to do, including registering for Auto Pay (and Fleet Auto Pay) in order to have the benefit of the new CVD. This would include a press release, an updated dedicated web page on the TfL website, targeted emails to customers currently registered for payment of the Congestion

Charge or for the existing CVD, as well as residents registered for the Residents' Discount. Paid media would commence soon after the decision across London radio stations, and there would also be paid search services, so that customers are able to find the webpage more easily.

7.4. The revision to the Mayoral Guidance would come into effect immediately upon the Mayor's issue of it, however, the procedural changes it provides for will only be applied in respect of future proposed changes which may arise out of subsequent reviews of the Congestion Charging scheme. As MTS Proposal 20 provides, the Congestion Charge is to be kept under review to ensure in remains effective in furthering or delivering MTS policies and proposals. The revision allows for routine increases to the Congestion Charge to be made in line with annual increases to Tube and TfL railway passenger fares (or inflation plus one per cent or a lower sum). Tube and TfL railway passenger fares are usually implemented in March every year, with an announcement in the preceding December. It is anticipated that a similar timetable would apply for any routine Congestion Charge increases which are proposed. The revision to the Mayoral Guidance requires TfL to give sufficient notice to customers of any such changes.

Appendices and supporting papers:

Appendix 1 – Report to the Mayor on the consultation (the IIA is appended)
Appendix 2 – Greater London (Central Zone) Congestion Charging (Variation) Order 2025
Appendix 3 – Greater London (Central Zone) Congestion Charging (Variation) Order 2025 Instrument of Confirmation 2025
Appendix 4 – Revision to the Mayoral Guidance

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note**: This form (Part 1) will either be published within one working day after it has been approved <u>or</u> on the defer date.

Part 1 – Deferral

Is the publication of Part 1 of this approval to be deferred? NO

Until what date: (a date is required if deferring)

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – NO

ORIGINATING OFFICER DECLARATION:	Drafting officer to confirm the following (✓)
Drafting officer: <u>Philippa Borrowman</u> has drafted this report in accordance with GLA procedures and confirms the following:	✓
Sponsoring Director: <u>Philip Graham</u> has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.	✓
Mayoral Adviser: <u>Seb Dance</u> has been consulted about the proposal and agrees the recommendations.	✓
Advice: The Finance and Legal teams have commented on this proposal.	✓
Mayoral Decision Board This decision was agreed by the Mayoral Decision Board on 27 October 2025.	

CHIEF FINANCIAL OFFICER:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature	**Date**
Fay Hammond	10 November 2025

CHIEF OF STAFF:

I am satisfied that this is an appropriate request to be submitted to the Mayor

Signature	**Date**
D. Bellamy	10 November 2025