

Proposed Changes to the Congestion Charging scheme

Report to the Mayor on the consultation

October 2025

Contents:

1	Introduction	5
1.1	Purpose of report.....	5
1.2	Purpose of consultation	6
1.3	Structure of report.....	7
1.4	Congestion in London.....	7
1.5	The process for making changes to the Congestion Charging scheme and issuing mayoral guidance	9
2	Consultation proposals.....	11
2.1	Introduction.....	11
2.2	History of the Congestion Charging scheme.....	11
2.3	Summary of the consultation proposals	12
2.4	Integrated Impact Assessment.....	17
2.5	Recommended modifications.....	26
3	Consultation process	29
3.1	Introduction.....	29
3.2	Publicising the consultation.....	29
	Press release and media reaction	29
	Digital advertising.....	30
	Email campaign	30
	Press advertising	31
	Social media	32
	Poster and leaflet campaign.....	32
	Other channels used to publicise consultation	32
	Stakeholder engagement.....	33
	Consultation materials and channels for responding	34
	Analysing the outcomes.....	35
	An amendment to consultation materials, additional data and extension to the consultation end date.....	35
4	Consultation responses.....	37
4.1	Introduction.....	37
4.2	Methodology	37
	Receiving responses.....	37
	Campaigns.....	37
	Thematic coding.....	39
	Analysis and reporting.....	39

4.3	About the respondents.....	40
	Type of respondents	40
	Respondents' profiles.....	41
	Respondents' locations	42
4.4	Travel perceptions	43
	Importance of reducing traffic and congestion in Central London	43
	Importance of encouraging the use of zero emission vehicles in Central London.....	43
4.5	Travel behaviours	44
	Driving behaviours in central London	44
	Congestion Charge discounts, exemptions and reimbursements	45
	Frequency of driving in the CCZ.....	46
	Auto Pay accounts	47
4.6	Impact of proposals	47
	Effectiveness of proposals in achieving TfL's aims to manage traffic and congestion in central London	47
	Impact of proposals on travel in the CCZ	48
	Proposals which would likely reduce or prevent travel into or in the CCZ	49
	Impact of proposals on future vehicle purchase	50
4.7	Quality of the consultation	51
	How respondents heard about the consultation	51
	Experience of participating in the consultation	51
5	Responses to issues raised	53
5.1	Introduction.....	53
	Comments on the scheme proposals (Question 16)	55
5.2	General comments	55
	General comments: Support	55
	General comments: Oppose	56
	General comments: Other	58
5.3	Comments on specific proposals	60
	Charge level increase	60
	Other stakeholder comments – Charge level increase	67
	New Cleaner Vehicle Discount (CVD)	69
	Other stakeholder comments – CVD.....	83
	Changes to the Residents' Discount	102
	Other stakeholder comments – Residents' Discount	113
	Changes to the Mayor's Guidance	116
	Other stakeholder comments – Mayoral Guidance.....	120

5.4	Comments on specific impacts	122
	Wider impacts (including environment impacts)	122
	Financial and economic impacts	128
	Social impacts.....	137
	Other stakeholder comments	148
5.5	Comments on alternatives and mitigations	152
	Other stakeholder comments	160
5.6	Other comments relating to the Congestion Charging scheme	164
	Discounts and Exemptions.....	164
	Charging period	170
	Charge zone boundary.....	172
	Road User Charging	174
	Other stakeholder comments	178
	Comments on the consultation (Question 22).....	179
5.7	Comments on the consultation process	179
	Questions.....	180
	Accessibility	184
	Other comments on the consultation.....	187
	Other stakeholder comments	187
5.8	Issues which were not related directly or indirectly to the proposals or the scheme	188
6	Conclusions and recommendations	190
6.1	Conclusion.....	190
6.2	Recommendations	192
7	Appendices	193
	A – Supplementary Information	193
	B – Marketing materials and questionnaire.....	193
	C – Integrated Impact Assessment (IIA)	193
	D – Code frames used by AECOM in analysing the responses	193
	E – Consultation analysis report (by AECOM)	193
	F – List of Stakeholders contacted.....	193
	G – Summaries of stakeholder responses	193
	H – Stakeholder responses to closed questions	193

1 Introduction

1.1 Purpose of report

- 1.1.1 Transport for London (TfL) has developed proposals to change the Congestion Charging scheme to ensure it remains effective in tackling congestion in central London and delivering policies and proposals of the Mayor's Transport Strategy (MTS). The MTS provides that 80 per cent of trips in London are to be made by sustainable modes including walking, cycling and public transport and for there to be at least three million fewer daily car trips and 250,000 fewer cars owned in London, both to be achieved by 2041. The outcomes for central London over the same period are even more ambitious with the targets being 95 per cent mode share for walking, cycling and public transport for trips within central London (up from 90 per cent in 2015) and 99 per cent mode share for walking, cycling and public transport for trips between central London and inner/outer London (compared with 95 per cent and 90 per cent respectively in 2015). It sets out that the future of central London must involve a steady reduction in car use.
- 1.1.2 Every year, congestion costs the capital billions of pounds. Given the tightly constrained road network in central London, efficient movement is fundamental to the continued success of this area and, given its strategic importance, the success of London in general. Reliable deliveries and servicing, high-quality public services and easy access to workplaces and cultural and leisure attractions are all dependent on an efficient transport network. Lower traffic volumes have secondary benefits for other MTS outcomes in central London including improving air quality, reducing carbon emissions, reducing road danger and promoting efficient movement of bus journeys.
- 1.1.3 The proposed changes are:
- Proposal A: Increasing the Congestion Charge from £15 to £18;
 - Proposal B: A new Cleaner Vehicle Discount (CVD);
 - Proposal C: Changes to the Residents' Discount for new applicants.
- 1.1.4 Additionally, on behalf of the Mayor, we prepared a revision to guidance which the Mayor issues regarding the exercise of our road user charging functions ("the Mayoral Guidance"). The proposed amendments would better reflect the approach we and other charging authorities follow when undertaking consultations in comparable circumstances and when setting charges for our services, notably public passenger transport fares.

- 1.1.5 The public and stakeholders were invited to give their views on the proposed changes to the Congestion Charging scheme 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
- 1.1.6 This report describes how the consultation was carried out, summarises and provides analysis of the consultation responses and our responses to the issues raised and makes recommendations to the Mayor as to how we should proceed. It should be read in conjunction with the consultation materials (described in Chapter 3), which contain more details about the proposals, as well as information about their likely impacts and other relevant matters. The Supplementary Information that was published as part of the consultation materials is attached at Appendix A to this report. Particular regard should be given to the updated Integrated Impact Assessment (IIA) at Appendix C which describes the impacts of the proposed changes and our assessment of them and which has been finalised following feedback provided as part of the consultation process.
- 1.1.7 The Mayor is asked to take this report into account together with all the other information before him when deciding whether to confirm the proposals, with or without modification, and to revise the Mayoral Guidance.
- 1.1.8 Individual consultation responses have also been made available to the Mayor for his consideration.²

1.2 Purpose of consultation

- 1.2.1 The purpose of the consultation was to obtain the views of the public and stakeholders on the proposed changes to the Congestion Charging scheme and the draft revision to the Mayoral Guidance, and our assessment of their impacts. It gave the public and stakeholders the opportunity to comment and provide feedback.
- 1.2.2 The proposed scheme changes are treated as major variations for the purpose of the existing Mayoral Guidance and the consultation has been undertaken in accordance with the expectations of that Guidance.

¹ Please note, the consultation was originally planned to run for a ten-week period but was extended by one week. We describe this in greater detail in Chapter 3.

² Responses from members of the public have had personal data removed. Unless otherwise instructed, responses from stakeholders have been passed on in full.

1.3 Structure of report

1.3.1 Our analysis of the consultation responses and potential further mitigation recommendations are presented for the Mayor's information and to assist him to make a decision on whether to confirm the proposed changes, with or without modifications. The structure of this report is as follows:

- **Chapter 1: Introduction** – The remainder of this chapter provides the background to the consultation, including the legislative framework which applies when proposals are made to vary the Congestion Charging scheme.
- **Chapter 2: Consultation proposals** – A summary of the proposals and the impacts.
- **Chapter 3: Consultation process** – A summary of the consultation process.
- **Chapter 4: Consultation responses** – The outcomes of the consultation, including the number of responses received and who they were from.
- **Chapter 5: Responses to issues raised** – Our responses to the issues raised in relation to the proposals, by theme.
- **Chapter 6: Conclusions and recommendations** – Our overall conclusions and recommendations to the Mayor.

1.3.2 This report also has appendices relating to the marketing of the consultation, online access to it through the consultation website, and the consultation questionnaire (Appendix B), the analysis of responses to the consultation (Appendix D and E), as well as stakeholder responses (Appendix F, G and H).

1.3.3 Should the Mayor decide to proceed with the changes, London-wide marketing campaigns will be launched to ensure those affected are aware of upcoming changes and action they need to take.

1.4 Congestion in London

1.4.1 Published in 2018 and revised in 2022, the MTS sets out the Mayor's vision to create a fairer, greener, healthier, and more prosperous London. A shift away from car travel in favour of walking, cycling and public transport is critical to realising this vision and that is why the central aim of the strategy is for 80 per cent of all trips in London to be made on foot, by cycle or using public transport, as well as having at least three million fewer daily car trips and 250,000 fewer cars owned in London, both to be achieved by 2041.

1.4.2 The MTS outcomes for central London are even more ambitious, targeting a 95 per cent mode share for walking, cycling and public transport for trips within central London by 2041 (up from 90 per cent in 2015) and a 99 per cent mode share for walking, cycling and public transport for trips between central

London and inner/outer London by 2041 (compared with 95 per cent and 90 per cent respectively in 2015).

- 1.4.3 Central London is one of the world's best-connected places, giving people options to travel other than by driving. The MTS sets out that congestion must reduce in central London. Congestion reduction will not only help deliver the vision and central aim of the MTS but also help address poor air quality and the climate emergency, deliver the Mayor's ambition for Vision Zero and support vibrant, attractive and inclusive public spaces.
- 1.4.4 Given the tightly constrained road network in central London, efficient movement is fundamental to the continued success of this area and, given its strategic importance, the success of London in general. Reliable deliveries and servicing, high-quality public services and easy access to workplaces and cultural and leisure attractions are all dependent on an efficient transport network. The MTS has an objective to reduce the number of lorries and vans entering central London during the weekday morning peak by 10 per cent from 2016 levels, by 2026. This reflects pressures on the road network at this time of the day and will help to reduce road danger. This is especially relevant in the CCZ, with central London having the highest density of people killed or seriously injured across London.³
- 1.4.5 Every year, congestion costs the capital billions of pounds – in 2024 alone it cost London £3.85 billion⁴, averaging £942 per driver. This heavily impacts businesses, bus customers and other essential services. In addition, it makes public spaces unpleasant for walking and cycling and worsens air pollution.
- 1.4.6 The MTS recognises that following the introduction of the Congestion Charging scheme, the challenges facing central London continue to change. Proposal 20 commits the Mayor and TfL to keeping the Congestion Charge continuously under review to ensure that it remains effective in furthering or delivering the policies and proposals of the MTS.
- 1.4.7 In 2022, following a public consultation, the Mayor published a revision to the MTS, including a new proposal (24.1) which provides that 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. While the primary objective of the Congestion Charge is to reduce traffic and congestion in central London, lower traffic volumes

³ 1.51 KSIs per kilometre of road, twice the times compared to inner London, Jan 2022 to Dec 2023 (excludes inner Ring Road).

⁴ Source: [INRIX 2024 Global Traffic Scorecard: London most congested city in Europe; congestion costing the UK £7.7 billion. - INRIX](#). Please note, this figure does not take into account the cost of congestion on bus passengers and bus operating costs.

contribute to improving conditions for active, efficient and sustainable modes of travel, as well as achieving reductions in vehicle emissions in central London. The Congestion Charge is one of the schemes which collectively contribute to these aims.

1.5 The process for making changes to the Congestion Charging scheme and issuing mayoral guidance

- 1.5.1 TfL is the charging authority for the Congestion Charging Scheme. The rules of the scheme are contained in the Greater London (Central Zone) Congestion Charging Order 2004 ('the Scheme Order'). The Scheme Order defines the charging zone, when liability to pay the charge arises, the level of charge, the discounts and exemptions that apply and their criteria.
- 1.5.2 The process for modifying a road user charging scheme is set out in Schedule 23 to the Greater London Authority Act 1999. We are also required to have regard to the Mayoral Guidance on road user charging which the Mayor has issued pursuant to Schedule 23. Together they require that any proposed changes to a scheme must be contained in an order made by the charging authority (called a variation order) which, if confirmed by the Mayor, will amend the relevant scheme order and, therefore, the rules of the scheme. A consultation is usually undertaken in respect of the proposed changes which are included in the variation order. The procedure associated with making the variation order, the publicity requirements and the consultation are described in the Mayoral Guidance.
- 1.5.3 On 20 May 2025, we made the Greater London (Central Zone) Congestion Charging (Variation) Order 2025 ('the 2025 Variation Order') which sets out the amendments to the Scheme Order which are required in order for the proposed changes which were the subject of the consultation to be implemented. The 2025 Variation Order inserts new definitions which are relevant to the proposed changes to the Residents' Discount and to the new proposed CVD, amends the charge levels, introduces new vehicle eligibility criteria for new applicants for the Residents' Discount and creates the new proposed CVD. The 2025 Variation Order was published as part of the consultation materials together with a consolidated version of the Scheme Order which shows the proposed amendments to the rules in context.
- 1.5.4 Schedule 23 provides that a variation order must be confirmed by the Mayor in order for it to have effect. The Mayor's formal confirmation is done by the execution of an instrument of confirmation (this includes a schedule of variations if there are modifications). If the Mayor decides not to confirm a variation order then the variation order is of no consequence and the amendments to the Scheme Order that it provides for are not made. If the

Mayor confirms the variation order then the Scheme Order is taken to have been formally amended in accordance with the terms of the variation order.

- 1.5.5 The Mayor may issue guidance on the exercise of our road user charging functions pursuant to paragraph 34 of Schedule 23 to the Greater London Authority Act 1999. In May 2025, the Mayor asked us to review the Mayoral Guidance that had previously been issued and consider whether any amendments could be made to it which would better reflect our approach when consulting in comparable circumstances and when setting charges for our other services, in particular passenger transport fares.⁵ The Mayor also asked us to consult on any proposed amendments to the Guidance on their behalf, and delegated the necessary powers so that we could do so. As mentioned above, we are required to have regard to the Mayoral Guidance when we exercise our road user charging functions.
- 1.5.6 We prepared a draft revision to the Mayoral Guidance and consulted on it alongside the proposed changes to the Congestion Charging scheme.
- 1.5.7 The decision that the Mayor is now asked to make following the consultation is to confirm the 2025 Variation Order with some modifications as set out in the Greater London (Central Zone) Congestion Charging (Variation) Order 2025 Instrument of Confirmation and to issue the revision to the Mayoral Guidance as consulted on.

⁵ See MD3383 Guidance on TfL's exercise of road user charging functions

2 Consultation proposals

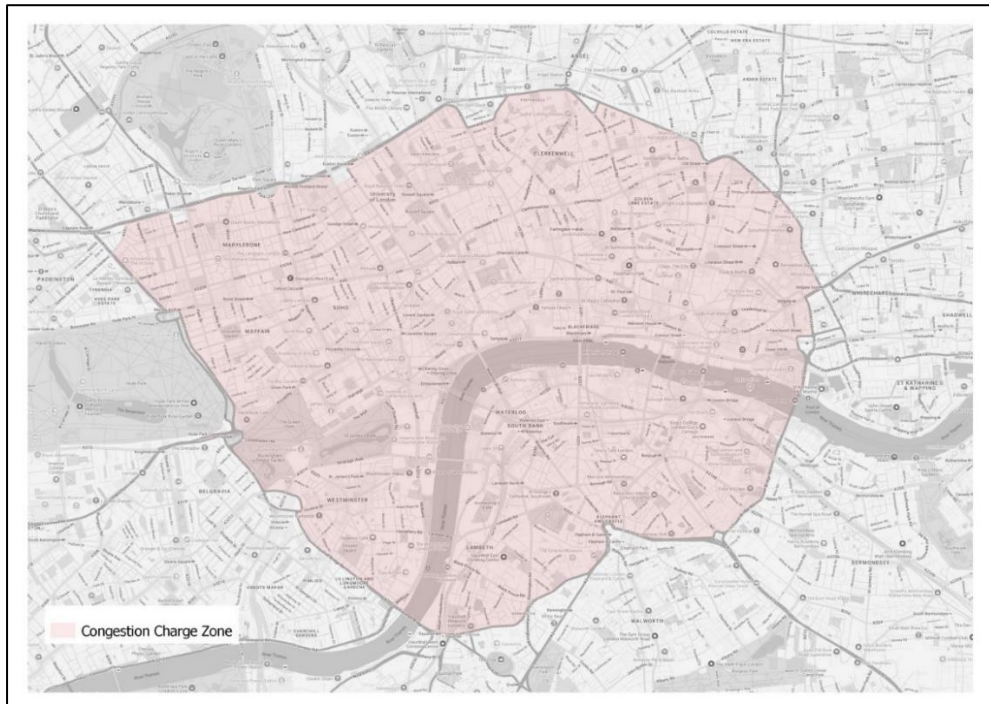
2.1 Introduction

- 2.1.1 This section provides an overview of the consultation proposals, how they were developed and how they are intended to operate. More detail is provided in the Supplementary Information document that was published as part of the consultation materials and is attached to this report in Appendix A. The section concludes with our recommendations to the Mayor on the implementation of the proposals, including our recommended modifications.

2.2 History of the Congestion Charging scheme

- 2.2.1 The Congestion Charging scheme was introduced in central London on 17 February 2003. The primary objective of the scheme is to manage traffic and congestion in central London by reducing the number of vehicles that enter the Congestion Charge Zone (CCZ) by imposing a charge during the busiest times of day.
- 2.2.2 Following its introduction, the scheme was very effective in reducing traffic and congestion in central London. There was a 30 per cent reduction in congestion in the CCZ, and a 15 per cent reduction in circulating traffic. It remains an integral part of managing demand for road space in central London and delivering certain aims of the MTS. In line with Proposal 20 of the MTS, we keep the scheme under review to ensure it remains effective in managing traffic and congestion, proposing changes when necessary.
- 2.2.3 The current boundary of the CCZ is shown in Figure 2-1.

Figure 2-1: The Congestion Charging Zone



- 2.2.4 The scheme requires that a daily charge is paid for each day that a vehicle is driven in the CCZ during charging hours. The Congestion Charging scheme has a number of discounts and exemptions, and a small number of reimbursements. Generally, customers have to register for a discount and provide proof of eligibility. Exemptions are typically automatically applied.
- 2.2.5 The Congestion Charging scheme has now been in operation for more than 20 years and has been changed many times in that period. These changes have covered a variety of aspects, ranging from the level of the charge to payment methods, operating hours and discount eligibility criteria.
- 2.2.6 In accordance with Proposal 20 in the MTS and the requirement to ensure the scheme remains effective, we continually monitor the number of vehicles being driven in the CCZ. This includes characteristics such as the vehicle type, times of day when people drive in the CCZ, the mix of fuel types, and the number of uncharged vehicles.

2.3 Summary of the consultation proposals

- 2.3.1 This section summarises the package of proposals for changes to the Congestion Charging scheme and the draft revision to the Mayoral Guidance we consulted on.

Proposal A: Changes to the charge level

2.3.2 The Congestion Charge has been set at £15 since 2020. It is now five years since the last charge level increase, and it is timely to review whether a further increase is necessary in order to maintain the deterrent effect of the charge in the context of wider inflation. We propose that the charge is increased to £18 from 2 January 2026, which would be a lower increase than inflation⁶ (since 2020). For those paying the charge in the three days after travel, the charge would increase from £17.50 to £21.

2.3.3 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 has been assessed and is forecast to have a positive impact on (that is, to reduce) traffic in the CCZ.

Table 2-1: Summary of Proposal A: changes to the charge level

Impact	2025 (Current situation)	From 2 Jan 2026	Future charge levels
Daily charge	£15	£18	Future charge levels to be set in accordance with the Greater London Authority Act 1999 and the Mayor's Guidance
Pay within three days (see details in following section)	£17.50	£21	

Proposal B: A new Cleaner Vehicle Discount (CVD)

2.3.4 The current 100 per cent CVD applies to all EVs and is due to end on 25 December 2025, as per Mayoral Decision 2397.⁷ The growing number of EVs in the zone means that maintaining the current CVD would undermine the deterrent effect of the scheme, encouraging more vehicle entries and contributing to worsening traffic and congestion. However, in order to continue to support further adoption of EVs we are proposing the introduction of a new CVD. This would provide long-term support for the cleanest vehicles, which

⁶ 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.

⁷ <https://www.london.gov.uk/decisions/md2397-amendments-congestion-charge-and-ultra-low-emission-zone>

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.

- 2.3.5 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.

From 2 January 2026:

- 50 per cent discount for electric vans, Heavy Goods Vehicles (HGVs), light quadricycles and heavy quadricycles registered for Auto Pay. With the charge level increase (Proposal A), this would mean a £9 daily charge.
- 25 per cent discount for electric cars registered for Auto Pay. With the charge level increase (Proposal A), this would mean a £13.50 daily charge.

From 4 March 2030:

- 25 per cent discount for electric vans, HGVs, light quadricycles and heavy quadricycles registered for Auto Pay. Daily charge level to be confirmed.
- 12.5 per cent discount for electric cars registered for Auto Pay. Daily charge level to be confirmed.

- 2.3.6 We also propose the discount is applied automatically to vehicles based on Driver and Vehicle Licensing Agency (DVLA) data. This will be a benefit for eligible customers as it will no longer be necessary to register for the CVD (or pay an annual registration fee).

- 2.3.7 We are also proposing that payment of the discounted charge is made by Auto Pay only. This means a vehicle must be registered for a free Auto Pay account in order to benefit from the CVD.⁸

- 2.3.8 More than 80 per cent of all Congestion Charge payments are now made by Auto Pay. It has benefits for the customer including no risk of incurring a Penalty Charge Notice (PCN) for non-payment of the Congestion Charge or other road user charging schemes in London. Customers can also access off-

⁸ A customer will still be required to register for the new CVD and provide proof that their vehicle is an EV if their vehicle is not registered with the DVLA or the DVLA record relating to their vehicle is incomplete, inaccurate or does not otherwise show that the vehicle is an EV or what its vehicle class is.

peak charges for the Silvertown and Blackwall tunnels user charges. There is no fee to set up an Auto Pay account and the discounted levels would be automatically applied if the vehicle associated with the Auto Pay account qualifies for the new CVD (subject to the DVLA vehicle record being correct). For TfL, Auto Pay reduces administrative costs and is a more effective payment system. It also means there is no need for customers to separately register for the CVD, as has been the case to date.

Proposal C: Changes to the Residents' Discount for new applicants

- 2.3.9 Currently, residents of the CCZ receive a 90 per cent discount because of their reduced ability to avoid the charge if they drive during charging hours. A relatively small charge applies because these vehicles contribute to traffic and congestion and to provide an incentive for residents to use more sustainable modes.
- 2.3.10 In the context of the proposed new CVD it is timely to consider potential changes to the Residents' Discount. As well as aligning with MTS policies on reducing private car use in favour of active, efficient and sustainable modes, our proposal reflects the London Plan approach to promoting car-free residential development in central London.
- 2.3.11 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, we are proposing that eligibility for the 90 per cent Residents' Discount will be limited to only EVs, starting on 1 March 2027. It is considered appropriate to incentivise those residents who choose to own and operate a vehicle in the CCZ to do so in the cleanest vehicles.
- 2.3.12 This would apply to new applicants only. To mitigate the impact on existing residents who may be reliant on their vehicle, no changes are proposed to those living in the zone who are registered as of 1 March 2027 when the proposed change is due to come into effect. These grandparent rights would remain for future years, provided the discount's other eligibility criteria continue to be met and timely renewals are made.

Table 2-2: Summary of Proposal C: Changes to the Residents' Discount⁹

	From 1 March 2027
All residents registered for the Residents' Discount on 1 March 2027 (regardless of vehicle type)	90 per cent discount 'Grandparent rights' apply
Residents with EVs registered for the Residents' Discount from 1 March 2027	90 per cent discount
Residents with a non-EV, not registered for the Residents' Discount on 1 March 2027	No discount

Mayoral Guidance on TfL's exercise of road user charging functions

2.3.13 The Mayor may issue guidance as to the exercise of our road user charging functions. We must have regard to any guidance that is issued.

2.3.14 On behalf of the Mayor, we consulted on some proposed changes to the current guidance which would better reflect the approach we follow when undertaking consultations in comparable circumstances and when setting charges for our services, notably public passenger transport fares.

2.3.15 The proposed amendments provide for the minimum consultation periods specified in the Guidance to be reduced (typically from 10 weeks to six weeks). This is in line with the length of time we usually undertake consultations in comparable circumstances. It is also similar to the length of time that other local authorities consult for in respect of their road user charging schemes, for example, clean air zones. The now widespread use of digital communication and the consequential change in customers' expectations and experience around how we undertake consultations mean that we typically consult for a shorter period of time than we did in 2007 when the consultation periods set out in the Guidance were suggested. The length of a specific consultation period will, in practice, be determined by numerous factors, for example, the complexity of the proposals being consulted on and the volume of material made available.

2.3.16 The draft revisions to the Guidance would also introduce 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.

⁹ Discount is on the daily charge only. There is no option to pay discounted charges after the day of travel.

- 2.3.17 The inflation indicator we propose to use is the Retail Prices Index annual rate for July which is the rate that is typically used to calculate railway fares.¹⁰ 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. We would be required to give customers reasonable advance notice of the user charge levels and when they would apply from.
- 2.3.18 This proposed change would allow for charge levels to be better aligned with Tube and TfL railway passenger fares thus ensuring that the cost of driving in central London remains proportionate to the cost of travelling by rail. It would also support the achievement of the scheme's objectives and in turn, the sustainable transport mode share aim of the MTS.
- 2.3.19 The proposed revision to the Guidance also provides for changes which are procedural or administrative in nature to be made without the need for consultation.
- 2.3.20 An Equality Impact Assessment (EqIA) will be undertaken each time we develop changes to user charges in the future and will inform the decisions of TfL and the Mayor. For this reason, the changes to the Guidance are not considered in the IIA.

2.4 Integrated Impact Assessment

- 2.4.1 A change to the Congestion Charging scheme will have multiple potential impacts, both positive and negative. It is important that we, in developing the proposals, and the Mayor, as decision maker, understand and consider the potential impacts. We undertook an Integrated Impact Assessment (IIA), including an Equality Impact Assessment (EqIA), of the likely impacts of the proposals for changes to the Congestion Charging scheme. The IIA has been reviewed by an external reviewer.
- 2.4.2 Under section 149 of the Equality Act 2010 (the Equality Act), as public authorities, the Mayor and TfL must have due regard when exercising public functions 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. This is known as

¹⁰ 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 Public Sector Equality Duty. Protected characteristics under the Equality Act are age, disability, gender re-assignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status. The duty in respect of the protected characteristic relating to marriage and civil partnership is to eliminate unlawful discrimination and other prohibited conduct under the Act only. In any case, marriage and civil partnership has been scoped out of the IIA as it is not anticipated that proposals will be of relevance.

- 2.4.3 As a functional body of the Greater London Authority (GLA) we have also considered the wider impacts of the proposals on other groups who are disadvantaged in London, and as such have included consideration of the potential impact on:
- People on low incomes;
 - Asylum seekers and refugees;
 - Homeless people; and
 - Carers (paid, voluntary, informal and personal assistants (PAs)).
- 2.4.4 These specific attributes are not protected under the Equality Act but may be common to people with protected characteristics. In the IIA, the 'People' category includes an assessment of groups of persons that share protected characteristics ('protected characteristic groups') and groups who may be disadvantaged.
- 2.4.5 The objective of the IIA is to understand the impacts of proposals on the following assessment areas:
- London's economy
 - London's environment
 - People (Health and Equality).
- 2.4.6 Each assessment in the IIA assesses the likely impacts of the proposals against the IIA objectives. It includes a summary of potential positive and negative impacts and identifies possible measures to enhance the positive impacts of proposals and mitigate against the negative impacts.
- 2.4.7 The IIA assesses the impacts against a 'Do Nothing' scenario. This scenario refers to the Congestion Charging scheme in the form it would exist from the first charging day of 2026 without further intervention – where the charge level remains at £15 and the CVD ends. This is the default position, since 2018 when the CVD was established. The proposals would change this, offering a new CVD and support for EV drivers for longer.
- 2.4.8 The IIA identified the expected impact of the proposals on a range of themes and groups. This included a range of minor negative impacts, alongside minor

positive or beneficial impacts. Each assessment identifies impacts against the relevant IIA objectives. In addition, impacts were determined against two assessment parameters: the scale of the impact (distribution of positive and negative impacts) and the sensitivity of the receptor (severity of the impact on people, environmental assets or economic sectors to identified impacts). The impact rating was assessed taking into account existing mitigation measures such as exemptions, discounts and reimbursements, as well as those proposed as part of the proposals. A draft version of the IIA formed part of the consultation materials. Responses to issues raised by the public and stakeholders as part of the consultation, including on the draft IIA, can be found in section 5.

2.4.9 Following consultation, responses from the public and stakeholders have been reviewed and the proposals revisited to ensure that any further potential impacts identified during consultation and engagement were assessed where required and, where considered necessary, further mitigations, enhancements or amendments considered.

2.4.10 The key findings of the updated IIA following consultation are summarised below in Table 2-3 and

2.4.11 Table 2-4. The updated IIA is provided as Appendix C of this report.

Table 2-3: Summary of impacts (Economy and Environment assessments)

Topic	Description of Impacts	Impact rating	Proposed mitigations and enhancements
London's Economy			
Employment	Neutral impacts overall, with potential for minor relative impacts for those using vehicles to work.	0 Neutral	To support EV drivers, it is recommended that we continue to support the delivery of charging infrastructure in central London to enable a sufficient and appropriate level of charging and support the transition from diesel to EVs. In addition, it is recommended that we continue the promotion of alternative cleaner vehicles for freight and servicing, in line with our Cargo Bike action plan (2023), which can offer an alternative option allowing operators to avoid the cost of the Congestion Charge. It is also recommended that we continue to implement wider policies and on street interventions to support further traffic reduction and journey time savings for those working in the CCZ.
Businesses	Neutral impacts overall, with potential for both minor negative and positive impacts for some sectors.	0 Neutral	Continue to bring forward policies and programmes to support MTS objectives in central London. To support businesses using EVs, it is recommended that we continue to support the delivery of charging infrastructure in central London to enable a sufficient and appropriate level of charging and support the transition from diesel to EVs. In addition, it is recommended that we continue the promotion of alternative cleaner vehicles for freight and servicing, in line with our Cargo Bike action plan (2023), which can offer an alternative option allowing operators to avoid the cost of the Congestion Charge.
London's wider economy	Neutral impacts overall, with impacts likely to be negligible given the small comparable size of the charge increase with London's economic output.	0 Neutral	Further measures to continue to reduce traffic and congestion in central London, enabling travel time savings and increased productivity in the CCZ.
London's Environment			
Air quality	Minor reduction in annual emissions of NO _x , PM ₁₀ and PM _{2.5} within the CCZ	+1 Minor Positive	Further measures to continue to improve traffic reduction and sustainable mode share will enhance the reduction in NO _x and PM pollutants.

Topic	Description of Impacts	Impact rating	Proposed mitigations and enhancements
	during charging hours, against the 'Do Nothing' ¹¹ scenario.		It is recommended that we continue to support the delivery of charging infrastructure in central London to enable a sufficient and appropriate level of charging and support the transition from more polluting vehicles to EVs. Continue the promotion of alternative cleaner vehicles for freight and servicing, in line with our Cargo Bike Action plan (2023).
Climate change	Minor reduction in annual emissions of CO ₂ within the CCZ during charging hours, against the 'Do Nothing' scenario.	+1 Minor Positive	Further measures to continue to improve traffic reduction will enable a reduction on CO ₂ pollutants. It is recommended that we continue to support the delivery of charging infrastructure in central London to enable a sufficient and appropriate level of charging and support the transition from more polluting vehicles to EVs. Continue the promotion of alternative cleaner vehicles for freight and servicing, in line with our Cargo Bike action plan (2023).
Noise	Overall neutral impact on the noise environment. Minor positive impact expected on noise levels, however not expected to be perceptible by people.	0 Neutral	Further measures to continue to improve traffic reduction will enable a reduction in noise coming from road traffic. It is recommended that we continue to support the delivery of charging infrastructure in central London to enable a sufficient and appropriate level of charging and support the transition from more polluting vehicles to EVs. Continue the promotion of alternative cleaner vehicles for freight and servicing, in line with our Cargo Bike action plan (2023).

Table 2-4: Summary of impacts (People assessment)

Topic	Description of Impact	Equality Groups Impacted	Impact Rating	Potential Mitigation and Enhancement
Crime Reduction and safety	Neutral impact on crime and fear of crime.	Black, Asian and minority ethnic people, disabled people, older people and children may disproportionately benefit from	Minor positive (+1)	To help ensure that public transport is a safe alternative mode for people who switch modes and have a fear of crime or harassment, it is recommended that we

¹¹ 'Do Nothing' is what would happen without further intervention – it means that the charge level remains at £15 and the CVD ends. This is the default position, since 2018 when the CVD was established. The proposals would change this, offering a new CVD and support for EV drivers for longer.

Topic	Description of Impact	Equality Groups Impacted	Impact Rating	Potential Mitigation and Enhancement
	Minor positive impact on road safety in the CCZ due to reductions in traffic.	minor improvements in road safety, as they are at greater risk from road collisions in London.		continue to reduce the risk and increase public awareness of how to act in the event of crime or harassment on our network through marketing campaigns and ensure that our network staff are trained to effectively deal with instances of crime and harassment. In addition to further improving safety and security measures across our network through measures such as improved lighting and enhanced CCTV coverage. To help ensure that improvements in road safety are realised and enhanced, it is recommended that we continue to seek opportunities to increase the attractiveness of cycling and walking and bus to promote use and reliability of these modes where appropriate, and further increase potential for people to travel using active modes in a safe environment. It is also recommended that we ensure there is awareness of the changes to the Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent Discount for back to base car club EVs based in bays in the CCZ, if our recommended modifications are approved.
Accessibility, Connectivity and Social Integration	Minor positive impact on travel by active and sustainable modes. Minor negative impact on community groups.	<u>Impact on community groups, charities, and access to community groups:</u> Disabled people, Young People, Older People, Homeless People, Asylum Seekers and Refugees, People on Low Incomes may be	Minor Negative (-1)	It is recommended that we continue to seek opportunities to increase the attractiveness of cycling and walking and bus to promote use of these modes, and further increase potential for people to travel using reliable

Topic	Description of Impact	Equality Groups Impacted	Impact Rating	Potential Mitigation and Enhancement
	Minor negative impact on access to community groups. Minor negative impact on charities. Minor negative impact on access to religious services. Neutral impact on access to education	disproportionately negatively impacted. <u>Impact on access to religious services:</u> Religious people, Disabled people, Young People, Older People, People on Low Incomes may be disproportionately negatively impacted.		public transport, and active modes in a safe environment. It is recommended we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on private vehicle use including our discounts available for vehicles with nine+ seats, the 100 per cent Blue Badge discount and our Dial-a-Ride service in addition to the Taxicard scheme. It is also recommended that we ensure there is awareness of the proposed changes to the Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the CCZ, if our recommended modifications are approved.
Health and Health Inequalities	Minor positive impact on mental and physical health due to changes in traffic levels against the 'Do Nothing' scenario. Minor positive impact on air quality against the 'Do Nothing' scenario. Neutral impact on noise. Neutral impact on access to health and social care facilities.	Minor positive impact on mental and physical health due to positive changes in traffic levels, and air quality, disproportionately positively impacting older people, younger people, disabled people, people from Black, Asian and minority ethnic backgrounds, and people on low incomes. Minor negative impact on access to residential, informal and domestic care provision, disproportionately negatively	Neutral (0)	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on travel by private vehicle to access or provide health and social care including the 100 per cent Blue Badge holder discount, and the NHS patient reimbursement scheme.

Topic	Description of Impact	Equality Groups Impacted	Impact Rating	Potential Mitigation and Enhancement
	Minor negative impact on access to residential, informal and domestic care provision.	impacting older people, and disabled people.		
Access to Jobs and Training	Minor negative impact on carers on low incomes providing services to vulnerable groups by private vehicle, where charge is not covered by their employer or providing informal care due to the proposed charge level increase. Neutral impact on access to work or training for people who face barriers to travel by public transport or active travel. Neutral impact on NHS workers. Minor negative impact on low-income workers or private hire vehicle (PHV) drivers that require to travel to work in the CCZ during charging hours who do not qualify for the proposed new CVD, and the charge is not passed on to the customer or covered by the operator/employer, due to the proposed charge level increase. This impact is considered minor due to the small proportion of workers operating primarily in the CCZ unable to pass on the charge or have it covered by their employer.	Negative impact on care workers may have a disproportionately negative impact on Black, Asian and minority ethnic women due to the demographics of the industry. The impact on carers may lead to minor indirect negative impacts on disabled people and older people reliant on formal and informal care provision. Negative impact on PHV drivers may have a disproportionately negative impact on Black, Asian and minority ethnic and Muslim men due to the demographics of the PHV industry in London. The impact on PHV drivers may lead to minor indirect negative impacts on disabled people and older people reliant on PHVs for door-to-door transport.	Minor negative (-1)	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for carers and care workers (including PAs), including our discounts available for vehicles with nine+ seats and the 100 per cent Blue Badge discount and ensure that our NHS staff and patient reimbursement scheme continues to be available for those who may require use of it. It is also recommended that we ensure there is awareness of the proposed changes to Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the CCZ, if our recommended modifications are approved.
Protected Characteristics and	While the proposed new CVD will provide a benefit for those with EVs compared to a do-nothing scenario, the proposed charge level increase may have a disproportionate negative impact on	People on low incomes, Black, Asian and minority ethnic people, older people and disabled people may experience a minor disproportionate negative impact	Neutral (0)	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on travel by private vehicle to access

Topic	Description of Impact	Equality Groups Impacted	Impact Rating	Potential Mitigation and Enhancement
Disadvantaged Groups	people on low incomes without an EV required to drive in the CCZ, particularly for those less able to use alternative modes to travel, including carers and PHV drivers. Due to the demographics of these sectors, it may lead to secondary negative impacts on Black, Asian and minority ethnic women (carers) and Black, Asian and minority ethnic Muslim men (PHV drivers). This may also have a minor disproportionate negative impact on older people, disabled people and people from certain Black, Asian and minority ethnic groups who are more likely to be on low incomes. Disproportionate negative impact on people on low incomes due to the proposed changes to the Residents' Discount, due to the barriers to ownership of an EV people on low incomes may face. This may also have a minor disproportionate negative impact on older people, disabled people and people from certain Black, Asian and minority ethnic groups who are more likely to be on low incomes. Minor positive impacts on traffic levels and subsequently road safety and air quality.	due to the proposed charge level increase and proposed changes to the Residents' Discount. Older people, younger people, disabled people, people from Black, Asian and minority ethnic backgrounds, and people on low incomes may experience a disproportionate positive impact from minor positive impacts on traffic levels and subsequently road safety and air quality.		or provide health and social care including the 100 per cent Blue Badge discount, and the NHS staff and patient reimbursement scheme. It is also recommended that we ensure there is awareness of the proposed changes to the Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the CCZ, if our recommended modifications are approved.

2.5 Recommended modifications

- 2.5.1 As set out above, we have reviewed all responses received from the public and stakeholders and have considered whether in light of these comments there is a need to mitigate the impacts of the proposals set out in section 2.3 above and propose some modifications. Our response to all issues raised is provided in detail in Chapter 5 of this report, with each proposal considered in turn.
- 2.5.2 We are recommending the proposals relating to the charge level increase and the introduction of a new CVD are implemented without any changes. We are also recommending that the Mayor issues the revision to the Mayoral Guidance as consulted on.
- 2.5.3 During consultation, certain stakeholders raised concern regarding the potential impacts of the changes to the Residents' Discount on low-income and disabled residents of the CCZ. As such, we have developed two mitigations (A and B below).
- 2.5.4 Mitigation A addresses concerns related to potential impacts on low-income and disabled residents, to 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 (see section 10.3.5 of the IIA). Mitigation B also responds to the issue concerning low-income residents who can't access an EV, while it may also provide an alternative to car ownership for those that live in the CCZ.
- 2.5.5 We are recommending the following two modifications as further mitigations to the proposed changes to the Residents' Discount.

Mitigation A: extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030

- 2.5.6 We propose to extend the current vehicle eligibility criteria to qualify for the Residents' Discount for new applicants in receipt of certain benefits (including low-income). The new vehicle eligibility criteria are proposed to apply from 1 March 2027, however, in response to feedback we intend to adjust the rules for residents in receipt of certain benefits. These residents need not have an EV in order to qualify for the Residents' Discount between 1 March 2027 and 4 March 2030 (i.e. their vehicle's fuel type will not be relevant to determining eligibility for the Residents' Discount) and will receive grandparent rights going

forward (a 90 per cent discount regardless of their vehicle's fuel type) if registered before the latter date. The qualifying benefits are¹²:

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

2.5.7 Grandparent rights may only be exercised if the resident continues to satisfy all the other eligibility criteria and makes timely renewals.

2.5.8 This modification would serve as a mitigation for residents in receipt of certain benefits, including low-income and disabled residents, due to their potential reduced ability to own or access an EV. For disabled residents applying after March 2027, if they do not receive the 100 per cent Blue Badge discount or disabled tax class vehicle exemption, and for whom switching modes is unviable, the reduced ability to own an EV may be resultant of factors including a lack of accessible charge points, the potential barriers relating to the technology, and need for an adapted vehicle (in relation to availability and associated costs for adaptations).

2.5.9 The draft IIA recognised that our proposals could have a potential minor negative impact on low-income residents, disabled people and older residents 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 100 per cent 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.

Mitigation B: 100 per cent discount for car club EVs based in bays in the CCZ

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

¹² The benefits are aligned with the changes to benefits taking place which would see some subsumed by Universal Credit from March 2026.

Discount for existing and future residents including those on low incomes who may require a vehicle to travel and for whom it may be harder to access EVs, without which they would have to pay the full user charge for travel in the CCZ within charging hours from 2030. This discount will act as an incentive for residents to use these vehicles, rather than purchase a vehicle in advance of the Residents' Discount changes coming into place. The car club must be the registered keeper of the EV and the EV must be driven by the member of the car club. The discount excludes vehicles which are licensed as private hire vehicles (PHVs).

- 2.5.11 This mitigation is specifically intended for residents in the Residents' Discount zone who need to use a vehicle from time to time but are unable or do not wish to privately own or lease an EV. The rental cost of the car club EV and the 'back to base' nature of the hire arrangement minimise unnecessary or 'dead' mileage thereby reducing the traffic and congestion impacts of the discount. For data protection and administrative reasons, the discount is not, however, limited to car club members who are residents in the Residents' Discount zone. We will not seek to collect data on individuals using this mitigation nor will we request that car clubs share any such data with us.
- 2.5.12 Car club EVs which are also licensed as PHVs are, however, excluded from this mitigation since they are likely to generate additional traffic and congestion in the CCZ given they will be driven in the zone without passengers for at least part of the time, and the rental costs is able to be offset by fares from passengers. Residents who are also PHV drivers may continue to be able to benefit from the Residents' Discount, the 100 per cent Blue Badge discount or the exemption for wheelchair-accessible PHVs carrying out a booking.
- 2.5.13 It is considered that this modification will help to further mitigate the impacts of 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 for the extended period) for the changes to come into effect. This would come into effect at the same time as most of the other changes, 2 January 2026.

3 **Consultation process**

3.1 Introduction

- 3.1.1 This chapter provides an overview of the consultation that was undertaken, including methods used to publicise the consultation.
- 3.1.2 The primary objective of the consultation was to obtain public and stakeholders' views on our proposals including whether the impacts had been accurately assessed. Views were also sought on the importance of reducing traffic and encouraging uptake of sustainable modes.
- 3.1.3 Mayoral guidance as to the procedure which we are expected to follow when proposing changes to a road user charging scheme was considered and informed how the consultation was conducted.
- 3.1.4 The consultation ran for eleven weeks, opening on 27 May 2025 and closing on 11 August 2025. The consultation was extended by one week due to additional information we published during the consultation period in respect to a specific request for information. We describe this in more detail in section 3.2.24 of this chapter.

3.2 Publicising the consultation

- 3.2.1 An extensive marketing campaign was delivered to raise awareness of the consultation and encourage the public and stakeholders to have their say. The following section outlines the main marketing methods we used. The campaign was intended to raise awareness that the consultation was taking place and describe what channels were available for potential respondents to take part.

Press release and media reaction

- 3.2.2 On the day of the consultation launch we issued a press release to media outlets. A copy of the press release is provided in Appendix B. The press release received attention from national, regional and local media outlets from across print, online, radio and television. Table 3-1 lists some of the media reaction to our press release on 27 May 2025. Additional media reaction is provided in Appendix B.

Table 3-1: Media reaction to press release issued on consultation launch

Media channel	Type
BBC One	Television broadcast
BBC Radio London	Radio broadcast
Daily Mail	Newspaper and/or news website publication
Financial Times	Newspaper and/or news website publication
GB News	Newspaper and/or news website publication
ITV Evening News	Television broadcast
LBC Radio	Radio broadcast
London Standard	Newspaper and/or news website publication
Sky News	News website publication
The Telegraph	Newspaper and/or news website publication
The Times	Newspaper and/or news website publication

Digital advertising

3.2.3 We engaged the marketing agency Wavemaker to run a digital advertising campaign during the consultation. Our campaign ran on Meta from 10 July to 6 August, reaching 8.5 million unique users. Reach delivery was highest among younger audiences, with 2.8 million people aged 25–34 years old and 2.07 million 18–24-year-olds reached. Further detail on our digital advertising campaign, including a copy of the digital adverts deployed, is provided in Appendix B.

Email campaign

3.2.4 Upon launch of the consultation and then again towards the end, we sent emails to 298,755 customers registered for updates via our Customer Relationship Management (CRM) system. This included customers who were registered for the Congestion Charge, CVD, Residents Discount and with an Auto Pay account. A full list of customer groups we contacted via CRM is provided in Appendix B.

3.2.5 We also sent emails to all those who took part in our previous consultation in 2021 on Congestion Charge proposals and who had consented to be contacted by us – this amounted to 2,555 customers. In addition to these, we emailed 48,708 people who had registered for updates on our consultations through our Have Your Say online platform.

Press advertising

3.2.6 We advertised the consultation throughout the consultation period, and across a number of press titles (Table 3-2). A copy of our press advertisement is included in Appendix B.

Table 3-2: Press titles where we advertised the consultation

Press titles	Date of publication(s)
Brent & Kilburn Times	24 July 2025
Camden New Journal	24 July 2025
City AM	15 July 2025; 22 July 2025; 29 July 2025
Docklands & East London Advertiser	24 July 2025
Greenwich & Lewisham Weekender	23 July 2025
Islington & Hackney Gazette	24 July 2025
Newham & Stratford Recorder	23 July 2025
Southwark News	24 July 2025
West London Gazette	23 July 2025
Wimbledon & Wandsworth Times	24 July 2025

3.2.7 There was a full-page feature about the consultation in the Metro newspaper¹³ at the start of the consultation. This feature appeared on 29 May 2025. A second feature was included in the Metro towards the end of the consultation period on 8 August 2025. A copy of each is included in Appendix B.

3.2.8 We published a notice in the London Gazette that the 2025 Variation Order had been made and invited representations to be made on the amendments it included, as recommended by the Mayoral Guidance. The notice appeared in the online London Gazette on 27 May 2025 and in the print version the following day. A copy is included in Appendix B.

¹³ The Metro is a free national newspaper with a daily distribution of approximately 1.4 million copies facilitated by extensive networks across the UK. A significant portion of the circulation, over 60 per cent, is in London, distributed through London Underground stations, bus routes, and railway stations. The newspaper also utilizes 3,200 distribution points across the UK to reach its target commuter audience.

Social media

3.2.9 We promoted the consultation through our social media channels of Facebook, LinkedIn, YouTube and X. On YouTube we published a short video describing the consultation proposals; this video was also embedded on our consultation webpage. On Facebook, LinkedIn and X, we published posts promoting the consultation at the beginning, middle and end of the consultation period. Combined, all posts reached 293,000 unique users. A copy of the posts and a breakdown of the reach across each channel is provided in Appendix B.

Poster and leaflet campaign

3.2.10 We displayed large-sized consultation posters in London Underground and Elizabeth line stations during the consultation period, including stations in the CCZ and stations close by. We also placed posters and leaflets advertising the consultation in local libraries in the area. A list of locations is provided in Appendix B.

Other channels used to publicise consultation

Taxi and PHV drivers

3.2.11 In our trade magazine On Route, issued to all taxi and PHV drivers in London, we published a full-page feature describing the consultation proposals in our summer 2025 issue.¹⁴ Additionally, drivers regularly engage with us in-person at our Pier Walk offices – including for registration and testing purposes. During the consultation period, we handed our consultation flyers to these drivers as they ‘passed through’ our offices to further promote the consultation.

Residents of the CCZ area

3.2.12 We engaged with officers in the boroughs in which the CCZ is located to ask that they use their own communication channels to promote the consultation. The boroughs of Camden, Lambeth, Southwark and Westminster and the City of London were all engaged to include a promotion of the consultation in their borough newsletters to local residents.

Accessibility and disability groups

3.2.13 We advertised in a UK online disability magazine run by Busy Life through their website, social media and a newsletter to their members. We also promoted the consultation in a regular newsletter we send to accessibility and disability groups based in London.

3.2.14 Copies of the above promotions are included in Appendix B.

¹⁴ Available on content.tfl.gov.uk/onroute-summer-2025-issue-38.pdf

Stakeholder engagement

3.2.15 On the day of the launch of the consultation we contacted stakeholders to provide them with information about the consultation. We contacted MPs, Assembly Members, local councillors and officers. We also contacted a diverse range of stakeholders including businesses, taxi and private hire representative organisations, freight representative organisations and community groups. A list of the stakeholders we contacted is included in Appendix F.

3.2.16 We contacted all the stakeholders we had emailed at the start of the consultation again by email on 30 July 2025, to remind them that the consultation would be closing soon and to encourage them to submit a response if they had not already done so.

3.2.17 We also had conversations with a number of stakeholders who requested to meet with us. These are set out in Table 3-3.

Table 3-3: List of stakeholder meetings

Stakeholder	Type	Date of meeting
AICES (Express Freight Association)	Trade body	23 June 2025
Bexley Transport Users Committee	Community	17 July 2025
British Vehicle Rental and Leasing Association	Trade body	20 June 2025
BusinessLDN	Advocacy group	03 June and 21 July 2025
Central Marylebone Residents Group	Community	31 July 2025
Clean Cities	Campaign group	18 July 2025
CoMoUK	Trade body	24 June 2025
Federation of Masters Builders	Trade body	17 June 2025
Federation of Small Business (FSB)	Trade body	18 July 2025
Freight stakeholders (weekly call)	Business/industry	28 May and 9 July 2025
Friends of the Earth	Campaign group	30 July 2025
Healthy Air Coalition	Campaign group	18 July 2025
Independent Disability Advisory Group (IDAG) ¹⁵	Accessibility/disability	26 June 2025
Institute of Couriers	Trade body	03 July 2025
London TravelWatch	Travel Watchdog	26 June 2025

¹⁵ Our Independent Disability Advisory Group (IDAG) is a panel of 13 members, appointed for their lived experience of disability, as well as their extensive expertise and knowledge of the key issues and barriers to accessing public transport.

NHS Travel and Transport Group	Community	01 July 2025
Society of Motor Manufacturers and Traders (SMMT)	Trade body	14 July 2025
Uber	Business/industry	02 June 2025
Zipcar	Business/industry	17 June 2025

Consultation materials and channels for responding

3.2.18 We described our proposals for changes to the Congestion Charge via our online consultation portal, in common with all other TfL consultations. The portal included a questionnaire which respondents could complete if they wished. Our consultation portal included the following information to help respondents understand our proposals and prepare an informed response to them:

- A summary of the proposals
- A map of the CCZ
- Easy read versions of the materials and survey
- British Sign Language video and audio
- Supplementary Information, which contained more detailed information on the proposed changes to the Congestion Charging scheme and why we are proposing them
- A draft Integrated Impact Assessment
- The 2025 Variation Order which sets out the proposed amendments to the Congestion Charging Scheme Order which are needed in order for the consultation proposals to have effect
- The draft consolidated version of the Congestion Charging Scheme Order
- The proposed draft revisions to the Mayoral Guidance
- A copy of the consultation questionnaire available as a printable document and returnable to our Freepost address.

3.2.19 Our consultation questionnaire (included in Appendix B) consisted of a series of closed questions and two open questions, as follows:

- Closed questions asking respondents to rate how important they felt it was for us to reduce congestion and how effective the proposals would be at achieving the aims
- Open questions providing respondents with the opportunity to raise any further comments on the proposals and possible impacts from them
- A further series of closed questions to understand respondents' experience and travel within the CCZ
- A range of demographic questions, which were asked through the registration process for the consultation
- Closed questions about how respondents considered aspects of the quality of the consultation, as well as an open question for comments.

3.2.20 Respondents were free to submit a response to the consultation by completing our online consultation questionnaire, in writing to our email address haveyoursay@tfl.gov.uk, or Freepost address 'Freepost TfL Have Your Say'.

Analysing the outcomes

3.2.21 We 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. All comments and suggestions received, whether by email, letter or through our online questionnaire were reviewed in order to identify the issues raised by respondents (please see Chapter 4 and Chapter 5 for a summary of this analysis).

3.2.22 AECOM developed a 'code frame' for the two open questions. A code frame is a list of the issues raised during the consultation; together with the frequency each was raised. Every open text response was analysed and either a new code was created for each substantive point raised or the response was added to one or more of the existing codes within the code frame. Each response could be coded into multiple codes, if more than one issue was raised by the individual. Where it was determined that a comment was providing context to an issue, rather than forming a separate point, these did not form a separate code.

3.2.23 The coding was carried out by highly experienced coders and underwent checks for consistency.

An amendment to consultation materials, additional data and extension to the consultation end date

3.2.24 During the consultation period we made some minor amendments to the consultation materials and, as a result, we wrote to all respondents to the consultation to explain the changes we made. We also published additional data on the consultation portal in the interests of transparency following two requests for further information. We informed anyone who had already submitted their response that we had done so and gave them the opportunity to change or supplement their response if they wished to do so. We extended the consultation by one week to allow everyone three weeks to consider the additional data when preparing or supplementing their response.

3.2.25 The timeline and specific information provided were as follows:

- On 4 July 2025, we made some minor corrections to two of our consultation documents, the Supplementary Information and Draft Integrated Impact Assessment, to correct the statistic relating to the number of EVs seen in the CCZ on an average weekday during charging

hours. The correct number was 16,589 EVs instead of 16,568 (a difference of 21). It was also clarified that the figure related to a weekday average rather than a weekday and weekend average as the original footnote had stated. For completeness, the equivalent statistic for a weekend day was also provided. The amended documents were uploaded to the webpage on 4 July 2025. The updated version of each is included in Appendix A and C respectively. We have also included the message we sent to respondents explaining the corrections. This email was sent to 2,259 people who had responded to the consultation at that point.

- On 18 July 2025, we published a note setting out the additional data that had been requested pursuant to the Environmental Information Regulations 2004 (“EIR”). The data related to the following impacts: the hypothetical scenario with a ‘100 per cent CVD’; London-wide traffic and emissions and congestion; and revenue. As is standard practice, our response to the EIR request was published on our transparency webpage but we also decided to provide a link to the information on our consultation portal so it was specifically signposted to anyone who was interested in the consultation. We also wrote to the 2,477 respondents who had so far responded to make them aware that the additional data had been published and that they could update their response or submit a new one if they wanted to do so. We extended the consultation end date by one week to everyone allow extra time to consider the additional information published. A copy of the note we published and the message we sent to respondents is provided in Appendix B.

4 Consultation responses

4.1 Introduction

- 4.1.1 This chapter explains our consultation analysis methodology, the number of responses we received, who they were from, the outcomes of the consultation, and feedback on the quality of the consultation. Further detail on the results and additional analysis and illustrative quotes are included in the consultation analysis report by AECOM (Appendix E). We respond to the issues raised in Chapter 5.

4.2 Methodology

Receiving responses

- 4.2.1 Most responses were received via the consultation questionnaire hosted on our consultation portal. To support inclusivity, we also gathered responses via email. An “easy read” version of the questionnaire was also available - the questions were the same in both the standard and “easy read” versions. A printable version of the questionnaire was also made available via our portal. We also provided the option for respondents to submit a “quick response” instead of completing the full survey, just asking a single question to gain their thoughts on the proposals.
- 4.2.2 We collated all responses received by methods other than the online questionnaire, including those received by post, and provided them to AECOM, along with the questionnaire responses, in weekly batches for processing for processing, analysis, and reporting.

Petitions and organised responses:

(i) Petitions

- 4.2.3 We did not formally receive any petitions¹⁶ during the consultation period. We were made aware of petitions that stakeholders ran as well as other petitions that were organised online. However, as these petitions were not submitted to us, we have not included them in our report or analysis.

(ii) Organised responses

¹⁶ A petition is a form of campaign response, typically organised by an individual or group. A petition is characterised by being presented in the form of a ‘petition prayer’ with accompanying evidence of the number of signatories. These may be submitted to us by email, via an online campaign website, or in writing.

- 4.2.4 When analysing the consultation responses, it was apparent there were two organised responses. An organised response is where a stakeholder or group of stakeholders encourage their members or supporters to respond to the consultation in a specified way, typically either in support of or opposition to the proposals.
- 4.2.5 The organised responses identified were:
- **Zipcar:** a total of 42 responses were received. Some of these were received as emails containing Zipcar's standard response text, while the rest were received through our online survey's free-text option (Q16). Most respondents used the standard text when responding, though some added their own additional comments to the standard text.
 - **Routemaster buses:** a total of 152 responses were received via our online questionnaire.
- 4.2.6 Please note that we have received similar responses to the majority of TfL's public consultations for more than the last 12 months. These responses are predominantly characterised as expressing the opinion that TfL should do more to increase the number of Routemaster buses used across London's bus network.
- 4.2.7 The use of Routemaster buses in London is outside the scope of this consultation and any comments received on this topic would have been analysed and coded as 'out of scope'.
- 4.2.8 All organised responses were read by our consultation team and shared with AECOM for analysis as part of the consultation.
- 4.2.9 Respondents on behalf of Zipcar and Routemaster buses were able to change the text of answers offered as standard before submitting for both campaigns. Where additional comments were made to the standard text, we analysed and coded these as appropriate. The standard responses provided by these campaigns are shown in Appendix E, as well as further information about the responses.
- (iii) For information*
- 4.2.10 We also received three consultation responses expressing a shared opinion on behalf of a group of stakeholders. Each of these responses is provided in full in Appendix G. We have also added a summary of each in our 'stakeholder summaries' section in Appendix G, including a list of signatory names.
- 4.2.11 These responses were received from:
- **'Electric London Coalition':** this consultation response was signed by 27 business and industry groups. The Electric London Coalition's letter received high-profile attention in the media as part of the Evening

Standard's ongoing 'Leading the Charge' campaign. A version of the open letter received as a consultation response was published in the 3 July 2025 edition of the Standard. In addition, the Standard published a number of articles as part of their 'Leading the Charge' campaign during, prior to and after the consultation period.

- **'Support small businesses and charities like us to electrify'**: this consultation response had 93 signatories, representing charities, community interest companies (CIC), education and business groups.
- **'Supporting small businesses and charities to electrify'**: this consultation response letter was signed by 14 business and charity groups.

4.2.12 For our consultation analysis, each of these responses was shared with AECOM, and treated in the same way we would a single stakeholder consultation response i.e. counted once in our analysis rather than by the number of signatories to each letter.

Thematic coding

4.2.13 All free-text responses and emails were grouped into themes to allow meaningful analysis. Letter and email responses were combined with the free-text comments given in the questionnaire for analysis purposes. The full coding tables can be seen in Appendix E.

4.2.14 We have analysed free text responses by the issues raised, rather than by the strict parameters of the survey question asked. This allows for more meaningful analysis of free text responses and ensures all issues raised by a respondent are accounted for, regardless of which free text response they appeared in.

4.2.15 The themes from each question were identified by AECOM using the initial set of responses, and these were verified by us before full coding began. Where new themes emerged, these were verified and confirmed with us before continuing. A minimum of 10 per cent quality assurance checks and validation were completed on the coding for each question by both AECOM and TfL.

Analysis and reporting

4.2.16 The consultation was open to all and, therefore, respondents were self-selecting. This, coupled with the fact respondents could choose which of the questions they answered, means the responses and subsequent analysis should not be viewed as a proportionate representation of the wider population, however it gives a good indication of issues of concern to those interested in the consultation. The profile of respondents is detailed in section 4.3.

4.2.17 As respondents were not obliged to answer all questions in the questionnaire, the percentages shown only include those that responded to each question. The number of people who answered each question is shown as “n=”.

4.2.18 Where percentages do not sum to 100 per cent in the main body of the report, this is due to rounding or where more than one response was permitted.

4.2.19 Statistical significance testing was completed. Where results are reported as different between sub-samples, this means the differences are statistically significantly different. Only data which is significantly different has been referenced in the report.

4.2.20 A large volume of data was received and, therefore, the following chapters summarise the main findings and highlight pertinent differences between groups.

4.3 About the respondents

4.3.1 A total of 4,561 responses were received, of which 1,245 were quick responses¹⁷. We categorised 99 responses as being from stakeholders. The total number of responses not including stakeholders is 4,466.

4.3.2 Of the 4,561 responses, 194 were identified as organised responses.

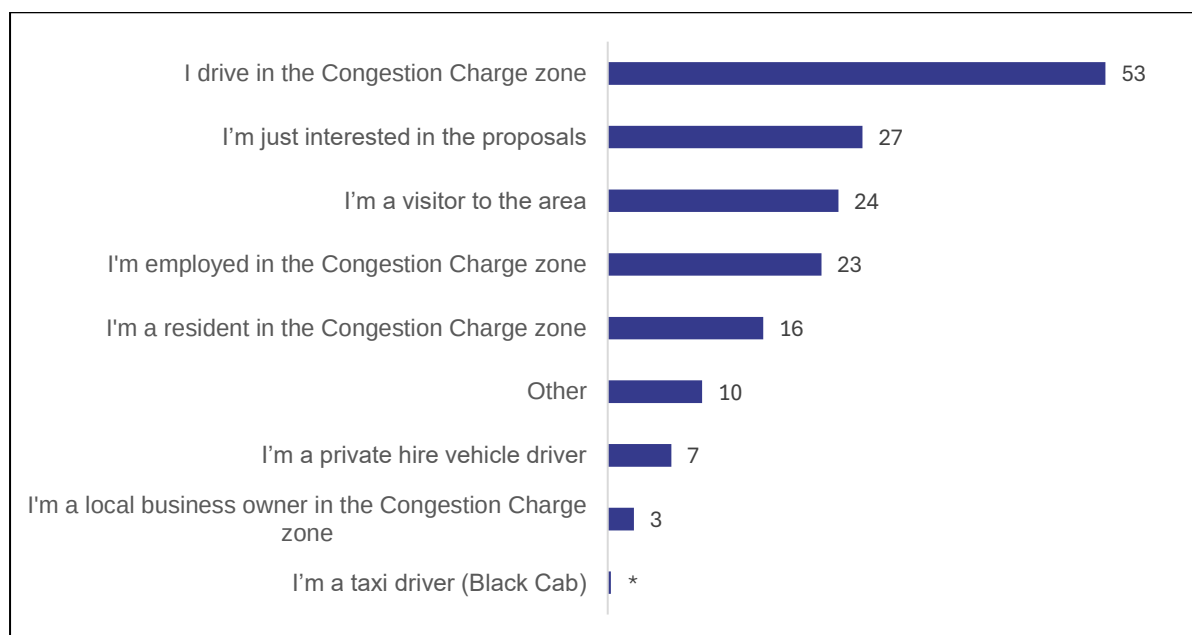
4.3.3 The following analysis of the respondents includes only those who answered through the online survey, not those that responded over email. This includes the organised responses on behalf of Routemaster buses identified in section 4.2.5 above (the second set of organised responses on behalf of Zipcar were received by email).

Type of respondents

4.3.4 The respondents' reason for completing the survey is shown in Figure 4-1.

¹⁷ On our Consultation portal we offer two survey options for respondents to complete: firstly, our full survey including a mix of free-text options and closed questions; and secondly, a simple free-text option for respondents to provide any written comments. The latter is our 'quick response' option.

Figure 4-1: Reason for completing the survey (per cent)



Base: 3,174. Question: What encouraged you to complete this questionnaire? 'I'm interested in the proposals because...'. *Responses less than 1 per cent.

4.3.5 Of the 4,561 total responses received, 3,939 respondents provided a written comment to at least one of the open questions in the survey. For the issues commonly raised throughout the report, the percentages are of respondents who provided a comment to the open question being discussed.

4.3.6 A list of the 99 stakeholders who responded to the consultation is provided in Appendix E.

Respondents' profiles

4.3.7 Respondents were asked to provide details about themselves such as age, gender, and ethnic group. These questions were optional. The percentages in Table 4-1: Respondent age, gender and ethnicity (per cent) are of those who provided this information; not all respondents provided this information, therefore any difference in response by demographic profile should be treated with caution.

Table 4-1: Respondent age, gender and ethnicity (per cent)

	N	per cent (%)
Age		
Under 25	313	12%
25 to 35	343	13%
36 to 45	459	18%
46 to 55	497	19%
56 to 65	481	19%

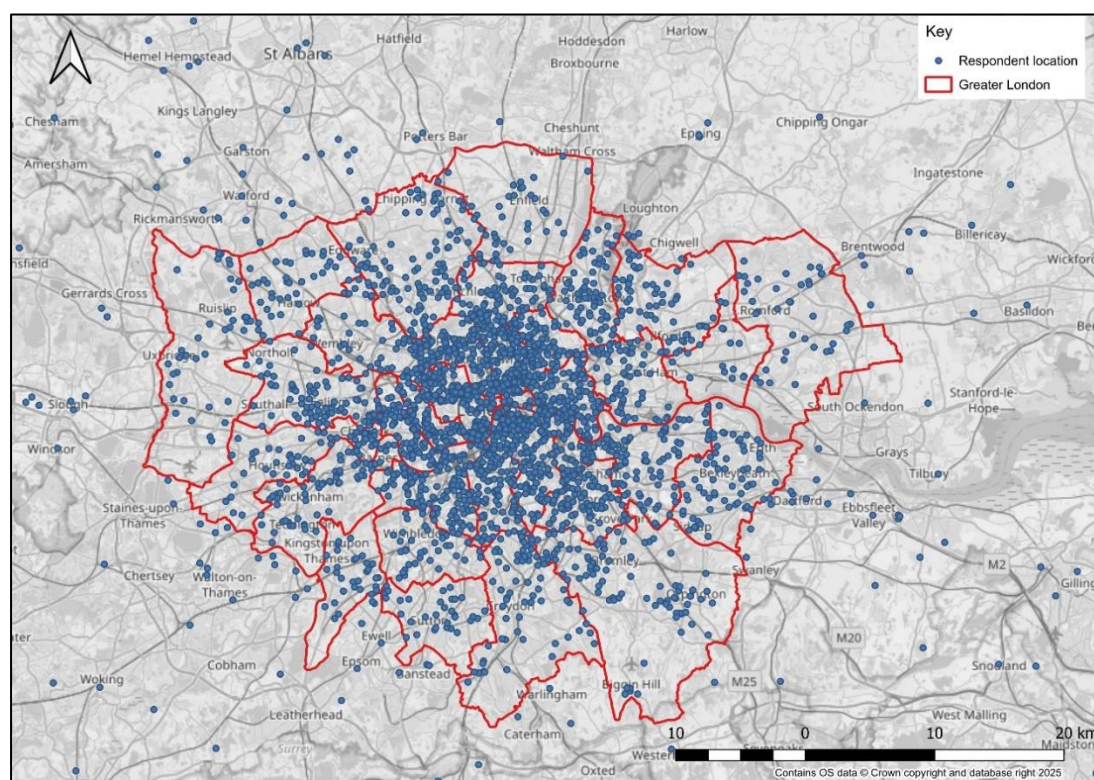
66 and over	471	19%
Total	2,564	100%
Gender		
Male	1,728	66.5%
Female	583	22.5%
Other	291	11%
Total	2,602	100%
Ethnicity		
White (incl. White British, Irish, Other)	1,910	80%
Black, Asian and Minority Ethnic	470	20%
Total	2,380	100%

Base: all respondents who answered questions. Excludes those who responded 'prefer not to say'.

Respondents' locations

4.3.8 Respondents were able, but not required, to provide postcode data as part of the survey. Figure 4-2 shows the location of respondents who provided a postcode.

Figure 4-2: Respondent location map

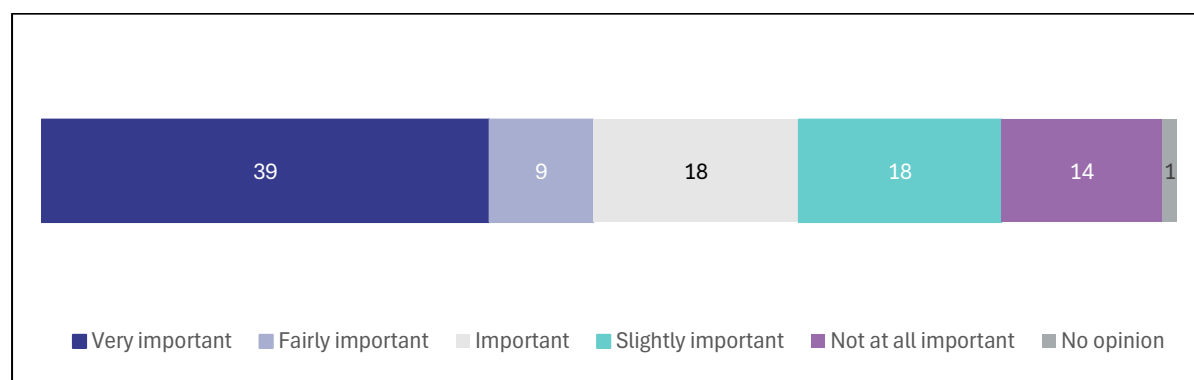


4.4 Travel perceptions

Importance of reducing traffic and congestion in central London

- 4.4.1 Two thirds (66 per cent) of respondents said it was important, fairly important or very important that we take steps to reduce traffic and congestion in central London. A further 18 per cent said it was slightly important, while 14 per cent said it was not at all important.

Figure 4-3: Importance of TfL taking steps to reduce traffic and congestion in central London (per cent)



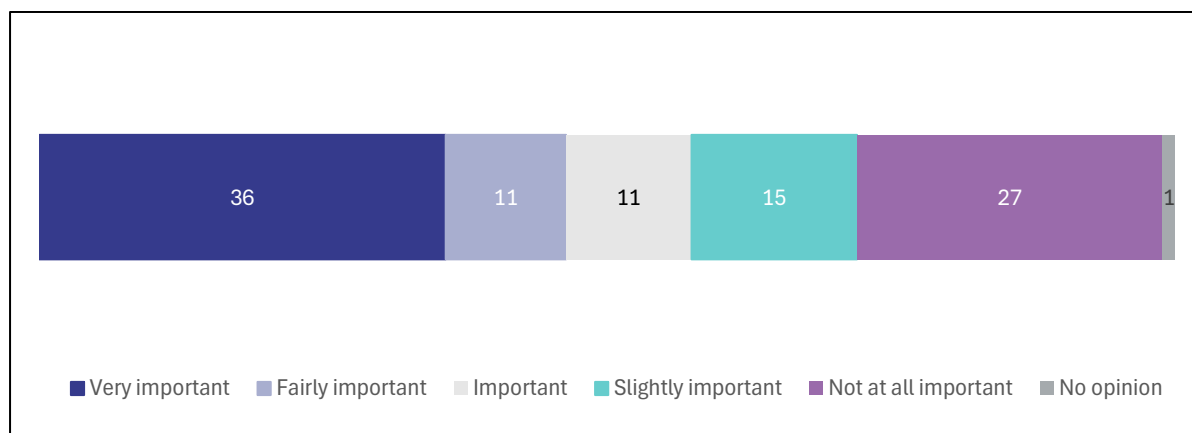
Base: n=3,287, Question: How important is it to you that we take steps to reduce traffic and congestion in central London?

- 4.4.2 Those who said they drive in the CCZ were more likely to say it was not important for us to take steps to reduce traffic and congestion (41 per cent) compared to residents (30 per cent), those employed in the CCZ (32 per cent) and visitors (28 per cent).
- 4.4.3 Those aged under 25 and between 26-35 were more likely to say it was very important to take steps to reduce traffic and congestion in central London (86 per cent and 52 per cent of each age range, respectively).

Importance of encouraging the use of zero emission vehicles in central London

- 4.4.4 Fifty-eight per cent responded that it was important, fairly important or very important that we take steps to encourage the use of zero emission vehicles in central London. A further 15 per cent said it was slightly important. More than one quarter (27 per cent) of respondents said it was not at all important to them.

Figure 4-4: Importance of TfL taking steps to encourage use of zero emission vehicles in central London (per cent)



Base: n=3,175, Question: How important is it to you that we take steps to encourage the use of zero emission vehicles in central London where driving is necessary?

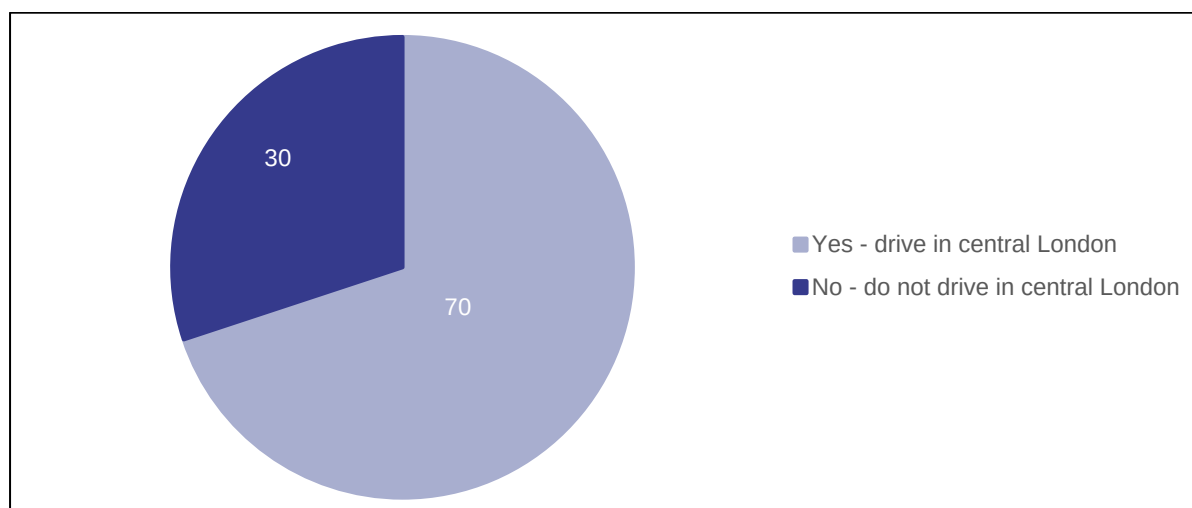
4.4.5 Those aged between 36-45 and 46-55 (43 per cent) were more likely to say it was very important to encourage use of zero emission vehicles in central London.

4.5 Travel behaviours

Driving behaviours in central London

4.5.1 Seventy per cent of respondents said that they drive in central London (Figure 4-5 **Error! Reference source not found.**).

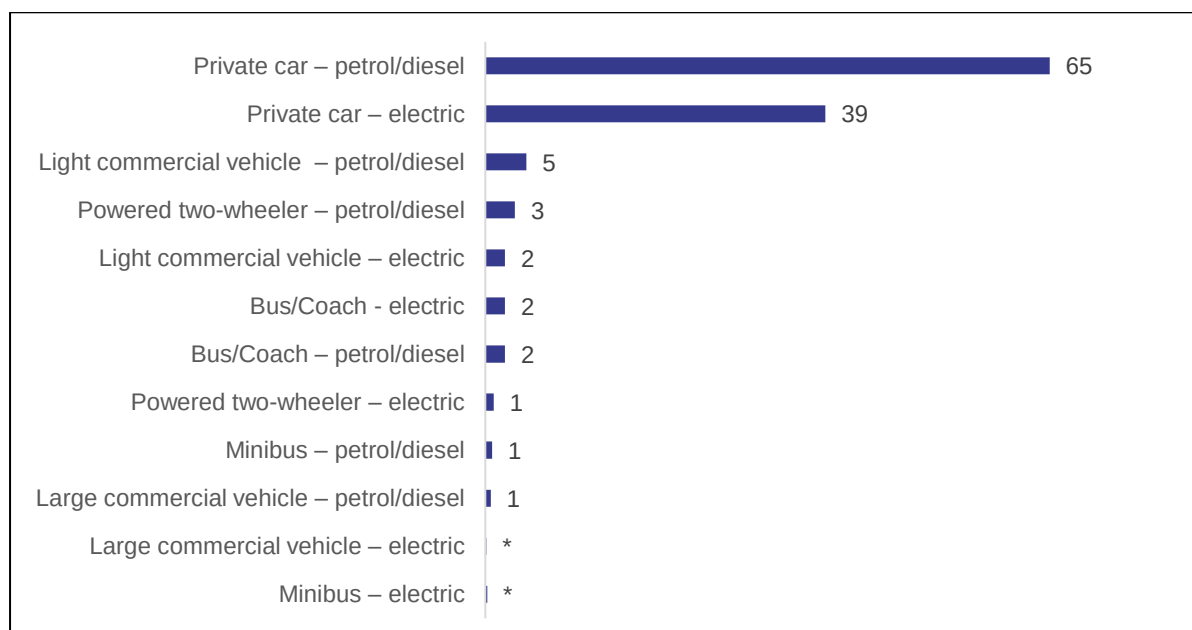
Figure 4-5: Driving in central London (per cent)



Base: n=3,166, Question: Do you drive in central London?

4.5.2 Of those who drive in central London, around two thirds (65 per cent) said they drive a petrol or diesel private car (Figure 4-6Figure 4-6). Thirty-nine per cent (39 per cent) of respondents said they drive an electric private car.

Figure 4-6: Vehicle type driven (per cent)



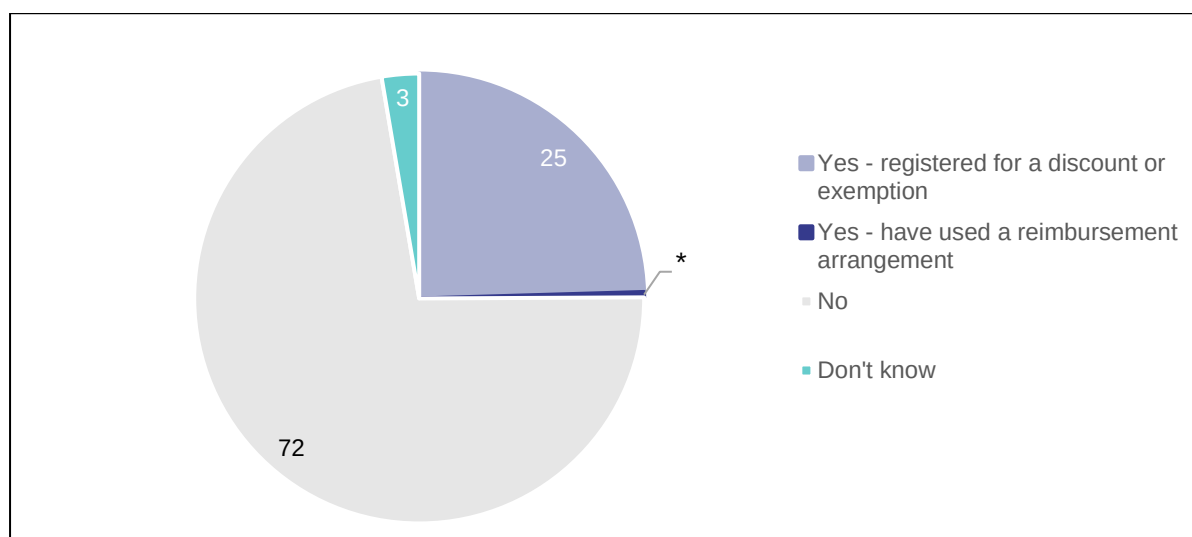
Base: n=2,327, Question: If you drive in central London, what type of vehicle do you usually drive?

*Responses less than 1 per cent

Congestion Charge discounts, exemptions and reimbursements

4.5.3 Just over one quarter (25 per cent) of respondents to the consultation were registered for a discount or had the benefit of an exemption to the Congestion Charge.

Figure 4-7: Registered for a discount, exemption or have a reimbursement arrangement (per cent)

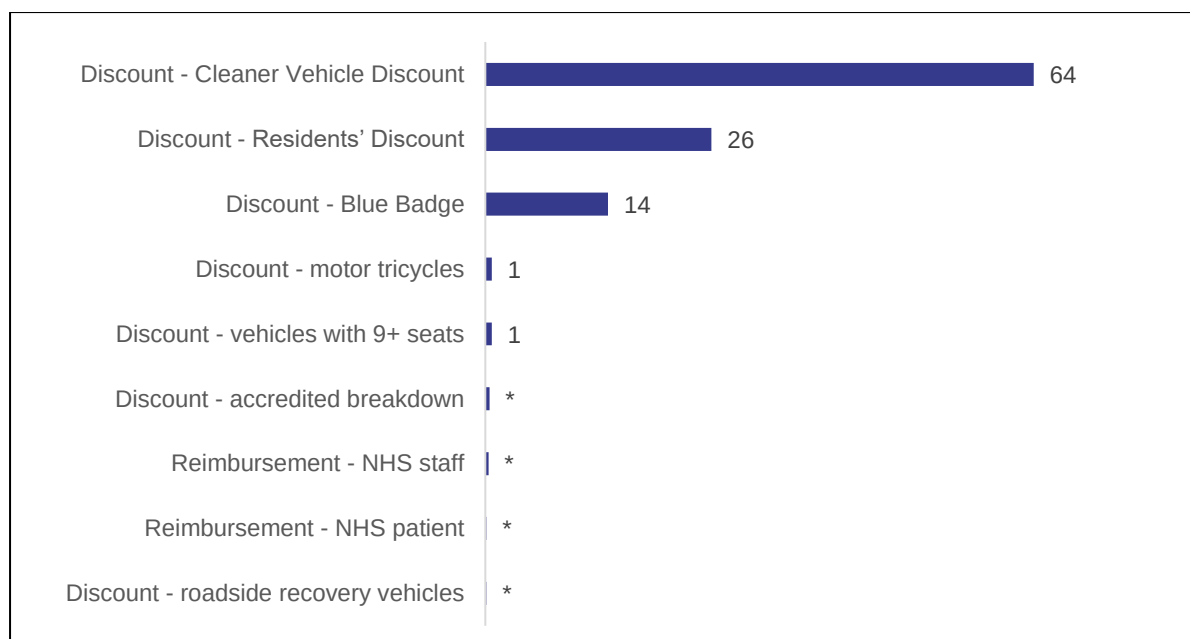


Base: n=3,134, Question: Are you registered for a discount or exemption to the Congestion Charge or have you used a reimbursement arrangement? *Responses less than 1 per cent.

4.5.4 Amongst those who were registered for a discount or exemption or who had used a reimbursement arrangement, just under two thirds (64 per cent) were

registered for the CVD. One quarter (26 per cent) were registered for the Residents' Discount and 14 per cent had a Blue Badge.

Figure 4-8: Discount/Reimbursement type (per cent)

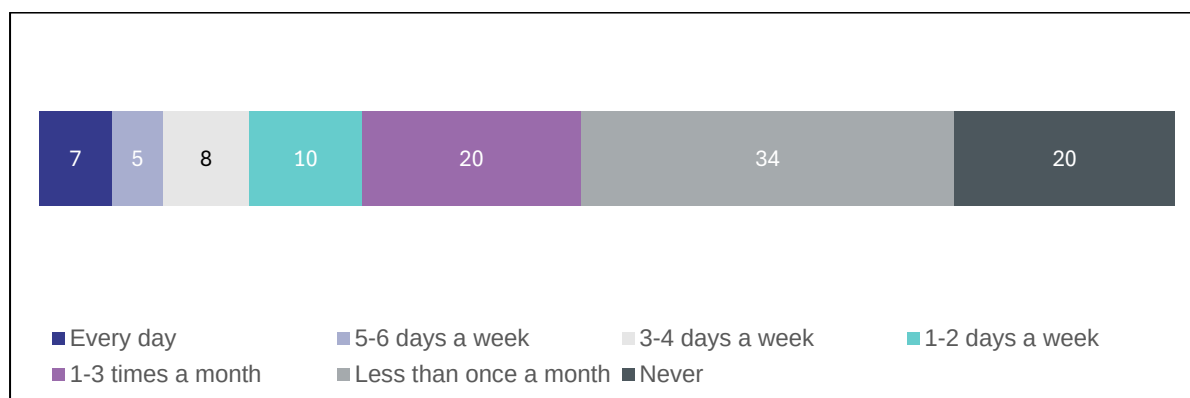


Base: n=801, Question: Please state the discount you are registered for or the reimbursement scheme you have used? *Responses less than 1 per cent.

Frequency of driving in the CCZ

4.5.5 Thirty per cent of respondents said they drive in the CCZ at least once per week, and 12 per cent drive at least five days a week. One fifth (20 per cent) of respondents drive in the CCZ between one and three times a month while a third (34 per cent) said they drive less than once per month. One fifth of respondents said they never drive in the CCZ.

Figure 4-9: Frequency of driving in the CCZ (per cent)



Base: n=3,103, Question: How often do you drive in the CCZ?

Auto Pay accounts

4.5.6 Half (51 per cent) of respondents said they had an Auto Pay account with us (Table 4-2). Around one tenth (11 per cent) of respondents said they did not have an account but intend to register for one.

Table 4-2: Auto Pay account

Response	Count	%
Yes	1,586	51%
No, but I intend to register for a free account	326	11%
No, and I don't intend to register for a free account	1,189	38%

Base: n=3,101, Question: Do you have an Auto Pay account with TfL?

4.5.7 Of those who did have an Auto Pay account, two-fifths (41 per cent) drove in the CCZ on a weekly basis, while a quarter (26 per cent) drove on a monthly basis. A third (31 per cent) drove less than once a month.

4.6 Impact of proposals

Effectiveness of proposals in achieving TfL's aims to manage traffic and congestion in central London

4.6.1 For Proposal A, B and C, respondents were asked how effective they consider each to be in achieving our aims to manage traffic and congestion in central London (Figure 4-10).

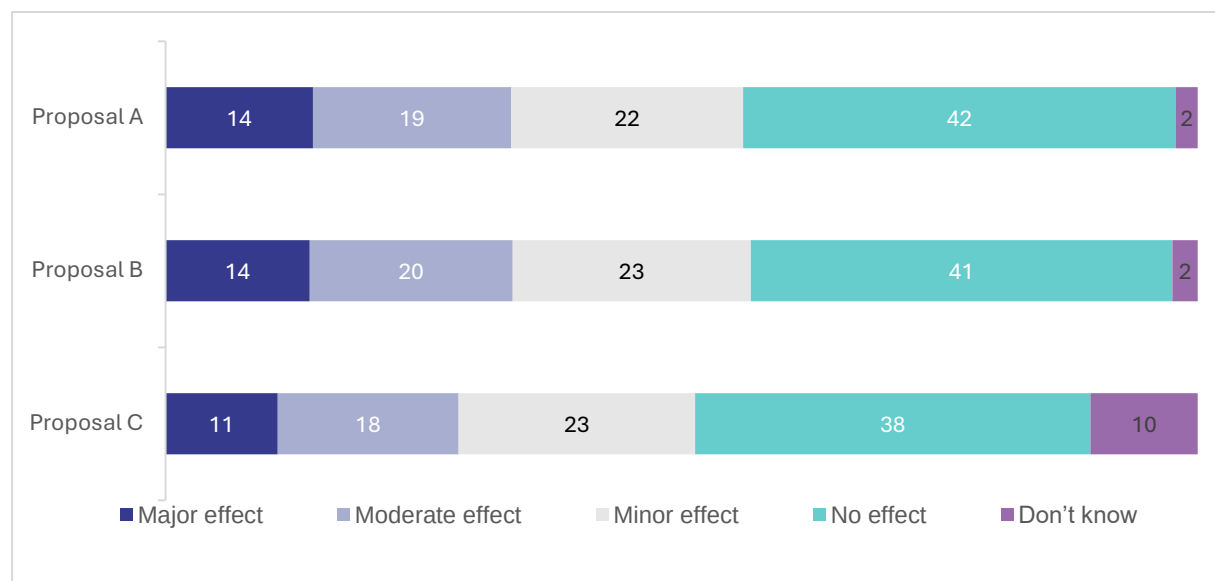
4.6.2 For all three proposals, 42 per cent, 41 per cent, 38 per cent respectively of respondents said they would have no effect.

4.6.3 With regards to Proposal A (increasing the Congestion Charge from £15 to £18), around 55 per cent thought the proposals would have some effect. One third (33 per cent) considered they would have a moderate or major effect while 22 per cent said it would have a minor effect.

4.6.4 When asked to consider Proposal B (new CVD for EVs), around 57 per cent thought the proposals would have some effect in helping us manage traffic and congestion in central London. Around one third (34 per cent) said it would have a moderate or major effect and almost a quarter (23 per cent) said it would have a minor effect.

4.6.5 For Proposal C (change to Residents' Discount for new applicants), a lower proportion of respondents thought it would have some effect (52 per cent). Almost a third (29 per cent) thought it would have a moderate or major impact and 23 per cent thought it would have a minor impact. Ten per cent said they did not know how effective the proposal would be.

Figure 4-10: Effectiveness of proposals in achieving TfL aims to manage traffic and congestion in central London (per cent)



Base: Proposal A (n=3,285); Proposal B (n=3,164); Proposal C (n=3,157), Question: How effective do you consider this proposed change to the Congestion Charge scheme would be in achieving our aims to manage traffic and congestion in central London?

Impact of proposals on travel in the CCZ

4.6.6 Respondents were asked to consider how the proposals would impact the way they travel in the CCZ (Table 4-3).

4.6.7 Just over half (53 per cent) responded that the proposals 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.

Table 4-3: Impact of proposals on travel within the CCZ?¹⁸

Impact	Count	%
I would travel more within the zone by public transport or active travel	627	19

¹⁸ Please note, the paper-based version of our questionnaire contained a discrepancy to the online version. In the paper version, an additional answer option was offered ('I would reduce my frequency of travel into or within the zone') which was not presented in the online version. Only four people responded by paper and none chose this answer option when responding to this question.

Impact	Count	%
I would travel less within the zone by public transport or active travel	113	4
I would travel more within the zone by EV	106	3
I would travel less within the zone by EV	201	6
I would be unable to travel into or within the zone	481	15
It wouldn't make any difference to the way I travel	1,729	53

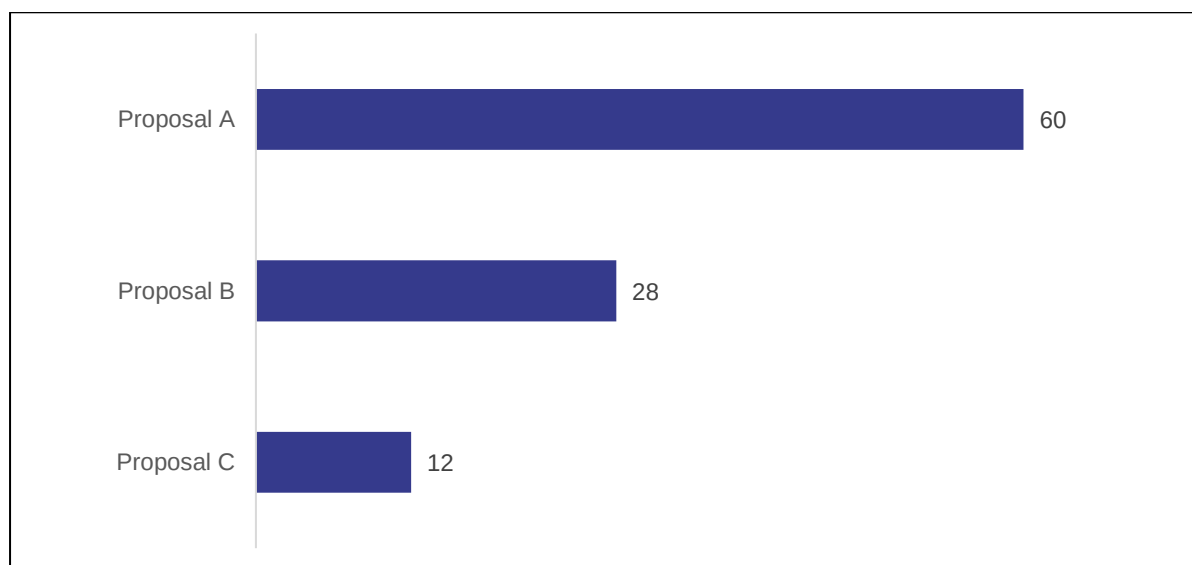
Base: n=3.257, Question: How do you think our proposals would affect the way you travel within the CCZ?

- 4.6.8 Those who were residents in the CCZ were more likely to say that the proposals wouldn't make any difference to the way they travel in the CCZ (62 per cent) than those employed in the CCZ (50 per cent), visitors to the area (49 per cent) and PHV drivers (43 per cent).
- 4.6.9 Those who drive in the CCZ were more likely to say they would be unable to travel into or in the CCZ (20 per cent) than those employed in the CCZ (13 per cent).
- 4.6.10 Those employed in the CCZ were more likely to say that they would travel more in the zone by public transport or active travel (26 per cent) than residents in the CCZ (15 per cent) and those who drive in the CCZ (seven per cent).
- 4.6.11 Those under 25 (80 per cent) and aged between 26-34 (34 per cent) were more likely to state they would travel more by public transport or active travel in the CCZ. Conversely, those aged 56-65 (64 per cent) and 66 and over (66 per cent) were more likely to say the proposals wouldn't make any difference to the way they travel.
- 4.6.12 Those travelling into the CCZ at least 1-3 times per month were more likely to say that they would be unable to travel into or in the CCZ (22 per cent) than those travelling into the CCZ less frequently (11 per cent).

Proposals which would likely reduce or prevent travel into or in the CCZ

- 4.6.13 Those who responded that the proposals would reduce or prevent travel into or in the CCZ, were asked which aspect of the proposed scheme would prevent this (Figure 4-11).
- 4.6.14 Three fifths (60 per cent) responded that Proposal A would likely reduce or prevent travel into or in the CCZ. More than one quarter (28 per cent) responded that Proposal B would impact their travel and 12 per cent indicated that Proposal C would likely reduce or prevent travel into or in the CCZ.

Figure 4-11: Proposals which would likely reduce or prevent travel into or in the CCZ (per cent)

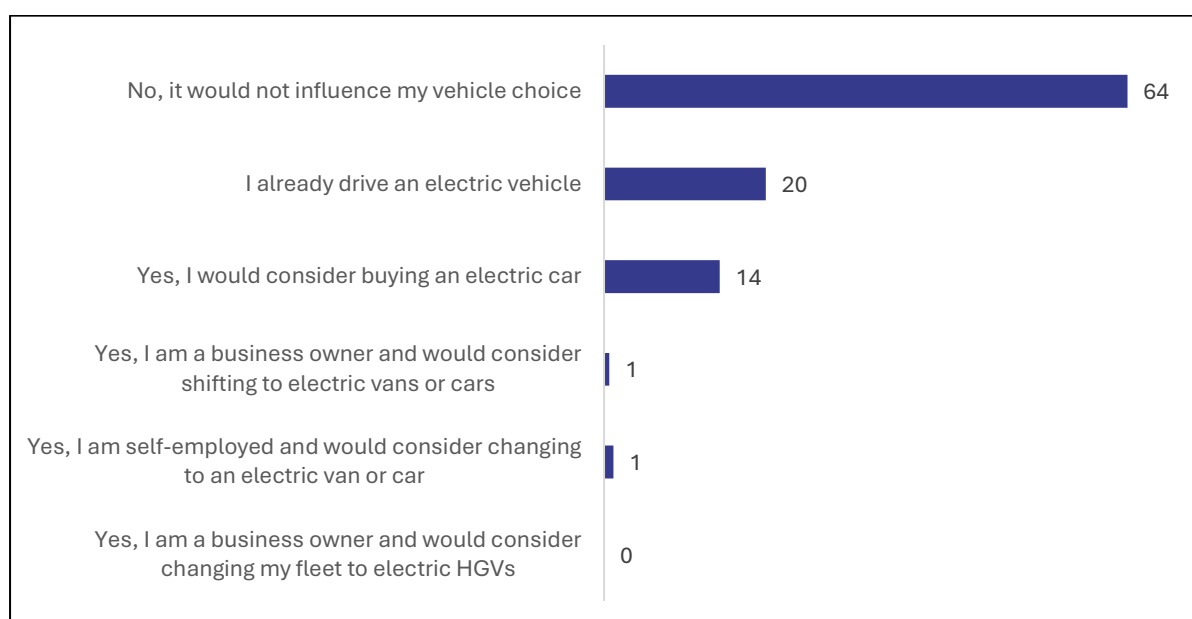


Base: n=1,934, Question: As you've indicated that our proposals would likely reduce or prevent your travel into or within the CCZ, please indicate which element of the scheme would cause this?

Impact of proposals on future vehicle purchase

4.6.15 Those who responded to the consultation were asked whether the proposals would affect their future intentions when purchasing a vehicle. Just under two thirds (64 per cent) said the proposals would not impact their vehicle choice, while one fifth responded that they already drive an EV. Sixteen per cent responded that they would consider buying an electric car or van.

Figure 4-12: Impact of proposals on future vehicle purchase (per cent)



Base: n=3,133, Question: Would our proposals affect your future intentions when purchasing a vehicle?

4.6.16 Those respondents who were residents in the CCZ were more likely to say the impact of proposals would not influence their vehicle choice (70 per cent).

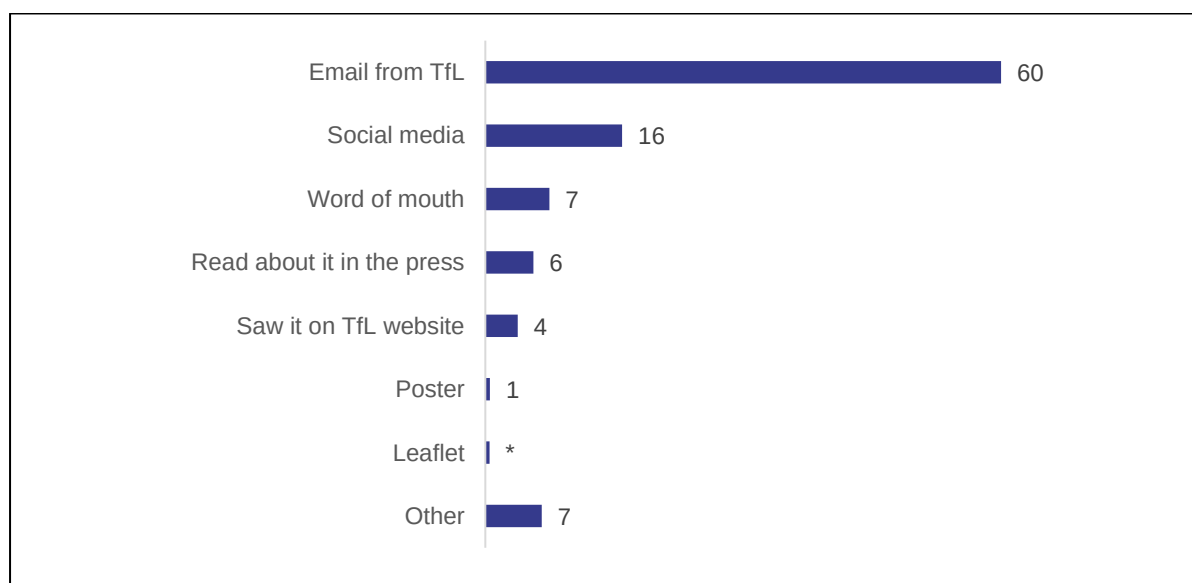
4.6.17 Those respondents who were local business owners (34 per cent), worked (19 per cent) or drove in the CCZ (28 per cent) were more likely to already be driving an EV. Almost a fifth (18 per cent) of residents said they would consider buying an electric car.

4.7 Quality of the consultation

How respondents heard about the consultation

4.7.1 Three fifths of respondents (60 per cent) heard about the consultation through receiving an email from us. A further 16 per cent heard about the consultation on social media and seven per cent were made aware through word of mouth (Figure 4-13Figure 4-13Figure 4-13).

Figure 4-13: How respondents heard about the consultation (per cent)

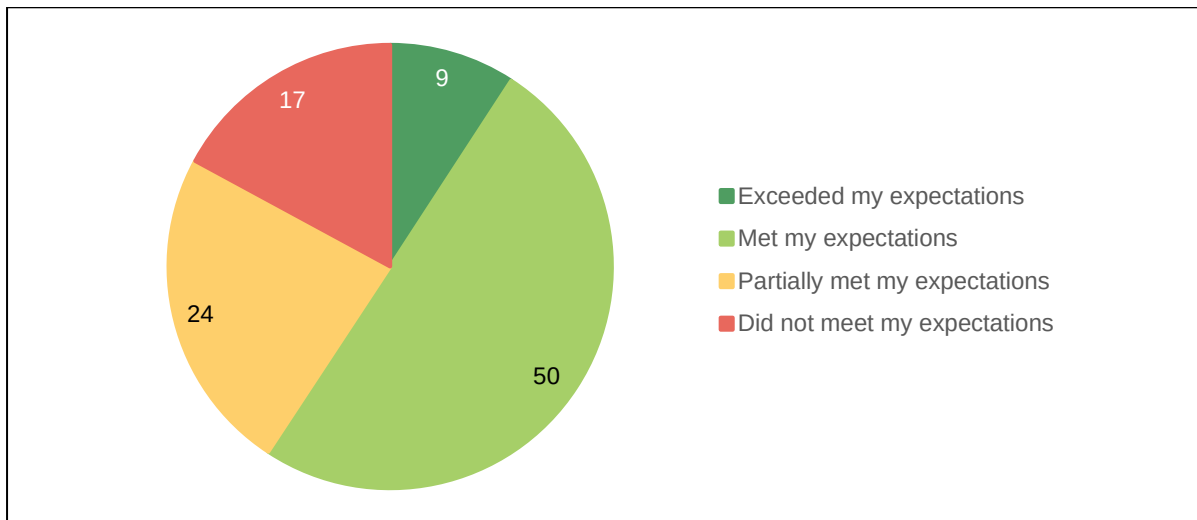


Base: n=3,132, *Responses less than 1 per cent. Question: How did you hear about the consultation? Please select the main way you heard

Experience of participating in the consultation

4.7.2 Participation in the consultation exceeded expectations for nine per cent of respondents, met expectations for half (50 per cent) of respondents and partially met expectations for one quarter (24 per cent) of respondents. Seventeen per cent of respondents felt the consultation did not meet expectations (Figure 4-14Figure 4-14).

Figure 4-14: Experience of participating in the consultation (per cent)



Base: n=3,199, Question: Having just completed this consultation, which of the following statements best reflects your experience of accessing the consultation information and sharing your feedback with us.

5 Responses to issues raised

5.1 Introduction

- 5.1.1 We commissioned independent consultants, AECOM, to analyse responses to the consultation survey including two open questions where respondents were able to write free-text.
- 5.1.2 All free-text responses and letters and emails were grouped into themes to allow meaningful analysis. Letter and email responses were combined with the free-text comments given in the survey for analysis purposes.
- 5.1.3 The first open question (question 16) asked respondents for their comments on the scheme proposals.
- Do you have any comments about the proposals or the proposed changes to the Mayoral Guidance? This could include comments about the impact, positive or negative, that our proposals may have on you. Please highlight if this impact is due to a protected characteristic you may have, or whether the impact may affect others due to their protected characteristic. Please note which proposal your comment is about or if you are commenting on the Mayoral Guidance.
- 5.1.4 The second open question (question 22) asked respondents for their comments on the consultation itself.
- If we didn't meet your expectations, please tell us how you would like us to improve our consultation service in the future. (Please only share your feedback on how we can improve our consultation service here. If you want to leave further feedback on the proposals that we're consulting on, then please return to section (iii) above and leave your feedback there).
- 5.1.5 The following sections set out the issues raised by stakeholders and other respondents to the consultation in response to questions 16 and 22, alongside our response to each of these issues. These open questions were analysed by AECOM together to avoid duplication.
- 5.1.6 Below, the different issues raised have been split according to question and then further split according to theme. Where an existing TfL response is relevant to the issue raised, we have referenced this. Where additional issues have been raised by stakeholders, that are not covered in the tables with

issues raised, these have been summarised at the end of the relevant section, including our response to them.

5.1.7 Sections 5.2 to 5.6 are structured as follows:

- Comments on the scheme proposals (Question 16)
 - 5.2 General comments
 - 5.3 Comments on specific proposals
 - 5.4 Comments on specific impacts
 - 5.5 Comments on alternatives and mitigations
 - 5.6 Other comments related to the Congestion Charging scheme
- Comments on the consultation (Question 22)
 - 5.7 Comments on the consultation process
 - 5.8 Issues which were not related directly or indirectly to the proposals

Comments on the scheme proposals (Question 16)

5.2 General comments

5.2.1 The following section provides a summary of the general comments that were received in relation to the proposals. The codes below were used only when the responses did not specify which aspects of the proposals they supported or opposed. Hence, they are not meant to be a representation of the support or opposition to the specific proposals (go to section 5.3 and 5.4 for more detail on responses to specific proposals).

General comments: Support

5.2.2 Table 5-1 provides a summary of the general comments that we received in support of the proposals.

Table 5-1: Responses to general comments (support)

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
1	Support/agree with the full package of proposals (general comment)	135	5	Support is noted.
3	Support/agree with the Congestion Charge/positive comment about it (general comment)	0	2	Support is noted.
7	Support/agree car/vehicle use needs to be reduced further/discouraged (general comment)	183	16	Support is noted.

General comments: Oppose

5.2.3 Table 5-2 provides a summary of the general comments that we received in opposition to the proposals.

Table 5-2: Responses to general comments (oppose)

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
2	Oppose/disagree with the package of proposals (general comment)	221	1	We have noted these comments and addressed specific issues and/or comments under the appropriate themes elsewhere in Chapter 5.
4	Oppose/disagree with the Congestion Charge/is not necessary/suggest it should be abolished	133	4	The Congestion Charging scheme has been in place since February 2003 and has been effective in managing traffic and congestion in central London. By April 2004, there was a 30 per cent reduction in congestion in the CCZ, and a 15 per cent reduction in circulating traffic.¹⁹ By reducing the overall volumes of traffic in the CCZ and increasing the efficiency of circulating traffic, the Congestion Charging scheme was also responsible for a reduction in localised emissions. This equated to approximately a 12 per cent emissions reduction of both NO_x and PM₁₀ from road traffic and 20 per cent reduction in emission of CO₂ from road traffic, based on a 24-hour annual average day, by April 2004.²⁰ Analysis shows there would have been three million additional journeys (average per day) by car across London in 2019 without the changes TfL has introduced to encourage more sustainable

¹⁹ Congestion Charge Second Impacts Monitoring Report, TfL, 2004 <https://content.tfl.gov.uk/impacts-monitoring-report-2.pdf>

²⁰ Ibid.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				travel patterns over the last couple of decades, of which the Congestion Charge was a critical first step.²¹ The scheme remains an integral part of managing demand for road space in central London and delivering certain aims of the MTS. In line with the MTS Proposal 20, we keep the scheme under review to ensure it remains effective in managing traffic and congestion, proposing changes when necessary. The Congestion Charging scheme was introduced following extensive public and stakeholder consultation and has been modified over the years in order to ensure that it remains effective.
5	Oppose/disagree with the Congestion Charge as it is just another tax/money-making scheme	803	12	The objective of the Congestion Charging scheme is to manage traffic and congestion in central London. Without the scheme, congestion and other adverse impacts of traffic, such as air pollution and increased carbon emissions, would be worse. In line with Proposal 20 of the MTS, the scheme is kept under review and from time-to-time changes are proposed in order to maintain its effectiveness in achieving relevant MTS policies and proposals, notably, the MTS' central aim for sustainable mode share in London and specifically its ambitious targets for central London. Although the scheme seeks to achieve its objectives through the imposition of a charge to disincentivise vehicle use, its purpose is not to raise revenue.

²¹ 'Congestion Charge marks 20 years of keeping London moving sustainably', 17 February 2023. Available on: <https://tfl.gov.uk/info-for/media/press-releases/2023/february/congestion-charge-marks-20-years-of-keeping-london-moving-sustainably#:~:text=In%20addition%20to%20these%20immediate,the%20Congestion%20Charge%20helped%20avoid.>

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				All net revenue from the Congestion Charge must be used to deliver the MTS, which includes improving public transport and making enhancements for people walking and cycling.

General comments: Other

5.2.4 Table 5-3 provides a summary of the general comments that we received in other areas.

Table 5-3: Responses to general comments (other)

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
6	Suggest package of proposals should go further (general comment)	66	0	We are committed to reducing congestion and its economic, environmental and health impacts in London. While the aim of the Congestion Charging scheme is to manage and reduce traffic and congestion in the CCZ, we recognise there are unavoidable vehicle trips in central London, for which accelerating the switch to EVs is critical to delivering a zero-carbon city and improving air quality. The overarching objective of the MTS is that 80 per cent of all journeys in London should be made by walking, cycling or using public transport by 2041. This objective is even higher for trips within central London (95 per cent) and between central London and inner/outer London (99 per cent). The proposals are intended to enable the Congestion Charging

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				scheme to disincentivise the use of non-essential motorised vehicles in the CCZ to meet its primary goal of reducing traffic and congestion to achieve relevant MTS objectives, as well as providing secondary benefits for carbon reduction and air quality by supporting the electrification of the traffic fleet of those who drive in the zone.
8	Concern that the package of proposals will penalise drivers/motorists (general comments)	267	8	The MTS sets objectives for sustainable mode shift (see response 6). To deliver this, investment has been made to improve the environment and reduce road danger for people walking, cycling and using public transport throughout London. This has included changes to the road network within central London. Central London has a tightly constrained road network. A shift from car use to more space efficient modes of travel is the only long-term solution to ensuring London is an efficient well-functioning city where people and goods can reliably get to their destinations. The congestion experienced in this area is a result of high demand for the movement of motorised traffic in the limited geographic space of the CCZ (one per cent of London's geographic area). We therefore need to reduce car trips in favour of increased trips by people walking, cycling and using public transport. To achieve this, we need appropriate and safe networks that provide high quality routes and priority to make them more attractive, realistic and reliable choices for people. People and businesses who have no choice and have to drive in the CCZ, e.g. for delivery and servicing trips, benefit from the

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				reduced traffic which results from the charge. The Congestion Charging scheme enables more reliable journeys for these essential trips, with reduced delay and costs associated with this.

5.3 Comments on specific proposals

5.3.1 This section contains summaries of the comments that were received in relation to the proposals. It is split into four tables with associated stakeholder commentary at the end of each table. The first table contains comments on the Charge level increase, the second on the proposed new CVD, the third on the changes to the Residents' Discount, and the fourth on changes to the Mayoral Guidance. Where a comment was made in respect of the impact, positive or negative, of the proposals, it is reported separately in section 5.4 below.

Charge level increase

5.3.2 Table 5-4 provides a summary of the comments received on the proposed charge level increase.

Table 5-4: Responses to issues raised on the proposed charge level increase (excluding impacts)

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
20	Support/agree with the proposed increase to the charge level (£15 to £18)	114	11	Support is noted.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
21	Suggest charge should be higher than £18/higher in general	183	5	See response 6. We acknowledge there are different views as to the proposed level of the charge and whether it should be lower or higher.
22	Suggest charge should be higher than £15 but less than £18	12	1	The charge level was last changed in 2020 when it increased on a temporary basis from £11.50 to £15 in response to the challenges of the pandemic, and then was permanently maintained in 2022. Previous changes included an increase in 2014 from £10 to £11.50, in 2011 from £8 to £10 and in 2005 from £5 to £8.
23	Oppose/disagree with the proposed increase to the charge level (£15 to £18)	677	18	
24	Suggest charge should be lower/is already expensive (general comments)	138	0	In the period since the last charge level increase, the deterrent effect of the charge has eroded in the context of wider inflation and an increase has been proposed as it is considered necessary to maintain the effectiveness of the scheme. It is also important to ensure that public transport does not become relatively less attractive due to fares increasing by more, or at a greater rate, than the Congestion Charge. We consider the proposed increase is necessary to maintain the effectiveness of the scheme as a disincentive to driving in central London, in the context of wider inflation. While we want to encourage people to use sustainable modes (public transport, cycling and walking) as much as possible, or move private vehicle trips to take place outside charging hours, it is recognised that for some people, especially deliveries and servicing, it is more difficult to shift modes. A higher charge than the £18 proposed was not considered appropriate due to the need to balance the impacts on businesses and individuals. While

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				previous assessments have shown that a higher charge could have a more significant impact on traffic in the CCZ, a charge greater than £18 was seen as having too significant an impact on specific groups. The proposed change seeks to achieve a balance that makes the choice to drive in central London - which is very well-served by public transport – generally less attractive than using public transport, walking or cycling, while still recognising the impact the charge may have on people and the economy. As outlined in Proposal 20 of the MTS, we will keep the Congestion Charging scheme including the charge level under review to ensure its continued effectiveness in meeting MTS objectives.
40	Suggest further increases to the charge level over time/how increases should be calculated	45	2	As noted in the Supplementary Information published during the consultation, from time to time we propose changes to the charge level so that it retains its deterrent effect in the wider context of inflation and the scheme is able to meet its objectives. Charge level increases have typically been made at intervals of between two and six years, following public consultation. It is envisaged that it will continue to be necessary for the charge to be increased in the future. We also consulted on our proposal for changes to the Mayor's Guidance which would enable routine charge level increases to be made within specified parameters without consultation. These parameters are: 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; an annual inflationary rate plus one per cent; or a lower amount.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				Routine increases would still be subject to a decision-making procedure. We would undertake an EqlA each time and this would inform the decisions of TfL and the Mayor as to whether to put forward and proceed with the increase. To have effect, the new charge levels would need to be set out in a variation order and confirmed by the Mayor. Customers would be given appropriate notice of any changes.
41	Concern about further increases to the charge level over time/how increases will be calculated	20	4	As part of this package of proposals, we also consulted on changes to the Mayor's Guidance related to future routine increases to the charge level. Please see our response to 40 above. We will continue to keep the charge under review as per proposal 20 in the MTS and may in future also propose further changes to the charge level (in addition to routine increases, if these are taken forward). It would be premature to comment on these in advance. There would be a public consultation if any such change is proposed.
42	Suggest charge should be lower for business/commercial/freight vehicles	12	2	The Congestion Charge is set at a level to act as a disincentive for all non-essential motorised vehicles to drive in or through the CCZ. This is to enable the Congestion Charging scheme to meet its goal of reducing traffic and congestion and delivering the aims of the MTS. We recognise the important role of commercial vehicles in supporting London's economy and it is acknowledged that many such trips will be much harder to shift to public transport or active modes. While it is recognised that for some trips it is necessary to

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				use a motorised vehicle, it is important not to undermine the aims of the Congestion Charging scheme and incentivise businesses to reduce and re-time trips and switch to other modes where possible. The MTS has a target of reducing freight trips in central London by 10-15 per cent in the AM peak, and it is important to keep managing these traffic levels in the zone. Setting a lower charge for some vehicle types would undermine the objectives of the scheme. Businesses benefit from reduced congestion and more reliable journey times as a consequence of the Congestion Charging scheme. In addition, businesses and commercial fleets using EVs will financially benefit from the new CVD providing discounts for EVs based on vehicle type (50 per cent discount for electric vans, HGVs, light quadricycles and heavy quadricycles and 25 per cent discount for electric cars until 2030 and halved thereafter) which would not be available without the proposals (given the planned end of CVD in December 2025). We acknowledge that businesses may face more challenges in the take-up of electric vans - a larger discount is proposed for those vehicle types which, overall, customers may find more difficult to switch to electric and require further support to make the switch. We have seen increasing uptake of cargo bikes in all areas of London, going from 4,546 counts in central London in 2022 to 9,167 in 2024, representing an increase of 101.6 per cent (change 2022-2024). Cargo (e)-bikes are not in scope of our road user charging powers as set out in the Greater London Authority Act 1999 as they are typically not considered to be motor vehicles.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
43	Suggest charges should be higher for other specified types of vehicles/people We received other comments about higher charges for other specified types of vehicles/people which we have noted. Comments included: - A higher charge for other specified types of vehicles, including diesel and petrol cars, SUVs/large cars including EV SUVs, larger and heavier vehicles including lorries, commercial vehicles, non-commercial vehicles, electric scooters and bikes, black cabs, PHVs, company vehicles and executive cars - A charge of £25 for older, more polluting vehicles	82	0	<u>Our response to 'A higher charge for other specified types of vehicles':</u> There is no proposal to have differential charge levels for different specified types of vehicles at this time. Electric scooters and (electric) bikes are typically not considered to be motor vehicles and are therefore not within scope of our road user charging powers as set out in the Greater London Authority Act 1999. <u>Our response to 'A charge of £25 for older, more polluting vehicles':</u> There is no proposal to have a higher charge for older, more polluting vehicles at this time. The Congestion Charging scheme's objective is managing traffic and congestion, and improvements in air quality are a secondary benefit which arises from lower traffic volumes and induced sustainable mode shift. An older, more polluting vehicle which is used in the CCZ during charging hours will be subject to the ULEZ/LEZ charge in addition to the Congestion Charge meaning their total daily road user charging cost for a non-compliant car or small van would be £30.50 (£12.50 + £18).
44	Suggest charges should be lower for other specified types of vehicles/people We received other comments about lower charges for other	74	5	<u>Our response to 'A lower charge for other specified types of vehicles or groups of people'</u> There is no proposal to have differential charge levels for different specified types of vehicles or groups of people at this time. A number of discounts are available for people meeting specific eligibility criteria, which are broadly targeted at people or services

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	specified types of vehicles/people which we have noted Comments included: - A lower charge for other specified types of vehicles or groups of people, including low emission cars (including hybrid, plug ins), car club vehicles, PHVs, low incomes, vehicles with a retrofitted tyre-dust-collection device - Charge should stay at £15 for EVs - A charge around £10 for occasional drivers (only once a month or less) - Car club vehicles should get a similar discount to residents			who have less choice about whether to drive in the zone or are performing a public service or to incentivise the use of cleaner vehicles to minimise the negative impacts of these trips, such as reducing emissions and improving air quality, for example. The proposed new CVD provides differential discounts for EVs based on vehicle type (50 per cent discount for electric vans, HGVs, light quadricycles and heavy quadricycles and 25 per cent discount for electric cars until 2030 and halved thereafter). <u>Our response to 'Charge should stay at £15 for EVs':</u> There is no proposal to keep the base charge for EVs at £15. The new CVD included as part of the proposals provides discounts for EVs based on vehicle type, which means that all EVs pay less than the base charge of £18 (and less than the current charge level of £15). <u>Our response to 'Charge should be around £10 for occasional drivers':</u> The Congestion Charge is a flat daily charge for driving in the Congestion Charging Zone within charging hours. It is considered that this already provides an incentive to reduce the frequency of driving and no further changes are proposed. <u>Our response to 'Car club vehicle discounts':</u> We recommend a specific new discount for back to base car club EVs based in bays in the CCZ. Please see section 2.5.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
45	Suggest charges should be higher for motorbikes/to not be exempt	9	1	Motorbikes are exempt from the Congestion Charge, and motor tricycles which are one metre or less wide, and two metres or less long, are eligible for a 100 per cent discount. The reason for this is that these vehicles contribute less to congestion than other vehicles such as cars, vans and HGVs. There is no proposal to end either this discount or exemption at this time. However, in line with Proposal 20 of the MTS, we keep existing and planned road user charging schemes, including the Congestion Charge, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy.

Other stakeholder comments – Charge level increase

5.3.3 We have noted these additional comments from stakeholders that are not included in the tables above.

5.3.4 DPD, GMB union and FSB suggested phasing the charge level increase over a period of time (e.g. three years) to help businesses. **Our response:** *We do not propose to introduce the charge level increase to £18 over three years. Our approach to increasing the Congestion Charge to date has been to make changes every few years. The charge was last increased in 2020. However, we are proposing that in future we would be able to make more incremental changes to the charge level without consultation and have consulted on changes to the Mayoral Guidance that would allow for this. This increase in charge level would be 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 (please see section below on changes to the Mayor's Guidance). This would mean lower level, more regular charge increases which would be easier for individuals and businesses to plan for.*

5.3.5 Keith Prince AM and Thomas Turrell AM commented that the charge increase is higher than inflation (£5 in 2003 = £9.16 today). Living Streets stated that it is below inflation so it should be increased further. **Our response:** *The charge was last*

increased to £15 in 2020. An increase to £18 in January 2026 is a below inflation increase for the period since the charge was last changed. However, the level of the Congestion Charge is determined by a number of considerations guided by the need for the charge to act as a deterrent to driving in the zone in order to help achieve the scheme's main objective of traffic and congestion management. There are also 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 CC has not been increased since 2020, and the proposed charge is considered to be the right level to manage traffic within the zone and achieve MTS goals around sustainable mode share, safety and others.

In addition to the charge level increase which is proposed for January 2026, we are also proposing changes to the Mayor's Guidance so that in future it will be possible for us to make routine increases to the scheme including 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. Please see the section on Changes to the Mayoral Guidance below.

- 5.3.6 London TravelWatch have commented on the charge level increase, asking how much revenue it is expected to raise, how it will be used and how freed-up road space will be used. They have requested that the increase is implemented in March in line with public transport fares instead of January which is often a financially difficult time for people. **Our response:** *It is proposed that, if approved by the Mayor, the charge increase to £18 would be implemented on 2 January 2026. This date aligns with the proposed date for the implementation of the first phase of the new CVD and by implementing these on the same date (subject to Mayoral decision) there are advantages in terms of administrative burden to TfL and in enhancing customer understanding with these changes happening simultaneously. This is also considered to be a sufficient notice period for customers, with an announcement on the Mayor's decision expected in November 2025.*

We also consulted on future inflation-linked increases to the charge, which subject to a Mayoral decision on changes to the statutory guidance, would not be subject to public consultation (although these would not be automatic every year as they would be subject to an EqlA and procedural requirements set out in the Greater London Authority Act 1999 and the Mayoral Guidance). The expected date for implementation of future routine charge increases, subject to a decision on changes to the Mayoral Guidance, was not specified in the consultation materials. Part of the rationale for this proposal was to align future routine charge increases with annual increases to Tube and TfL railway passenger fares, which are usually implemented in

March every year, with an announcement in the preceding December. We would anticipate following a similar timetable but it is not specified as part of this consultation. We are required to give sufficient notice to customers of any changes.

We publish a four-year programme for revenue use and Congestion Charge revenue is also set out in our Annual Report and Accounts.

Proposed New Cleaner Vehicle Discount (CVD)

5.3.7 Table 5-5 provides a summary of the comments received on the proposed new CVD.

Table 5-5: Responses to issues raised on the proposed new CVD (excluding impacts)

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
100	Support/agree with new proposed CVD/providing a discount lower than 100 per cent for EVs (general comment)	82	8	Support is noted.
101	Oppose/disagree with new proposed CVD/providing a discount lower than 100 per cent for EVs (general comment)	227	13	The primary objective of the Congestion Charging scheme is to manage traffic and congestion in central London. Discounts and exemptions must be carefully balanced against this objective. The consultation materials stated that continuing with a 100 per cent CVD was not compatible with the Congestion

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
102	Suggest extending the 100 per cent discount for all EVs	205	10	Charging scheme's objectives based on the current number of EVs seen in the CCZ, with historical trends indicating that they would continue to increase. The growing number of EVs in the CCZ means that reintroducing a 100 per cent discount would undermine the deterrent effect of the scheme, encouraging more vehicle entries and contributing to worsening traffic. A scenario with a 100 per cent CVD was, therefore, ruled out as a reasonable alternative and was not fully assessed. See paragraph 5.3.9 for more details.
103	Suggest a higher discount for electric vans, HGVs, quadricycles (i.e. higher than 50 per cent)	19	14	The new proposed CVD balances managing overall traffic and congestion in the CCZ and supporting the electrification of the fleet in support of MTS objectives. Vans account for around nine per cent of all CVD registrations currently (the remainder are cars and PHVs). The MTS aims to reduce car dependency and free up space in central London for essential freight trips and more reliable bus journeys, as well as for walking and cycling. Vans and HGVs constitute the majority of freight trips and it is acknowledged that many such trips will be much harder to shift to public transport or more space efficient alternatives (cargo bikes).
104	Suggest a lower discount for electric vans, HGVs, quadricycles (i.e. lower than 50 per cent)	9	0	The new CVD proposes that vans and HGVs will receive a higher percentage discount (50 per cent until 2030, halved thereafter) than cars, given the higher challenges they face in the road to decarbonisation. The discount levels offered in the proposed new CVD seek to balance the need for mode-shift and managing traffic, while supporting the electrification of those vehicles that cannot shift to sustainable alternatives. We

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				are keen to support London's businesses in their transition to EVs and the proposed new CVD is part of a package of support (see section 3 in Supplementary Information). As outlined in Proposal 20 of the MTS, we will keep existing and planned road user charging schemes, including the Congestion Charge, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy.
105	Suggest no discount for electric vans, HGVs, quadricycles	58	0	See response 103 and 104. Varying the level of discount by vehicle type enables us to provide greater support for vehicles where the transition towards EVs has been slower and there are other potential benefits, such as furthering progress towards MTS objectives. Maintaining a discount at some level for all EVs also provides ongoing support and incentives for those driving in the zone to do so in an EV.
106	Suggest a higher discount for electric cars (i.e. higher than 25 per cent)	106	6	Cars are the most numerous vehicles in the CCZ and account for the majority (91 per cent) of vehicles registered for the CVD. We are now seeing an average of 7,871 unique car EVs in the zone during weekday charging hours, and the proportion of EVs inside the CCZ has increased with time. Comparing an average day in September 2022 to an average

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
107	Suggest a lower discount for electric cars (i.e. lower than 25 per cent)	15	0	day in September 2024, 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. A higher discount for electric cars will therefore lead to higher levels of traffic in the CCZ. The transition to electric cars – which the CVD has supported – has already been successful and, compared to vans and HGVs, there is a wider and more affordable range of options.
108	Suggest no discount for electric cars (e.g. they still contribute to congestion/traffic levels so shouldn't be discounted)	245	4	The new proposed CVD aims to achieve a balance between managing overall traffic and congestion in the CCZ and supporting the electrification of the fleet in support of MTS objectives. It is proposed to halve this discount from March 2030 as eligible vehicle numbers continue to increase, particularly in the context of the Government's ZEV mandate.
109	Suggest CVD should be higher for electric car clubs/car-sharing	136	19	As set out in MTS Proposal 19, we recognise the potential contribution of car clubs to help Londoners give up their privately owned cars, when they are paired with a reduction in the availability of private parking. However, like other vehicles, car club vehicles contribute to traffic and congestion and as such it is considered appropriate that they are subject to the Congestion Charge. Their transition to EVs has already been successful compared to other vehicle types (see response 106), and a higher discount may also disincentivise people from using more sustainable modes. Under the current proposals, there would remain an incentive for car clubs to

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				make EVs available for use in the CCZ, in the form of a new CVD from January 2026. While a 100 per cent discount for all EV car club vehicles or a new car club discount for all car club vehicles (including non-EV) is not considered to be in line with the MTS and scheme objectives, we have considered this issue further and are now recommending a specific new 100 per cent discount for back to base car club EVs based in bays in the CCZ (as described in section 2.5 above). This is recommended as a mitigation to the proposed changes to the Residents' Discount for existing and future residents, particularly those on low incomes who may require a vehicle to travel and for whom it may be harder to access EVs, without which they would have to pay the full user charge for travel in the CCZ during charging hours. If approved, this discount will also act as an incentive for residents not to purchase a vehicle in advance of the Resident's Discount changes coming into place. It may also facilitate the use of car club EVs by residents as an alternative to privately owned EVs or as an alternative to the use of non-EVs.
110	Suggest CVD should be higher for electric PHVs	62	13	See response 106. Among PHVs, the transition to EVs and Zero Emission Capable (ZEC) vehicles is already well-progressed, in part due to licensing requirements and supported by the CVD. PHV licensing requirements require that vehicles new to licensing must be at least ZEC. In February 2025, just over a quarter of the PHV fleet was electric. This is evident in the

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				high proportion of PHVs observed in the CCZ: 32 per cent of all PHVs observed in the CCZ were electric in September 2024, an increase from 23 per cent in September 2022. The proportion of EVs in new PHV registrations is also increasing, with 71 per cent of new registrations in January 2025 being electric. In addition, some PHV operators allow drivers to pass on the costs of the Congestion Charge to customers by applying a surcharge for trips which start, end or pass through the CCZ (including outside charging hours), limiting the financial impact of the charge on PHV drivers operating under this business model. We recently published our second Taxi and Private Hire action plan, which among other actions sets out how the taxi trade and private hire industry can continue to reduce their environmental impact and how we will support them in this. It also acknowledges the impact of the changes they have already made over the past 13 years. In addition, while the current licensing requirement for new taxi and PHV registrations is that vehicles must be at least ZEC, we will consult with the taxi trade and private hire industry in 2025/2026 on a proposal to introduce a zero emissions (at the tailpipe) licensing requirement for taxi and PHVs in the future. While PHVs may help to provide alternatives to cars for certain trips, particularly for those who do not own a car, they nevertheless continue to contribute to congestion (hence the

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				removal of their exemption from the Congestion Charge in 2018); and a higher discount may also disincentivise people to use more sustainable modes.
111	Suggest CVD should be higher for electric business/commercial/freight vehicles	15	20	See responses 103 and 104.
112	Suggest CVD should be higher for EVs of small businesses/sole traders/tradespeople	9	16	See responses 103 and 104.
113	Concern that the new CVD will reduce the number of people upgrading to EVs	258	52	As mentioned in section 8.3.1.2 of the IIA, it is recognised that the new CVD is lower than the 100 per cent discount provided by the current CVD (ending in December 2025). However, the new CVD offers a greater incentive than was originally planned for, given the CVD is due to end in December 2025 and EVs were to be subject to the full rate of the Congestion Charge from 2026 onwards (no discount for EVs). The new CVD means savings for EVs as compared to Internal Combustion Engine (ICE) vehicles being driven in the zone. Additionally, while this discount is provided in the context of a charge level increase aiming to ensure the scheme remains effective, the final charge for EVs given the new proposed CVD and charge level increase would be lower than what it would be without the proposals (£15). Our analysis estimates the impact on numbers of vehicles (EV and non-EV) driving in the CCZ. This does not represent the rate of electrification for London and the assessment was not attempting to estimate the impact of all factors on long term vehicle purchasing decisions. This is primarily because the

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				current 100 per cent CVD will have been only one of many factors influencing the growth in EVs, which has been influenced by a combination of policies. See paragraph 5.3.18 for more detail on these policies.
114	Concern that the new CVD will have a negative financial impact on those who do not have off-street parking/are facing parking charge increases	74	2	See response 149 for more details on the expected cost savings from EVs compared to diesel alternatives, and the constantly expanding EV public charge point network. We will continue to call on the Government to make public charging more affordable by reducing the 20 per cent VAT rate on public charging to be the same as domestic charging.
115	Concern about the impact of the new proposed CVD on those who upgraded/invested in EVs (e.g. those who upgraded to receive the 100 per cent discount)	274	27	The cessation of the CVD on 25 December 2025 was announced in 2018 when the CVD was first introduced, following a public consultation and Mayoral decision. This means that those making the decision to purchase an EV have had seven years' notice that the discount was time limited and would no longer be offered in 2026. The proposed new CVD means savings for EV drivers compared to a scenario without the proposals. The proposals also mean savings for EV drivers compared to ICE vehicles driving in the zone.
116	Other comment/suggestion about the CVD We received other comments about the CVD which we have noted. Comments included:	129	30	<u>Our response to 'Impacts on those that cannot afford EVs':</u> Please refer to response 149. In addition, central London is very well-served in terms of options for public transport, walking and cycling, both within the CCZ but also from Greater London, meaning that for many trips there are excellent alternatives to private car use. As highlighted in the IIA (4.2.1.3) public transport is the most

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	- Impacts on those that cannot afford EVs - Discounts should apply to hydrogen/hybrid vehicles/other low emission - Business vehicles and private cars should receive the same discount - Too soon to end 100 per cent discount - wait for higher percentage of electrification/should be given more time - No charge for EVs on weekends - Higher discount to electric motorbikes - Comments on the phased approach to discounts (including different percentages and years, and adopting gradual approach) - No discount for delivery drivers/Discount for HGVs and vans should be fully removed by 2030 - Turn discount into an annual fee - Reassess discounts to the CC every year given vehicle numbers in the zone - Offer other support to EVs including free interest finance and larger discounts			common mode of travel to work for Londoners who live or work in the CCZ, and only three per cent of leisure trips made by Londoners with a destination in the CCZ are made by private transport. We understand that residents have a reduced ability to avoid the charge if they drove in the zone, which is why we are also proposing mitigations to support residents of the CCZ on a low income or with a reduced ability to own or access an EV as described in section 2.5. <u>Our response to 'Discounts should apply to hydrogen/hybrid vehicles/other low emission':</u> The new CVD would be available for hydrogen-powered vehicles as is the existing CVD. Previous iterations of the green discount have used other criteria but since 2018 it has been available only to battery electric or hydrogen fuel cell vehicles. This is considered appropriate given the development of vehicle technology and availability in recent years. <u>Our response to 'PHVs to be considered commercial vehicles':</u> The proposed differential discount levels for the new CVD are not based on the purpose for which the EV will be used or the status of the owner but rather on the need to support the shift to the particular EV type. Van and HGV operators and owners face more challenges in the take-up of EVs compared to cars

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	- All EVs should be charged the same, regardless of vehicle type			including PHVs, such as the relatively higher costs of vehicle purchase and more limited range of models available, which is why the new CVD proposes a higher percentage of discount for them. The market for electric cars, on the other hand, is more developed, with competitive purchasing costs for EVs relative to Internal Combustion Engine (ICE) options. The transition to electric cars including those being used as PHVs – which the CVD has supported – has already been successful. PHV licensing requirements are a key measure for influencing PHV vehicle choice, and require that vehicles new to licensing must be at least ZEC. Please also refer to our response to stakeholder comments in the text following this table, paragraph 5.3.25. 5.3.25 <u>Our response to ‘Business vehicles and private cars should receive the same discount’:</u> Varying the level of discount by vehicle type enables us to provide greater support for vehicles where the transition towards EVs has been slower and there are other potential benefits, such as furthering progress towards MTS objectives. Maintaining a discount at some level for all EVs also provides ongoing support and incentives for those driving in the zone to do so in an EV. A higher discount for electric cars would lead to higher levels of traffic in the CCZ. The transition to electric cars – which the CVD has supported – has already been successful and, compared to vans and HGVs, there is a wider and more affordable range of options.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				<u>Our response to 'Too soon to end 100 per cent discount - wait for higher per cent electrification/should be given more time':</u> The decision to end the 100 per cent discount was taken by the Mayor in 2018. As a consequence of that decision, EVs were due to pay the full Congestion Charge from 2 Jan 2026. Reintroducing a 100 per cent CVD was not considered compatible with the Congestion Charging scheme's objectives based on the current number of EVs seen in the CCZ, with historical trends indicating that they would continue to increase, risking undermining the deterrent effect of the scheme and contributing to worsening traffic. We are now proposing a new CVD which offers continuing long-term targeted support for people and businesses switching to EVs, helping to reduce carbon and improve air quality. This new CVD effectively gives more time to drivers to benefit from a discount, albeit at a lower rate. <u>Our response to 'No charge for EVs on weekends':</u> EVs contribute to congestion in the same way as other vehicles. On an average hour of the weekend during charging hours in July 2024, there are 11 per cent more vehicles per hour driving in the CCZ than on an average hour during the weekday during charging hours, in the same month. No charge for EVs at the weekend would undermine the objectives of the Congestion Charging scheme. <u>Our response to 'Higher discount to electric motorbikes':</u>

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				Motorcycles are exempt from the Congestion Charge. <u>Our response to 'Comments on the phased approach to discounts':</u> The new proposed CVD offers higher discounts for those vehicle types which, overall, customers may find more difficult to switch to electric and require further support to make the switch. The proposals include two phases of changes, reducing the discounts by 50 per cent in 2030, as the eligible vehicle numbers (EVs) are expected to increase over time. <u>Our response to 'No discount for delivery drivers/ Discount for HGVs and vans should be fully removed by 2030':</u> See response 105. <u>Our response to 'Turn discount into an annual fee':</u> The aim of the Congestion Charge is to provide a deterrent to driving and for each trip during charging hours, a driver must decide whether or not to pay the charge or to switch to a time out of charging hours, use another mode (e.g. public transport) or not make the trip. An annual fee would undermine this effect and would not relate to the number of days travelled during charging hours. <u>Our response to 'Reassess discounts to the CC every year given vehicle numbers in the zone':</u>

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				Proposal 20 of the MTS states that the Mayor, through TfL, will keep existing and planned road user charging schemes, including the Congestion Charge, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy. <u>Our response to 'Offer other support to EVs including free interest finance and larger discounts':</u> It is not our role to finance vehicle purchase. For the discount level, please see responses 103 and 106. <u>Our response to 'All EVs should be charged the same, regardless of vehicle type':</u> The current 100 per cent CVD will end on 25 December 2025. We are proposing it will be replaced with a new CVD to offer long-term targeted support for people and businesses switching to EVs, helping to reduce carbon and improve air quality. The level of discount would differ by type of EV so that a bigger discount is available for those vehicle types which, overall, customers may find more difficult to switch to electric and require further support to make the switch and help achieve the MTS objectives. Van and HGV operators and owners face more challenges in the take-up of EVs compared to cars including PHVs, such as the relatively higher costs of vehicle purchase, which is why the new CVD proposes a higher percentage of discount for them. The market for electric cars is more developed, with

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				competitive purchasing costs for EVs relative to ICE vehicle options, while for vans and especially for HGVs, the range of models available is much more limited and less affordable.
117	Eligibility for CVD should be based on vehicle size, weight, emissions etc. We received comments about how the eligibility for the CVD should be defined, including: - Exemption for small cars - Not applying the CVD to SUVs - Not applying the CVD to SUVs and having a tiered discount	5	0	The new proposed CVD, like the existing CVD, is linked to vehicle emissions and does not distinguish between different sizes of vehicles. However we are proposing to vary discount levels for different vehicle types whereby L6/L7 quadricycles, which are effectively very small cars, would get a higher discount than cars (50 and 25 per cent respectively until 2030, halved thereafter).
130	Oppose/disagree with CVD only applying to those registered with Auto Pay	5	3	We are proposing that the new CVD is only available to customers registered for Auto Pay (or Fleet Auto Pay). Auto Pay has benefits for the customer including no risk of incurring a PCN for non-payment of the Congestion Charge or other road user charging schemes in London. Customers can also access off-peak charges for the Silvertown and Blackwall tunnels user charges. There is no fee to set up an Auto Pay account and the discounted levels would be automatically applied if the vehicle associated with the Auto Pay account qualifies for the new CVD (subject to the DVLA vehicle record being correct). For TfL, Auto Pay reduces administrative costs and is a more effective payment system. It also means that

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				there is no need for customers to separately register for the CVD, as has been the case so far. More than 80 per cent of all Congestion Charge payments are currently made via Auto Pay, suggesting that it is an attractive option for many. If a vehicle is already on active Auto Pay service, the customer does not need to register again for Auto Pay to qualify for the new CVD discount. See 5.3.21 for more details.
131	Other comment/suggestion about Auto Pay We received comments about Auto Pay, including: - Disproportionate for people who rarely drive in the CCZ - Auto Pay could be used to base the charge on a car's value	10	5	There are no proposals to make further changes to Auto Pay, which is a very popular way to pay road user charges in London. <u>Our response to 'Disproportionate for people who rarely drive in the CCZ':</u> See response 130. Customers who do not wish to use Auto Pay can continue to use other methods to pay the Congestion Charge but would not be able to benefit from the new CVD. <u>Our response to 'Auto Pay could be used to base the charge on a car's value':</u> This is not considered appropriate and is not proposed. All vehicles contribute to congestion regardless of their value.

Other stakeholder comments – proposed new CVD

5.3.8 We have noted these additional comments from stakeholders that are not included in the tables above.

5.3.9 Uber raised concerns that they believe gaps in the impact analysis published alongside the consultation and later (on 18 July) materially challenge the consultation framing and data, and have prevented respondents from being able to consider the full impacts of the proposed changes. GMB also expressed concern about flawed assumptions in the modelling. As a consequence of these gaps, they have requested that we conduct additional analysis of the proposals. Uber has also asked that we run a refreshed consultation on the basis of that updated analysis, including the use of a different baseline (100 per cent CVD), asking that the 100 per cent CVD is extended in the meantime. As part of their response, Uber included data produced by a consultancy firm based on the assumptions put forward in their response (including substitution effects and drivers switching back to non-EVs). We have addressed our response to those assumptions below.

(a) TfL's analysis focuses narrowly on traffic impacts and not congestion or wider environmental impacts.

Our response:

There are different measures of congestion which depend on the data and estimation method used. Some of these are provided for context in the consultation material such as in section 6.2.2.4 of the IIA. In this consultation, as in previous Congestion Charge consultations, we have estimated the impact on traffic in terms of the change in the number of unique vehicles in the CCZ. This analysis formed part of our assessment of the proposals and is considered to be appropriate both to inform our policy development and public consultation. More detailed and complex analysis would be disproportionate and not lead to more meaningful consultation responses. All other things being equal, an increase in the number of vehicles would be expected to lead to increased delay and congestion.

London-wide strategic models can be used to estimate demand, routing, journey times, queue lengths and delay statistics. However, to use them to assess the impacts of the proposals in central London would require significant modifications to our modelling suite. The models would need to be segmented into additional vehicle classes and further calibration would be required.

As was stated in the additional information published on the consultation portal on 18 July 2025, generating additional data and a programme of bespoke strategic model runs to estimate congestion and wider environmental impacts arising from 0.2 per cent of vehicles driven in Greater London is disproportionate to the level of information required to submit an informed consultation response on the impact of the proposals. In an area with limited road space, like the CCZ, higher numbers of vehicles will lead to increased delay and congestion, all other things being equal.

Our proposals include a new CVD for EVs which demonstrates that our analysis considered wider impacts and objectives and was not focused solely on traffic impacts. The new CVD has been proposed at a level which would support wider MTS outcomes without undermining the primary traffic reduction objective of the Congestion Charge. An alternative, more traffic focussed approach, could have been for the existing CVD to end as planned on 25 December 2025 and for EVs to be liable for the Congestion Charge in full or for a new CVD to have been proposed at a lower discount level. Our proposals include differential charge levels for EVs, phased over time which balance the need to meet the primary objective of the scheme i.e. to manage traffic and congestion, with a new incentive for people who need to drive in the zone to do so in a cleaner vehicle at a reduced cost, taking into account the ability of those vehicles or journey types to change mode.

b) Substitution between EVs and non-EVs and competition for road space are not considered. As a result: i) forecasts ignore large, likely changes; and ii) traffic impacts and their consequences will be overestimated.

i. Forecasts ignore large, likely changes

Our response: *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 to reduce traffic and congestion. Our analysis therefore focused on the impact of the total volume of vehicles (EV and non-EV) driving in the CCZ. We assessed the net effect of the proposals on the volume of vehicles seen in the CCZ during charging hours, including for those with different vehicle types and discounts.*

The modelling of the direct impact of the Congestion Charge on vehicles driving in the zone does not include a further modelling exercise or assumption based on the overall rate of the electrification of the vehicle fleet in London, which includes many factors not directly related to the Congestion Charge (including for example cost of vehicles, available grants, availability of charging infrastructure, the cost of EV charging, the cost of parking, the cost of other fuel types, environmental concerns, organisational policies and incentives etc). The CVD will be only one of many factors influencing growth in EV ownership. It is also the case that under our current proposals, it will continue to be cheaper to drive an EV in the CCZ than a non-EV, unless you qualify for another discount or exemption (see paragraphs 5.3.15 and 5.3.225.3.25 for more detail evidencing the successful transition of PHVs to EVs).

The assertion that we have not considered substitution effects focuses on the additional data on vehicle numbers that was published on 18 July 2025 during the consultation. That data demonstrates how the number of vehicles in the CCZ is expected to change in response to a change in the discount level for EVs. In both the 'Proposed Changes' and '100 per cent CVD continues' scenarios, vehicles which are unaffected by discount levels are not expected to respond to changes to that

discount. While it is true that over time EVs will grow as a proportion of the vehicle fleet and non-EVs will reduce, this analysis seeks to demonstrate the impact on the number of average daily vehicles due directly to the proposals. This analysis is not assessing individual drivers/vehicles and their propensity to switch reflecting a number of different factors; it is the overall quantum of different vehicle types expected to be seen on an average day in response to varying discount levels for EVs.

As set out in the additional data published on 18 July 2025, generating further data and a programme of bespoke strategic model runs is disproportionate to the level of information required to submit an informed consultation response on the impacts of the proposals. Running strategic models to understand substitution effects is not proportionate given the scale of vehicles affected by the new CVD, and hence, the scale of the effect of competition for road space.

It is also said that we have not accounted for the impact of PHV drivers “considering” switching back to a diesel or petrol vehicle. PHV licensing requirements require that all newly licensed PHVs must be at least ZEC. Further, there are other incentives and comparisons of the running costs of EVs which mean that driving an EV will continue to be attractive to PHV drivers and others.

Compared to the ‘Do Nothing’ scenario, the proposed new CVD provides an incentive for those who drive in the CCZ to do so in an EV. Even when considering impacts against the current 100 per cent CVD, the proposed new CVD means EVs pay less to drive in the CCZ than a non-EV. A cost incentive for driving an EV in the CCZ versus a non-EV remains, albeit at a reduced level. It is, therefore, not considered that switching from an EV to a non-EV is likely to be attractive for most drivers.

ii. Estimated traffic impacts and their consequences will be overestimated

Our response: *Limited road space does not inherently constrain congestion, as rising demand for car travel can exceed capacity, resulting in slower speeds and longer queues rather than deterring further traffic growth. The assertion about natural limits to traffic increases is not evidenced in Annex A. In contrast, our monitoring of the Congestion Charge has shown that vehicles respond to the Congestion Charge and traffic is reduced as a result. For example, where vehicles such as PHVs have had a 100 per cent discount as was the case until 2019, we saw unconstrained growth in those vehicle types.*

The assumption that only drivers of non-EVs would be deterred by increasing traffic and avoid the CCZ, resulting in the ‘natural limit’ of traffic is not supported by evidence. Non-EVs already place a high value on being in the CCZ during charging hours such that it is worth paying the charge, indicating they could not easily re-route, re-mode or re-time their journeys. By comparison, increasing numbers of EVs driving through the CCZ during charging hours because there is no Congestion

Charge deterrent may mean they are more likely to disperse to other routes or times of day than non-EVs. It, therefore, does not follow that increased traffic due to a 100 per cent CVD would result in non-EVs avoiding the zone; it is more likely that reintroducing a 100 per cent discount for EVs would lead to increased traffic and delay. This would not support MTS objectives around supporting essential traffic, an attractive public transport network, mode shift or Vision Zero.

In Annex A to Uber's consultation response, the figure 'Changes in central area PHV fleet within 12 months of CVD change' is said to demonstrate a switch from non-EV PHVs to EV PHVs in central London as a result of the current 100 per cent CVD. However, the figure does not show vehicle numbers or the impact of a single policy. The figure shows vehicle km fuel proportions, which includes a range of factors including how frequently different types of vehicles are driven. It also covers a period during which the ULEZ expanded to inner London, the ULEZ scrappage scheme was in operation and PHV licensing requirements were incentivising changes to the PHV fleet, all of which were measures which had the potential to influence the switch from non-EV PHVs to EV PHVs.

Undertaking specific modelling of the competition between vehicles to use limited road space requires detailed strategic modelling. As set out in the additional data published on 18 July 2025, generating additional data and a programme of bespoke strategic model runs is disproportionate to the level of information required to submit an informed consultation response on the impacts of the proposals.

c) Impacts outside central London are not assessed

Our response: *Impact assessments typically focus on the geographical area impacted by the proposals (which in this case is the CCZ, which covers around one per cent of the Greater London area). We do not consider that it would be informative to undertake full London-wide modelling of the consultation proposals. To do so would mean presenting a lot of information which has the potential to confuse, introduce complexity and detract from information which is needed to understand the consultation proposals themselves and their more specific impacts. It is not disputed that EV PHVs (or vehicles in general) will likely drive the majority of the time outside the CCZ. It can be true both that the majority of emissions benefits of vehicles benefitting from a CVD are felt outside central London and that the impact is negligible in those areas due to the very small proportion of vehicles they represent in the vehicle fleet in that larger area. The number of vehicles which are EVs as a direct result of a CVD is even smaller given that the majority of vehicles seen in the CCZ are there infrequently, and therefore the charge is unlikely to be a significant factor in the wider decision or cost comparison when deciding whether to purchase an EV. Purchasing decisions for vehicles which more frequently operate in central London may be more directly influenced by a CVD, but this is a minority of EVs seen in the CCZ, leading to the conclusion that the impact of the CVD on air quality at a*

London-wide level is likely to be negligible. Providing London-wide figures is, therefore, considered to be disproportionate to the level of information required to submit an informed consultation response on the impact of the proposed changes to the Congestion Charging scheme, which operates in the central one per cent of London (21 square kms of more than 1500 square kms). As we explained in the [additional information](#) published on 18 July, to give a sense of scale, the request to undertake London-wide modelling would have entailed generating additional data and a programme of bespoke strategic model runs for impacts arising from 0.2 per cent of vehicles driven in Greater London.

d) New numbers materially challenge the consultation framing and data:

- i. The combined impact of the proposed changes is a 4,239 EV decrease in 2026 relative to the current regime - effectively removing nearly three-quarters of expected EV growth.
- ii. Under the proposed approach, between 2026 and 2035, there are consistently 16-20 per cent fewer EVs in central London than would be the case under the existing regime.
- iii. The 2026 impacts on PHV drivers were similarly understated.
- iv. The consequences of this new modelling, including differences between these scenarios in terms of air quality, have not been disclosed.

Our response: *The assertions made in respect of the information provided on 18 July assume that changes in numbers of EVs seen in the CCZ equate to the growth in numbers of EVs registered or driving in Greater London. This is not what the data shows. The data shows only the number of EVs which enter the CCZ. Vehicles deterred from entering the CCZ during charging hours could be re-routed, re-timed or switched to a different mode for those particular trips in order to avoid the charge. It does not necessarily follow that changes in proportions of vehicle types in the CCZ reflect changes in the Greater London fleet. For example, when the PHV exemption from the Congestion Charge was withdrawn in 2019, we observed a reduction in PHVs entering the CCZ, but not a reduction in overall numbers of PHVs in London. Furthermore, there is no MTS or TfL policy which supports increasing vehicle numbers in London (or in the CCZ); the MTS sets out a need to reduce vehicle numbers in central London, and growing numbers of vehicles, even EVs, would not help achieve this. Our proposals seek to balance the need to manage traffic in central London with our policy to encourage those who are driving, rather than walking, cycling or taking public transport, to do so in the cleanest possible vehicle. A wide range of other policies such as the ULEZ scrappage scheme with higher grant payments for EVs, investment in EV infrastructure and regulation also helped support a shift to EVs.*

(e) Request for additional analysis of the proposals and a refreshed consultation on the proposed changes to be undertaken

Our response: As mentioned in the preceding paragraphs, the changes to modelling being suggested were not necessary to understand the impact of the proposals compared to a 'Do nothing' scenario, and would not be appropriate to include in an analysis exercise to demonstrate the impacts attributable to the new proposed CVD or the other parts of the proposals. We do not consider this additional information was necessary to understand the consultation proposals and submit an informed consultation response. Nor do we consider that it was necessary to assess air quality impacts for the whole of Greater London for the reasons set out above. As a consequence, we do not consider that further consultation on the proposals is required.

- 5.3.10 Uber stated that sections 6-8 of the IIA do not provide a comparison to present day conditions. **Our response:** The assessment as set out in the IIA is appropriate and proportionate to the proposals and gives a clear sense of the expected benefits and disbenefits of the proposals relative to the 'Do Nothing' scenario' including traffic, emissions and air quality impacts. To understand the effect of the proposals, we have assessed the impacts of implementing them versus not implementing them. Hence, the proposals are assessed against what would happen if no proposals were implemented ('Do Nothing'), not against a hypothetical scenario with a 100 per cent CVD after 2025 alongside our other proposals. Comparing against the situation today would not represent the actual effect of the proposals, as the methodology would not account for a major known change to the scheme rules that has been in place for some time (the end of the CVD on 25 December 2025).
- 5.3.11 Uber stated that there is a need to present a full picture of the disproportionate impact that the 'Do Nothing' scenario will have on PHV drivers from Black, Asian and minority ethnic backgrounds and of Muslim faith in light of the Mayor's ongoing public sector equality duty, regardless of the decision having been made in 2018 to withdraw the 100 per cent CVD. **Our response:** As explained previously, the 'Do nothing' scenario refers to the Congestion Charging scheme in the form it would exist from the first charging day of 2026 without any intervention. Effectively, it means that the charge level remains at £15 and the 100 per cent CVD comes to its planned end in December 2025. The proposals we consulted on would change this 'Do Nothing' scenario with the proposed introduction of a new CVD providing support for EV drivers for longer (as well as our other proposals). We have not undertaken a full impact assessment of the 'Do Nothing' scenario. The 2018 decision was fully supported by impact assessments (which recognised the potential negative financial impacts of ending the 100 per cent CVD) and the planned implementation of that decision in January 2026 forms our baseline. However, we are now proposing a new set of circumstances will take effect in January 2026 and have undertaken a full assessment of the impacts of our new proposals. The impact of moving from a 100 per cent CVD to no CVD (the 'Do Nothing' scenario) would serve no purpose in

this consultation as it does not reflect our proposals, which have been fully assessed. We will review and update the EqIA for our proposed changes with feedback received during the consultation.

5.3.12 Uber submitted that consultees were not given long enough to digest and engage with the additional analysis that was published on 18 July 2025. **Our response:** *Additional data about the impact of the hypothetical scenario of the 100 per cent CVD continuing was provided pursuant to an Environmental Information Regulations (EIR) request during the consultation period. As our response was published on TfL's transparency pages, we made this hypothetical scenario data available on the consultation portal so everyone who was interested in the consultation had equal access to it, but it was made clear that it did not inform the assessment of the consultation proposals we were putting forward in the IIA, other than to help create the baseline for analysis. For fairness and transparency purposes, everyone who had already responded to the consultation was contacted and alerted to the new information (c.2,500 people) and offered the opportunity to update their consultation response (35 people replied). Anyone coming to the consultation website for the first time after 18 July will have had access to all material. Information was published more than two weeks before the end of the original consultation closing date, and the consultation was extended by one week, therefore, allowing those interested in the additional analysis more than three weeks to consider it.*

5.3.13 Various stakeholders (including the Electric London Coalition, Angel Cars Wembley, GMB and Uber) mention that the proposals (including the proposed charge level increase and/or the new proposed CVD) would impose heavy costs on professional drivers, particularly on those who invested in EVs, and the impact this has on those drivers on lower incomes. This impact is quoted by stakeholders as: 'A driver working five days a week would be more than £3,000 worse off per year'. **Our response:** *The withdrawal date of the CVD on 25 December 2025 has been publicly known since 2018 when the CVD was first introduced following a public consultation and Mayoral decision. Anyone purchasing an EV after 2018 has been able to take into account that the CVD was not going to be offered from 2026 and that an EV would be subject to the Congestion Charge, unless the driver qualified for another discount. However, we recognise the need to continue to support those who drive in the CCZ to do so in the cleanest possible vehicle which is why we have consulted on a proposal that seeks to continue to provide sustainable long-term support for our customers to adopt EVs.*

Drivers working for some PHV operators will be able to limit the financial impact of the proposed new CVD through surcharges which apply to trips which start, end or pass through the CCZ which are levied for the purpose of helping drivers cover the cost of the Congestion Charge as recognised in our IIA (section 8.3). However, our IIA recognised that not all will

be able to pass the charge on and may be negatively impacted by the proposed charge level increase from £15 to £18, with a high proportion of drivers on lower incomes.

The new proposed CVD means continuing savings for drivers of EVs versus non-EVs compared to a scenario without the proposals (i.e. 'Do Nothing', see paragraph 5.3.8), with drivers of electric cars, for example, paying £13.50 instead of £18. The proposals also offer a greater incentive for EV drivers than was originally planned following the 2018 Mayoral decision. Finally, a high majority (88 per cent) of respondents to the consultation questionnaire say they go into the CCZ less than five days a week (see paragraph 4.5.5 for analysis of respondents' frequency of travel within the CCZ).

5.3.14 The Royal Borough of Kensington and Chelsea are concerned that the consultation materials do not consider a scenario where the CVD continues as it is today (a 100 per cent discount) or scenarios with other discounts (i.e. 75 or 50 per cent) and would like to know the forecast impacts of these alternative scenarios. **Our response:** *The scope of the IIA is the proposals rather than multiple alternatives (i.e. different percentages of discount) which are not being taken forward as part of the proposals. To assess alternatives which had been ruled out as proposals would have created confusion and unnecessary complexity as to which of the presented datasets were relevant to providing feedback on the proposal being consulted on. To ensure the accessibility of our consultations we aim to present clear, relevant supporting information which informs respondents about the impacts of the proposal being put forward. We seek to strike a balance between providing rigorous data and analysis and making technical information such as modelling accessible for non-technical respondents. Presenting full data and analysis for options not considered viable is not considered necessary to provide feedback on the proposals and increases the volume and complexity of analysis to be read and digested, potentially limiting engagement with the consultation. See also our response in 5.3.9.*

5.3.15 The following stakeholders mentioned their concerns on how the new proposed CVD risks stepping backwards in decarbonising the PHV industry, preventing the EV uptake expected if the CVD were to be extended, and risking a slide back to non-EVs (diesel and/or petrol). Some requested to grandfather the 100 per cent CVD for existing EV PHV drivers, to prevent a slide back to non-EVs.

- Blacklane
- Uber
- BusinessLDN

- GMB

Our response: *In assessing the impacts of implementing the consultation proposals versus not implementing them ('Do Nothing' scenario, see paragraph 5.3.8 and 5.3.14), the IIA allowed us to separate the effects of the proposals from other background changes that might occur over time e.g. general traffic growth and other policies such as EV incentives. Given this, the impact of the proposals would have (i) a traffic reduction effect from the charge level increase, and (ii) an increase in EVs in the CCZ from the introduction of a new set of CVD discounts (compared to a 'Do Nothing' scenario with no CVD). Assessing proposals against a 'Do Nothing' scenario allows to assess the impact of these two effects accurately, resulting in a higher number of EVs, lower traffic volumes, and subsequent emissions reductions in the CCZ.*

The proposals are not expected to result in a slide back to non-EVs in the zone. Non-EV drivers already place a high value on being in the CCZ during charging hours such that it is worth paying the charge, and with the proposals would still be facing a higher charge than EV PHV drivers (£18 versus £13.50). In addition, in a business model where PHV drivers add a surcharge to all trips within central London, PHV drivers of EVs will be more easily able to recoup charges given they face a lower Congestion Charge.

In addition, the market for electric cars, including PHVs, is already developed. Among PHVs, the transition to EVs and ZEC vehicles is already well-progressed, in part due to changes to licensing requirements. These licensing requirements require that vehicles new to licensing must be at least ZEC which excludes the risk of a switch back to diesel or petrol vehicles. The recently published second Taxi and Private Hire Action plan shows that over 53 per cent of London licensed PHVs are now ZEC or fully electric. In February 2025, just over a quarter of the PHV fleet was electric. In addition, the proportion of EVs in new PHV registrations is also increasing, with 71 per cent of new registrations in January 2025 being electric. This is evident in the high proportion of PHVs observed in the CCZ: 32 per cent of all PHVs observed in the CCZ were electric in September 2024, an increase from 23 per cent in September 2022.

We recognise the role PHVs have in achieving the policies and proposals of the MTS, as outlined in Policy 20. Taxis and PHVs are crucial to providing an accessible option or door-to-door service for the trips that cannot be shifted to sustainable alternatives. The Taxi and Private Hire action plan sets out how the taxi trade and private hire industry can continue to reduce their environmental impact and how we will support them in this. As stated in the action plan, Action 14, we will keep supporting the taxi trade and private hire industry to continue to reduce tailpipe emissions, and we will consult with the taxi

trade and private hire industry in 2025/26 on a proposal to introduce a zero emission (at the tailpipe) licensing requirement for taxi and PHVs in the future.

Providing grandparent rights for existing EV PHV drivers is not aligned to the objectives of the scheme or proposed changes. Nevertheless, as explained in paragraph 2.3.4, the proposed new CVD 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.

The additional information published on 18 July 2025 shows that in the hypothetical 100 per cent CVD scenario there are higher numbers of EVs estimated to be in the CCZ compared to our proposals. However, a smaller number of EVs in the CCZ compared to a hypothetical scenario with a 100 per cent CVD does not mean the EVs that are no longer expected to be seen in the CCZ due to the proposals are not expected to have been purchased or be driving in other areas of London, just that they are not observed in the CCZ. The modelling analyses the direct impact of the Congestion Charge on vehicles driving in the zone, and does not include a further modelling exercise or assumption based on the overall rate of the electrification of the vehicle fleet in London (see paragraph 5.3.8).

- 5.3.16 Various stakeholders including Be.EV, Blacklane, BusinessLDN, Centre for Net Zero, Electric London Coalition and Uber (as noted in paragraph 5.3.9 above) raised concerns around the lack of analysis on the impacts of the proposals (or some parts of the proposals) across Greater London, with a focus on the environmental impacts, requesting that additional assessment and modelling to be conducted before implementing the changes. **Our response:** See *paragraph 5.3.8 on the scope of the analysis. It is not disputed that EV PHVs (or vehicles in general) will likely drive the majority of the time outside the CCZ. While we agree that the majority of the emission benefits of individual vehicles eligible for the new CVD would be felt outside central London, the impact is negligible in those areas, as the overall number of additional EVs in central London as a result of the Congestion Charging scheme represents a very small percentage of the London-wide vehicle fleet. Providing London-wide figures is, therefore, considered to be disproportionate to the level of information required to submit an informed consultation response on the impact of the proposed changes to the Congestion Charging scheme, which operates in the central one per cent of London (21 square kms of more than 1500 square kms).*

5.3.17 Be.EV, Blacklane, BusinessLDN suggested giving grandparent rights to professional drivers who are existing CVD holders (early adopters) to protect those who have already invested. BusinessLDN suggested it is unfair to grant residents grandparent rights for polluting cars but not to early adopters. **Our response:** *We proposed to provide grandparent rights to the Residents' Discount to mitigate the impacts of the changes on residents, particularly low income residents. The Residents' Discount is intended for individuals living in the zone, who are unable to avoid the charge if they need to drive during charging hours. While the Residents' Discount provides a substantial discount for drivers, it does not exempt them from paying a charge (equivalent to 10 per cent of the full charge level) to ensure residents are also encouraged to use active and sustainable modes, and they are still subject to ULEZ charges if their vehicle is non-compliant. It is a relatively small group so their driving does not have a significant impact on the traffic and congestion management objectives of the Congestion Charging scheme, and therefore requiring those currently registered for the discount (and who may be reliant upon its long-term provision) to switch their vehicles to electric models to continue receiving this long-standing discount after March 2027 was not considered appropriate. It is not considered appropriate to offer grandparent rights to those registered for the current 100 per cent CVD as this would undermine the scheme objectives of traffic and congestion management, given the already significant presence of EVs in the CCZ, nor would it incentivise further uptake of EVs.*

5.3.18 Be.EV, BusinessLDN, SMMT, and Uber raised concerns about the alignment of the proposals with the air quality and climate objectives of the MTS and the London Environment Strategy (LES) and with Policy 20 of the MTS. They said that we have not sought to balance traffic impacts against other impacts which might have implications for the achievement of objectives in the MTS, including proposal 24.1, and the LES. Be.EV stated that the proposal contradicts National Government Support for EVs. Uber and BusinessLDN noted that there have been changes after 2018 (when the decision was made to end the CVD in 2025) that were supposed to support the EV transition like the central London Zero Emission Zone (ZEZ) and distance-based road user charging that haven't happened and this justifies continuing with the 100 per cent discount. **Our response:** *Each of our road user charging schemes has their own specific objectives which are directed at the achievement of certain MTS policies and proposals. Collectively, they seek to address the triple challenges referred to in proposal 24.1. ULEZ and LEZ are emissions schemes with the primary objective to reduce emissions from vehicles and so reduce toxic air pollution and improve London's air quality for everyone's health. This has also led to a reduction in carbon emissions.²²*

²² <https://content.tfl.gov.uk/london-wide-ulez-one-year-report.pdf>

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 to reduce traffic and congestion. This supports the MTS aim to have 80 per cent of trips in London made by sustainable modes including walking, cycling and public transport, as well as having at least three million fewer daily car trips and 250,000 fewer cars owned in London, both to be achieved by 2041. The MTS also sets out the vision for central London, including the need for a steady reduction in car use, to support the continuing success of such a limited geographical area by ensuring efficient movement. As a consequence, the MTS outcomes for central London are even more ambitious, targeting a 95 per cent mode share for walking, cycling and public transport for trips within central London (up from 90 per cent in 2015) by 2041 and a 99 per cent mode share for walking, cycling and public transport for trips between central London and inner London (95 per cent in 2015) and central London and outer London (90 per cent in 2015) by 2041. Reducing traffic improves conditions for active, efficient and sustainable modes of travel. While not the primary objective, the traffic reduction the Congestion Charge seeks to deliver also contributes to mode shift and achieving reductions in carbon emissions and improvements in air quality within central London. The traffic reduction expected as a result of these proposals is consistent with the outcomes of the MTS and LES, showing a positive impact on air quality and carbon emissions within central London compared to a 'Do Nothing' scenario (see paragraph 5.3.8).

The transition to EVs has been influenced by a combination of policies and it is not uniquely determined by the discount given to EVs in the CCZ. We have a number of policies and programmes which, in combination, have supported and will continue to support a shift to EVs. For instance, the EV infrastructure network in London has grown by over 500 per cent since 2019²³ and we are on track to meet the required number of chargers by 2030. This includes the delivery of rapid and ultra rapid charge points, which are more likely to suit the needs of high-mileage business users such as electric vans and PHVs for top-up charging. We also continue to unlock GLA group land for rapid EV charging, providing new rapid and ultra-rapid charge points on our road network and land. Government grants, tax incentives and schemes such as ULEZ and its associated scrappage schemes with higher support for EVs have further enabled the transition.

The proposals seek to continue the support still needed for Londoners and businesses to switch to EVs, and to support

²³ <https://www.gov.uk/government/collections/electric-vehicle-charging-infrastructure-statistics>

those that have already invested in EVs. They offer a greater incentive than was previously planned, with the CVD due to end in December 2025. Considering the increasing number of EVs and the continuing changes to the EV market, reintroducing a 100 per cent CVD would not be desirable or expedient to facilitating the achievement of the Congestion Charging scheme's objectives and, in turn, the MTS's central aim around mode shift.

5.3.19 SMMT and Uber stated traffic in central London has fallen considerably since 2018 when the decision to end the CVD was taken, showing traffic levels lower than pre-pandemic levels. Uber mentions this effect is greater for PHV and taxi fleets in London which have declined faster than any other mode (0.4 million trips to 0.2 million). SMMT stated that the level of zero emission vehicle use for vans and cars in London remains low, hence these vehicles do not significantly contribute to congestion. **Our response:** *Policy 5 in the MTS states that 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. An expected outcome of this policy is that there are at least three million fewer daily car trips and 250,000 fewer cars owned in London by 2041.*

The MTS also sets out the vision for central London, including the need for a steady reduction in car use, to support the continuing success of such a limited geographical area by ensuring efficient movement. As such, the MTS outcomes for central London are even more ambitious, targeting a 95 per cent mode share for walking, cycling and public transport for trips within central London (up from 90 per cent in 2015) by 2041 and a 99 per cent mode share for walking, cycling and public transport for trips between central London and inner/outer London (compared with 95 per cent and 90 per cent respectively in 2015) by 2041. Proposal 20 of the MTS states that the Mayor, through TfL, will keep existing and planned road user charging schemes, including the Congestion Charge, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy.

While there has been progress on MTS outcomes in terms of the number of cars crossing London's strategic cordons, including the central London cordon, a continued reduction is needed in order to meet this target. This is demonstrated in

TfL's Travel in London 2024 report²⁴, where although fewer cars cross the central cordon in 2023 than in 2019, the indicative MTS trajectory required to meet the Mayor's 2041 aim continues downwards from 2023, showing that further decreases are needed to achieve the MTS aim.

A key aim of this package of consultation proposals is to ensure the Congestion Charge remains effective in managing future traffic levels – not just present-day traffic. While the numbers of trips made in PHVs and taxis have decreased from 0.4 to 0.2 million from 2019 to 2023, these figures are indicative of London-wide changes and are not specific to the CCZ. These figures also include both PHVs and taxis in aggregate, with taxis in London falling by over 20 per cent since 2019/2020 (as noted in our Taxi and Private Hire action plan).

As laid out in section 2.2.3 of the IIA, EVs form a large and increasing proportion of vehicles in central London, particularly among PHVs and cars. See previous response (paragraphs 5.3.15 and 5.3.22) evidencing the successful transition of PHVs to EVs. This transition is expected to continue, raising the proportion of vehicles eligible for the new CVD over time. The traffic impact of these additional EVs being driven in central London needs to be managed appropriately and sustainably, including by offering a well-balanced level of discount under the new CVD, providing support for EVs while seeking to manage their contribution to traffic volumes in the CCZ.

5.3.20 The following stakeholders suggest continuing a 100 per cent discount for small and medium businesses and/or charities, with some specifically suggesting a 100 per cent discount for electric vans, HGVs and quadricycles operated by a SME or charity. Some stated that this should run up to 2030 or 2035.

- City of London
- Clean Cities
- EVA England
- London Borough of Lambeth
- Open Letter Charities and CICs
- Westminster City Council

²⁴ Figure 27 of the Travel in London 2024 Annual Overview: <https://content.tfl.gov.uk/travel-in-london-2024-annual-overview-acc.pdf>

- Elly Baker AM (on behalf of Labour Assembly group)
- Mums for Lungs
- T&E UK

Our response: *The current proposals have sought to consider the challenges faced by organisations using vans in London when switching to EVs and this is reflected in the higher proposed discount level. Businesses (the majority of which are SMEs) and charities benefit from reduced traffic in the zone, as well as the proposed higher-level discount. The proposals seek to balance long term support for electric vans with the need to manage traffic, including van traffic, in central London. A higher discount could disincentivise switching to more sustainable options e.g. cargo bikes and could incentivise a switch from car to van.*

Managing freight and servicing trips has benefits in terms of reducing air quality and carbon emissions and achieving Vision Zero. The MTS has an objective to reduce the number of lorries and vans entering central London during the weekday morning peak by 10 per cent from 2016 levels, by 2026. This reflects pressures on the road network at this time of the day and will help to reduce road danger. Since the pandemic, the reduction in vehicles has meant this target has been met, but prior to this van numbers had been increasing and in the period 2017/18-2018/19 they were above the target. In 2024, although below the target, van traffic increased. It remains important to reduce motorised freight trips to avoid vehicle numbers returning to pre-pandemic figures and support the MTS Policy 3 for reducing road danger and achieving Vision Zero by 2041. We must also continue to encourage a shift to the most efficient and sustainable options for these journeys. This includes re-timing journeys where possible to avoid peak periods, switching to EVs and making it easier to make some trips using more sustainable modes such as cargo bikes.

- 5.3.21 Elly Baker has supported the automatic registration for the CVD through Auto Pay, but raised concerns about the requirement not being understood by drivers. London TravelWatch 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.
- Our response:** *Customers are usually required to register for discounts to the Congestion Charge, unlike exemptions which are usually automatic. Registration (including an annual £10 registration fee) has been part of the existing CVD and its predecessor discounts. We know that some customers using EVs have not been registered for the CVD but still benefit from the discount (given that we have been able to recognise they are EVs and therefore not issue a PCN) will now need to take some action. We have proposed that customers must register for Auto Pay (or Fleet Auto Pay) in order to qualify for the new CVD. Given the discount is no longer 100 per cent, drivers have to take some administrative steps to comply with the*

scheme rules, either by registering for Auto Pay or paying the charge at full rate. Registration for Auto Pay, which is free and does not require an annual renewal fee, has increased steadily since it was first introduced (after Fleet Auto Pay) in 2011 and 80 per cent of all Congestion Charge payments are made via Auto Pay. It brings benefits to the customer by removing the risk of receiving a PCN for non-payment. Those customers who are already registered and have their EVs active on Auto Pay do not need to take further actions. Should the Mayor approve this proposal, we would undertake a comprehensive customer communication campaign to ensure details about Auto Pay and the need to register are widely disseminated.

5.3.22 Elly Baker AM has also stated that more needs to be done to understand PHVs, getting data from the sector. **Our response:** *We regularly engage with PHV operators, and we have used the available relevant data to inform our assessment. In the consultation materials we presented data on the prevalence of EVs in the CCZ, including the prevalence of PHVs, noting that the transition of these vehicles to electric and ZEC is already well-progressed, due in part to licensing requirements.*

While we have good partial data on the supply side of the market (including the number of drivers, vehicles and private hire operators licensed in London), our observed data is more limited in terms of demand, in particular, around the number of trips undertaken or where demand is located. We can only put in place requirements for the grant of a licence and licence conditions in relation to its regulatory functions and for safety reasons. Sometimes we have data sharing arrangements in place, on a voluntary basis, regarding a specific project or matter being considered by us. As set out in our Taxi and Private Hire action plan²⁵, we will continue to call on the Government to make the legislative changes required to give us the powers to mandate data sharing and requiring licensees to share relevant data, including passenger journey information, to improve transparency and safety for passengers and drivers.

5.3.23 Clean Cities and T&E UK recommended to have an end date for the CVD for cars by 2034, suggesting there will be good enough second-hand market to allow affordable EV cars. Similarly, Possible Foundation stated their support to the proposed CVD but requested to add an end date of 2035. **Our response:** *In this consultation we have not specified an end date for the new CVD for any vehicles. For cars specifically, we proposed that there would be a 25 per cent discount from January 2026, with this discount halving from March 2030. We have also proposed that there would be a different approach to*

²⁵ Taxi and private hire action plan 2025 TfL, 2025 <https://tfl.gov.uk/corporate/publications-and-reports/taxi-and-private-hire>

making routine increases to the charge levels going forwards to maintain its deterrent effect in the context of inflation. Given these expected charge increases and the proposed reductions to the discount, it would be expected that the discount would be less impactful over time and for this reason it is not considered necessary to specify an end date at this time. However, in line with Proposal 20 of the MTS we will keep existing and planned road user charging schemes, including the Congestion Charge, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy, and if necessary, we could bring forward other changes for public consultation in the future.

5.3.24 London Borough of Islington raised concerns around the financial implications the proposals could have for councils, requesting the expansion of the eligibility criteria for the 100 per cent discount to council fleets to include a broader range of vehicles used in the delivery of essential services to residents. **Our response:** *A 100 per cent discount from the Congestion Charge is available to certain operational vehicles used by the boroughs and certain other agencies in the CCZ; this is known as the Selected Partners discount. It includes, for example, refuse collection vehicles. The discount recognises the unavoidable need to operate these types of vehicles in the zone given the responsibilities of these partners. The criteria for this discount are carefully specified so as to not undermine the traffic and congestion management objectives of the Congestion Charge by having a large number of vehicles not paying the charge. Certain vehicles which are currently registered for the CVD may be eligible for the Selected Partner discount and we are in contact with the relevant customers on this matter. However, it is not considered appropriate to change the criteria of the discount so that it encompasses all the vehicles operated by host boroughs which previously would have qualified for a 100 per cent CVD.*

5.3.25 BusinessLDN, Pathway Couriers, Bolt and Uber have requested PHVs to be classified as commercial and/or essential drivers in the same way as vans, HGVs and taxis, with 77 per cent of PHV drivers qualifying as small businesses, asking for a higher percentage of discount. **Our response:** *The IIA (6.2.1.4) states that most PHV operators (rather than PHV drivers) are small businesses, with almost 77 per cent having only a maximum of 10 PHVs available to them to carry out PHV bookings. Unlike taxis, PHV operators have the flexibility to set their own fares, add surcharges for trips which start, end or pass through the CCZ or simply charge more for journeys undertaken in an EV.*

The proposed differential discount levels for the new CVD are not based on the purpose for which the EV will be used or the status of the owner but rather on the need to support the shift to the particular EV type. Van and HGV operators and owners face more challenges in the take-up of EVs compared to cars including PHVs, such as the relatively higher costs of vehicle purchase, which is why the new CVD proposes a higher percentage of discount for them. The market for electric cars is

more developed, with competitive purchasing costs for EVs relative to non-EV options, while for vans and especially for HGVs, the range of models available is much more limited and less affordable. The transition to electric cars including those being used as PHVs – which the CVD has supported – has already been successful. PHV licensing requirements are a key measure for influencing PHV vehicle choice and require that vehicles new to licensing must be at least ZEC. In February 2025, just over a quarter of the PHV fleet was electric. This is evident in the high proportion of PHVs observed in the CCZ: 32 per cent of all PHVs observed in the CCZ were electric in September 2024, an increase from 23 per cent in September 2022. In addition, the proportion of EVs in new PHV registrations is also increasing, with 71 per cent of new registrations in January 2025 being electric.

5.3.26 GMB has suggested keeping a 100 per cent CVD for PHV drivers, couriers and essential workers, and raising the charge for everyone else to £20 to compensate for revenue losses. Toyota has suggested a 100 per cent CVD for all vehicles and as a secondary option keeping a 100 per cent CVD for PHVs, vans and pickups only with a 50 per cent CVD for private cars until 2035. **Our response:** *The objective of the Congestion Charging scheme is to manage traffic and congestion in central London. In line with Proposal 20 of the MTS we keep existing and planned road user charging schemes, including the Congestion Charge, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy. From time to time it is appropriate to make changes to some or all elements of the scheme in order to maintain its effectiveness in achieving this objective. The proposed differential discount levels for the new CVD are not based on the purpose for which the EV will be used or the status of the owner but rather on the need to support the shift to the particular EV type. The level of discount proposed for each vehicle type is considered the appropriate level to balance the need to manage traffic and congestion in the zone with encouraging the uptake of EVs for those that drive in the CCZ. See response to 103 and 104 for more detail.*

Although the scheme seeks to achieve its objectives through the imposition of a charge to disincentivise non-essential vehicle use, its purpose is not to raise revenue. All net revenue from the Congestion Charge must be used to further the aims of the MTS, which includes improving public transport and making enhancements for people walking and cycling.

5.3.27 Royal Mail stated that the CVD registration should be automatic to reduce the costs for businesses. **Our response:** *Under the proposed new CVD, customers would need to be registered for Auto Pay only (already 80 per cent of payments are made by Auto Pay) but not for the discount itself. Customers that are already registered for Auto Pay and have their EVs active on Auto Pay do not need to take further action. This is because we will be able to identify the vehicle's fuel type from*

the associated DVLA vehicle record. The administrative burden on customers would effectively be the same with the requirement to complete one type of registration in order to have the benefit of the proposed new CVD. There is no charge to sign up to Auto Pay (there is a £10 annual registration fee for the current CVD) so the cost burden for customers would also be reduced. The only exception is customers who need to provide evidence that their vehicle is an EV because the DVLA's vehicle record for their vehicle is incorrect, not up to date or does not exist because their vehicle is registered with a licensing authority outside the UK.

5.3.28 SMMT have stated that the Auto Pay requirement is unfair for those drivers who do not regularly travel into London, and that the CVD should be available regardless of payment method (i.e., vehicles coming from Europe). Similarly, Westminster City Council object to Auto Pay requirement both for the CVD and Residents' Discount. **Our response:** *It is already the case that residents who wish to use the Residents' 90 per cent Discount need to register for Auto Pay. As the remaining charge is relatively low (i.e. 10 per cent of the daily charge), this makes collecting the payment more efficient and less costly than other methods. This also has benefits for the customer in terms of removing the risk of receiving a PCN for non-payment. For similar reasons, we have also proposed that in order to receive the new CVD, customers must register for Auto Pay. While we recognise that there is a small percentage of people in the UK who do not have access to banking (around 1.3 per cent), it is considered likely that only a very small number of people would be both living in the CCZ and also have access to a car, or would be travelling into the CCZ in an EV (especially at a frequent rate). Nevertheless, certain pre-payment bank cards may be used in connection with Auto Pay for those customers who do not have a bank account. The customer would need to check that their specific pre-payment card may be linked to Auto Pay and that it allows for recurring variable card payments. They should also be aware of the fees their card issuer may impose when using a pre-payment card. There is no proposal to change the requirement for the Residents' Discount and proposed new CVD to be payable only by Auto Pay, which has no registration fee. Non-UK motorists may also register for Auto Pay.*

5.3.29 SMMT have requested 100 per cent discount for zero emission minibuses until 2035 and coaches until 2040, given their role in tourism and the local economy. **Our response:** *Coaches and minibuses are not in scope for the new CVD (or the existing CVD) because, as vehicles with nine or more seats, they are exempt from the Congestion Charge.*

Changes to the Residents' Discount

5.3.30 Table 5-6 provides a summary of the comments received on the proposed changes to the Residents' Discount.

Table 5-6: Responses to issues raised on the proposed changes to the Residents' Discount (excluding impacts)

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
140	Suggest there should not be a Residents' Discount	35	2	Since the start of the Congestion Charging scheme in February 2003, eligible residents in the zone have benefited from a 90 per cent discount. This relatively high discount recognises that residents are unable to avoid the charge if they drive in the zone. They are still required to pay a small charge in recognition of 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 and other sustainable alternatives. We are not proposing to withdraw the Residents' Discount.
141	Concern that continuing to provide Residents' Discount will not reduce congestion/discourage car use	16	5	The 90 per cent Residents' Discount is set at a level which recognises that residents who live in the CCZ and drive during charging hours are unable to avoid the charge. However, their trips do contribute to congestion in an area which is well served by public transport and other sustainable alternatives. As the main aim of the Congestion Charging scheme is to manage traffic and congestion, it is considered appropriate that residents are subject to a charge albeit at a highly discounted rate. The proposed changes to the Residents' Discount (from March 2027) will mean that the discount will only apply to the cleanest vehicles for new applicants to the discount. This may reduce the number of vehicles it applies to, making it more attractive to move away from car ownership, and instead, use a car club EV based in the CCZ which would attract a 100 per cent discount.
142 and 147	Suggest Residents' Discount should be higher (i.e. higher than 90 per	78	1	See response to 140.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	cent)/residents should be exempt Suggest Residents' Discount should be higher (i.e. higher than 90 per cent) for electric vehicles/new applicants			A higher level discount would decrease or (in the case of a 100 per cent discount) fully remove costs to residents. It is important that residents, like other drivers, are discouraged from making trips by motor vehicles where possible, and this also applies to EVs. Central London is highly connected by public transport and provision for active travel. The tightly constrained road space needs to be well managed and a higher level of discount could lead to increased levels of car use by residents which would undermine the benefits of the scheme and other MTS objectives.
143	Suggest Residents' Discount should be lower (i.e. lower than 90 per cent)	33	3	See response to 141.
144	Suggest Residents' Discount should only be provided for those with EVs (general comment)	9	1	As set out in 146, we are proposing changing the vehicle eligibility criteria of the Residents' Discount from 1 March 2027 so that new applicants will only qualify if they have an EV. Residents who have registered prior to this date would not be subject to the new vehicle criteria and would enjoy 'grandparent rights', provided that the discount's other eligibility criteria continue to be met and timely renewals are made. It is not considered appropriate to apply the change to residents who have already registered for the discount on the basis of the existing rules. We are also providing new or prospective residents and existing residents who are not registered for the discount adequate notice of the new rule by delaying its implementation until 1 March 2027. The rationale for the discount - that residents who choose to drive have no choice but to drive within the zone - has not changed in principle but is now being updated in order to support residents in switching to EVs.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
145	Support/agree with the proposed Residents' Discount for new applicants (i.e. applying to only EVs from March 2027 for new applicants)	33	5	Support is noted.
146	Oppose/disagree with the proposed Residents' Discount for new applicants only applying to EVs/should continue to provide it for all types of vehicles	171	4	Because the Residents' Discount has always offered a relatively high discount (90 per cent), the greener vehicle discounts which have been offered over the years have had less influence on a resident's choice of vehicle. In the context of the proposed new CVD, as well as the greater availability and uptake of EVs in recent years compared to 2003 when the Congestion Charge and the Residents' Discount were first introduced, it is appropriate that we review the vehicle eligibility criteria element of the Residents' Discount in line with MTS proposal 20. The consultation proposal to limit the Residents' Discount to EVs for new applicants from 1 March 2027 supports the proposed new CVD and the objective that if a person drives in the CCZ during charging hours, they are incentivised to do so in the cleanest possible vehicle. As well as aligning with MTS policies and proposals on reducing private car use in favour of active, efficient and sustainable modes, our proposal reflects the London Plan approach of promoting car-free residential development in central London, as well as supporting the reduction of air quality pollutants and carbon emission as secondary benefit. To mitigate the impact on existing residents who may have based their vehicle choice on the expectation that this long-standing

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				discount would remain in place, we are proposing that residents who have registered for the Residents' Discount prior to 1 March 2027 would retain their discount regardless of their vehicle's fuel type, now and in the future. These 'grandparent rights' would apply to residents who were registered for the discount before 1 March 2027, provided that the discount's other eligibility criteria continue to be met and timely renewals are made. It is not recommended that we continue to provide the Residents' Discount in its current form to all residents and vehicles beyond 1 March 2027. However, in response to feedback received during this consultation, we are now recommending an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030. Residents who are applying from 1 March 2027 to 4 March 2030 will receive grandparent rights (a 90 per cent discount regardless of fuel type) if they are in receipt of certain benefits. However it is recommended that the proposed date of 1 March 2027 would apply for other residents not in receipt of these benefits. More information on these recommendations and the rationale for them is given in the Stakeholder Comments section below this table. The issue of the impacts on residents is also addressed in section 5.4 of this report.
148	Suggest Residents' Discount should be lower for EVs/new applicants (i.e. lower than 90 per cent)	1	0	See response to 140.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
149	Concern about the lack of affordable EVs/concerns about performance/sufficient charging infrastructure	329	36	While a new EV costs more to buy up front, today most drivers in the UK (around 80 per cent) will buy their cars on the used market. The number of used EV purchases has grown by over 50 per cent (54.6 actual) comparing data from the first quarter of 2024 to 2025, increasing the pool of used vehicles available.²⁶ Owning and buying an electric vehicle (EV) is becoming cheaper, with 2 in 5 of used electric cars sold at under £20,000 and 33 brand new electric car models available from under £30,000.²⁷ The price gap for new cars has continued to decrease over the past few years. Some industry data indicates that the purchase price premium of an EV – relative to an equivalent ICE vehicle – was as low as only 12 per cent in 2024 and price parity may be reached in 2026.²⁸ Many workplaces provide salary sacrifice schemes, which can reduce the cost of purchasing an EV. To support this, company car tax is favourable for EVs at only three per cent. The government has confirmed that company car tax for EVs will increase one per cent each year from 2025 to a total of five per cent in April 2028. By contrast, the most polluting cars will pay 37 per cent company car tax in 2028. EVs receive favourable first-year rates of vehicle excise duty at £10.

²⁶ [Marketcheck reveals more EVs have been sold in the UK than ever, at the lowest ever prices - Marketcheck](#)

²⁷ [Discount of up to £3,750 on electric cars set to slash costs for thousands - GOV.UK](#)

²⁸ [Price Parity 2024: The Final Mile — New AutoMotive](#)

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				During the consultation period, the Government announced supporting the purchase of electric cars, vans and HGVs. The £650m Electric Car Grant²⁹ and the extension to the plug-in van and truck grant³⁰ until at least 2027, will reduce the costs of vehicle purchase for individuals and businesses. In many cases, an EV is cheaper to run than a petrol or diesel car, with lower maintenance and repair costs. Recently published independent research suggests an average saving of £700 a year³¹. It is predicted that someone buying a new EV next year will recoup the additional upfront cost within five years due to lower running costs. There are more than 25,509 public charging points across London³² which means that the EV infrastructure network in London has grown by over 500 per cent since 2019³³ and that we are on track to have more than 40,000 charge points by 2030. This includes the delivery of rapid and ultra rapid charge points, which are more likely to suit the needs of high-mileage business users such as electric van users for top-up charging.

²⁹ 5 August 2025 [First car models approved for £1,500 discount to turbocharge the move to electric - GOV.UK](#)

³⁰ 18 August 2025 [Government discounts for electric vans and trucks extended - GOV.UK](#)

³¹ Energy & Climate Intelligence Unit, Dec 2023 (accessed 15 Sept 2025) [Energy & Climate Intelligence Unit | New analysis: petrol car drivers...](#)

³² <https://lruc.content.tfl.gov.uk/electric-vehicle-infrastructure-strategy-2025.pdf>

³³ <https://www.gov.uk/government/collections/electric-vehicle-charging-infrastructure-statistics>

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				We also continue to unlock GLA group land for rapid EV charging, providing new rapid and ultra-rapid charge points on our road network in addition to the 300 rapid charge points we have already delivered. In December 2024, Places for London, our property company, entered into a joint venture partnership with charge point operator Fastned to develop a network of new ultra-rapid charging hubs across our estate. Each hub site will deliver at least six ultra-rapid charging bays and will use 100 per cent certified renewable energy. Construction at the first site in Hatton Cross has commenced and is expected to be operational by early 2026. We, along with the Mayor and other organisations, have also been calling for the extension of the plug-in van grant to 2026, which has recently been confirmed by the Government. Grants are also available for organisations, including businesses and charities, towards the cost of installing charge points at their sites.
150	Suggest phasing out the Residents' Discount over time, including for ICE vehicles or with a sliding scale	19	3	The rationale for providing the Residents' Discount (see 140) has not changed, and so there is no proposal to phase it out over time. However it is proposed that, after 1 March 2027, a change to the vehicle eligibility criteria is made so that new registrations will only be accepted in respect of EVs. This will support the changes to the CVD which are also proposed, and the MTS objectives related to air quality and carbon. Our proposal would retain grandparent rights for residents who register their vehicles before 1 March 2027, and we are recommending an additional period (until 4 March 2030) for residents in receipt of certain benefits (see section 2.5). This is considered the appropriate way to balance a need to align the

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				Residents' Discount with the new CVD while giving sufficient notice to residents.
151	Concern/queries about how the Residents' Discount will work/how it will be applied	22	0	Information about how to apply for the 90 per cent Residents' Discount is available on our website: Discounts and exemptions for Congestion Charge and Blackwall and Silvertown tunnels charge - Transport for London . This information would be updated if the proposal is approved by the Mayor.
152	Other comment/suggestion for Residents' Discount/for new applicants We received other comments about exemptions which we have noted. Comments included: - Other residents in London should qualify for the discount, including those in inner London - Unfair to reduce CVD but not reduce Residents' Discount for residents with EVs - Residents' Discount should still apply to	63	12	<u>Our response to 'Other residents in London should qualify for the discount, including those in inner London':</u> The Residents' Discount only applies to residents of the CCZ because residents who choose to drive have no choice but to drive within the zone. Londoners living outside of the zone face a choice to drive into the zone, which the charge seeks to discourage – instead encouraging a shift to active and sustainable modes for journeys into the CCZ. <u>Our response to 'Unfair to reduce CVD but not reduce Residents' Discount for residents with EVs':</u> The rationale for the Residents' Discount (see response 146) differs from the rationale for the new CVD (see 101). <u>Our response to 'Residents' Discount should still apply to ICE vehicles at a lower rate':</u> Our proposal would retain grandparent rights for residents who register their vehicles before 1 March 2027, and we are recommending an additional period (until 4 March 2030) for residents in receipt of certain benefits (see section 2.5). This is considered the appropriate way to balance a need to align the

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	ICE vehicles at a lower rate - Extend CVD to hybrid vehicles - Limit the number of times a Resident discount can be used - Older residents to not pay any Congestion Charge - Will not make any difference to traffic - Offer a 12-month Residents' Discount - Offer it based only on need, including financial need or on Blue Badge, or when trip is to leave the CCZ - Oppose grandparent rights - Support residents to buy EVs			Residents' Discount with the new CVD while giving sufficient notice to residents. <u>Our response to 'Extend CVD to hybrid vehicles':</u> The new CVD would be available for hydrogen-powered vehicles as is the existing CVD. Previous iterations of the green discount have used other criteria but since 2018 it has been available only to battery electric or hydrogen fuel cell vehicles only. This is considered appropriate given the development of vehicle technology and availability in recent years. <u>Our response to 'Limit the number of times a Residents' discount can be used':</u> There are no limitations on the number of journeys any discounts or exemptions for the Congestion Charge can be used for and this is not proposed. <u>Our response to 'Older residents to not pay any Congestion Charge':</u> This would not support the scheme's objectives. The Residents' Discount mitigates the effect of the CCZ on residents in the zone who, if they own a vehicle have no choice over whether to drive in the CCZ. In addition, there will remain the 100 per cent discount for Blue Badge holders and exemption for vehicles in the disabled tax class. In addition, in order to mitigate the impact of the changes to the discount on residents, we are proposing that those residents that have registered for the discount before March 2027 would

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				retain their discount regardless of their vehicle's fuel type, now and in the future. <u>Our response to 'Will not make any difference to traffic':</u> The changes to the Residents' Discount are part of a package of proposals. On an average weekday during the first year of implementation (2026), the impact of the package across all assessed modes during charging hours (07:00-18:00), is anticipated to result in a two per cent reduction in vehicles, equivalent to approximately 2,200 fewer vehicles per day. <u>Our response to 'Offer a 12-month Residents' Discount':</u> This is not proposed. The rationale for providing this discount remains relevant beyond a fixed period, albeit we are proposing a change to the criteria for new residents in future. <u>Our response to 'Offer it based only on need, including financial need or on Blue Badge, or when trip is to leave the CCZ':</u> A needs-based discount is not proposed and would be very difficult to define or enforce. As described above we are proposing modifications to mitigate the impact on low-income and other residents. Limiting the discount based on direction of travel would not recognise the constraints faced by residents who choose to drive and would also be impracticable. A 100 per cent Blue Badge discount remains available. <u>Our response to 'Oppose grandparent rights':</u>

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				These are proposed in order to mitigate the impact on existing residents who may own a vehicle in the expectation that this long-standing discount would remain in place and for prospective residents who have been planning to move into central London before March 2027. Residents who have registered for the Residents' Discount prior to 1 March 2027 would retain their discount regardless of their vehicle's fuel type, now and in the future. <u>Our response to 'Support residents to buy EVs':</u> In central London, there are extensive alternatives to car ownership and use and we have a high (95 per cent) sustainable mode share target in this area. While we are supporting residents to choose to use an EV where they drive, it is not appropriate to provide further support towards the purchase of EVs.

Other stakeholder comments – Residents' Discount

5.3.31 We have noted these additional comments from stakeholders that are not included in the tables above.

5.3.32 Westminster City Council, BVRLA, Clean Cities, CoMoUK, EVA England, London Cycling Campaign, T&E UK and Zipcar said that the Residents' Discount should apply to residents of the Congestion Charging zone using car clubs. These respondents noted that the new CVD means that EVs in car clubs (under these proposals) would get a lower discount than residents who own ICE vehicles and that this could undermine the MTS and scheme objectives as car clubs may reduce private vehicle ownership and congestion. **Our response:** *Our proposals at consultation did not include a greater discount for electric car club vehicles, which meant they would have received the same discount as electric cars (25 per cent discount*

from 2 January 2026, reducing to 12.5 per cent from 4 March 2030). However, in response to comments received during consultation regarding the potential impacts of the proposed changes to the Residents' Discount on low-income residents of the CCZ, we are now recommending that two modifications are made as mitigations to the proposed changes to the Residents' Discount. In relation to car clubs, we are recommending a specific new 100 per cent discount for back to base car club EVs based in bays in the CCZ. This would act as a mitigation to the proposed changes to the Residents' Discount for existing and future residents, particularly those on low incomes who may require a vehicle to travel and for whom it may be harder to access EVs, without which they would have to pay the full user 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. Car club vehicles which are licensed for use as PHVs are excluded. The second mitigation – 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 – is described in the following paragraph. 5.3.36

5.3.33 Clean Cities stated that the proposed grandparent rights for the Residents' Discount undermine the new proposed CVD and that it should only be available for EVs after 2035. Westminster City Council proposed that after 2030, existing holders of a resident discount should retain the discount until they replace their vehicle and that only residents who replace their vehicle with an EV would retain the discount. **Our response:** *We did not specify an end date for the proposed amended Residents' Discount (nor for the new CVD) and it is not considered appropriate to do so in light of the continuing application of the original rationale for its introduction. However, we keep the Congestion Charge under review to ensure it proves effective in furthering or delivering the policies and proposals of this strategy, in line with Proposal 20 of the MTS. The date of 1 March 2027 provides an appropriate notice period for existing and prospective residents; moving the date to 2035 would further delay the alignment with changes to the CVD (although, as explained in this section, we are recommending an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030). There are no plans to remove grandparent rights for those that will be granted with it associated with their vehicle replacement choice. However, it would also be expected that, as part of the normal vehicle replacement cycle, that ICE vehicles would be replaced over time with EVs, given the Government commitment to end the sale of purely petrol or diesel cars by 2030.*

5.3.34 The SMMT said that businesses registered in the zone with zero emission vehicles should be eligible for the Residents' Discount. They also said that it was unclear how many zero emission cars using the zone belonged to residents and that this should be modelled to aid understanding of the proposal. **Our response:** *The Residents' Discount is intended for private individuals living in the zone and is not available for businesses and there is no proposal to change this criterion. Offering*

this discount to businesses would undermine the scheme objectives of traffic and congestion management, given the high density of businesses in central London and the constrained road space available. Businesses benefit from reduced congestion and more reliable journey times as a consequence of the Congestion Charging scheme and the proposed changes, as non-essential traffic is deterred, and this reduces traffic and the associated delay and cost of congestion. We are committed to supporting businesses in the shift to electrification and, as set out in response 149 above, this includes charging infrastructure. We are also proposing that electric vans and HGVs would have a higher discount than electric cars, recognising the challenges facing this sector in moving to EVs. The number of residents, and by extension the estimated number of new residents, using EVs is not anticipated to affect the impact the assessment presented.

5.3.35 The City of London supported the proposal but said we should consider attaching the Residents' Discount to the vehicle rather than the resident so that when residents buy a new vehicle they are incentivised to purchase an EV. **Our response:** *The Residents' Discount has been in place since the Congestion Charging scheme began in 2003, its rationale being that residents are unable to avoid the zone if they need to drive. At the same time, we are committed to supporting electrification of the vehicle fleet in order to contribute to MTS objectives and the CVD is one of the ways in which to support this, and which has not so far influenced residents' vehicle purchase as much as it could, owing to the 90 per cent Residents' Discount. The proposal seeks to balance the continuing provision of the Residents' Discount for those residents who are currently registered on the basis of their existing vehicle which they may not be able to replace easily while also proposing that the vehicle eligibility criteria for the discount will change for existing residents who are not registered, typically because they do not own a car, and future residents who move into the zone and apply for the discount after March 2027, giving them sufficient notice of the change. As mentioned previously, we expect that residents who will have the benefit of grandparent rights will eventually replace their ICE vehicles with EVs, given the Government commitment to end the sale of purely petrol or diesel cars by 2030.*

5.3.36 LB Camden and London TravelWatch asked about the impact of the proposed changes to the Residents' Discount on low-income and disabled residents who do not qualify for a Blue Badge. **Our response:** *We consulted on proposals that would mean any new resident in the CCZ would need to have an EV to qualify for the Residents' Discount after 1 March 2027. Eligible residents applying prior to this date would receive grandparent rights, but residents applying after this date would need to have an EV to be eligible for the discount. In the IIA, we assessed this proposal as having a potential negative impact on low-income, disabled people and older people but that this would be minor owing to the extended deadline to March 2027. However, feedback during the consultation has led us to reconsider this and develop a further mitigation as part*

of this element of our proposals to further support those who may be less able to afford or access an EV but may require a vehicle to travel as a resident of the CCZ.

We are therefore recommending that there is an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030. Residents applying from 1 March 2027 to 4 March 2030 will receive a 90 per cent discount regardless of fuel type if they are in receipt of certain benefits.

We are using these benefits as they capture people on low incomes and unemployed people, disabled people, older people, and informal carers who may require a vehicle to support someone. This acts as a further mitigation for people who may have reduced ability to afford or access an EV living within the CCZ and requiring a vehicle. This mitigation would apply up to 4 March 2030 as it is considered that by this date, the EV market, in particular the second-hand market for EVs, will have developed. The date also aligns with the Government mandate to ban the sale of new diesel and electric cars from 2030. Extending this for eligible residents would mean that those applying before 2030 would retain grandparent rights, mitigating the affordability impact of the higher upfront cost of an EV. This acts as a further temporary mitigation for people who may have reduced ability to afford or access an EV living within the CCZ and requiring a vehicle.

As noted at the start of this section, we are also recommending a specific new 100 per cent discount for back to base car club EVs in bays in the CCZ as a mitigation to the proposed changes to the Residents' Discount for existing and future residents on low incomes who may require a vehicle to travel and for whom it may be harder to access EVs, without which they would have to pay the full user charge for travel in the CCZ during charging hours.

Changes to the Mayor's Guidance

5.3.37 Table 5-7 provides a summary of the comments received on the proposed changes to the Mayor's Guidance.

Table 5-7: Responses to issues raised on our proposal for changes to the Mayor's Guidance (excluding impacts)

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
210	Support/agree with allowing changes to be made to scheme without consultation (general comment)	1	0	Support is noted.
211	Oppose/disagree with allowing changes to be made to the scheme without consultation/concern about accountability/transparency/suggest all changes should be consulted on (general comment)	12	6	The purpose of the proposed revision to the Mayoral Guidance is to bring the procedure for making certain changes to road user charging schemes in line with the procedure which applies when TfL makes changes to its other chargeable services. For example, neither we nor the Mayor consults on increases to passenger fares (nor do other train operating companies). The proposed revision to the Mayor Guidance would allow for charge levels to be aligned with Tube and TfL railway passenger fares thus ensuring that the cost of driving in central London remains proportionate to the cost of travelling by public transport. Clear alignment between the level of the Congestion Charge and public transport fares would support the achievement of the scheme's objectives and, in turn, the sustainable transport mode share aim of the MTS. This revised procedure would also enable smaller incremental increases to be made instead of bigger, spaced-out increases which would allow for businesses and other customers to plan better. It should also be noted that these increases would not

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				automatically occur every year. We and the Mayor would need to follow the same procedure to implement a routine charge level increase as applies now, except that there would no longer be an expectation that TfL would consult. We would undertake an EqlA each time and this would inform the decisions of TfL and the Mayor as to whether to put forward and proceed with the routine increase. To have effect, the new charge levels would need to be set out in a variation order which is confirmed by the Mayor. Customers would be given appropriate notice of any changes. Non-routine charge level increases (that is proposals to increase the charge level higher than the metrics provided for in the revised Guidance) would still be subject to the mayor or minor variation procedure set out in the Mayoral Guidance which sets out the Mayor's expectations for consultation.
212	Support/agree with allowing increases to charge levels without consultation (based on Tube/TfL railway fares/annual inflation)	61	12	Support is noted.
213	Oppose/disagree with allowing increases to charge levels without consultation (based on Tube/TfL railway fares/annual inflation)	26	9	See response to 211.
215	Oppose/disagree with allowing procedural/administrative changes to be made to schemes without consultation	0	1	The new proposed procedure for making procedural or administrative changes is considered to be fair given the nature of these changes and the process that we follow in other comparable circumstances. We would continue to

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				consult the public and stakeholders on minor and major variations to the scheme.
217	Comment about the proposed change to minimum consultation periods/time frames. Comments included: - Support and opposition to the changes to the minimum consultation period for variations to the scheme order, including the comment that we should continue to use the five and ten week minimum periods referred to in the guidance for minor and major variations respectively.	7	6	The proposed amendments provide for the <u>minimum</u> consultation periods specified in the Guidance to be reduced, typically from 10 weeks to 6 weeks. The length of a specific consultation period will, in practice, be determined by numerous factors, for example, the complexity of the proposals being consulted on, the volume of consultation materials, time of year and the likely interest in the proposals. A 6-week consultation period is in line with the length of time we usually undertake consultations for in comparable circumstances. It is also similar to the length of time that other local authorities consult for in respect of their road user charging schemes, for example, clean air zones. The now widespread use of digital communication and the consequential change in customers' expectations and experience around how we undertake consultations means that we typically consult for a shorter period of time than we did in 2007 when the consultation periods set out in the Guidance were suggested.
218	Other comment/suggestion about mayoral guidance. Comments included: - Difficulty of finding proposals related to this proposal	6	6	<u>Our response to 'Difficulty of finding proposals related to this proposal':</u> Information relating to this proposal, including the text of the draft revision, was included with the other proposals in the consultation materials and on our Have Your Say page.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	- Guidance gives too much power to the Mayor			There was a separate question (Q16) on the survey inviting views on this matter. <u>Our response to 'Guidance gives too much power to the Mayor':</u> The changes proposed to the Guidance would not confer additional power on the Mayor or TfL. We have no further proposals related to the Mayor's Guidance at this time.

Other stakeholder comments – Mayor's Guidance

5.3.38 We have noted these additional comments from stakeholders that are not included in the tables above.

5.3.39 The Association of International Courier & Express Services (AICES), DHL, SMMT and Royal Mail 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. DHL stated there should be a five-year review cycle. **Our response:** *While it is understood that commercial operators and drivers are not making exactly the same decisions as private individuals with regard to whether to use public transport or drive, it is the case that businesses experience and manage inflation in relation to the cost of materials and labour. Some commercial operators may be able to make a decision to re-time their operations or use a different vehicle type (e.g. cargo bikes). Commercial operators are also the beneficiaries of other people deciding to avoid the zone as they will benefit from reduced congestion and more reliable journey times. It should also be noted that these increases would not automatically take place every year with TfL and the Mayor needing to follow the same procedure to implement a routine increase to the charge level as applies now except that there would not be a consultation (for example, TfL would need to make a variation order and prepare an EqIA and the Mayor would need to make a decision whether to confirm the increase). Smaller incremental increases instead of occasional larger increases are expected to allow businesses to plan better.*

5.3.40 AICES also stated that we should provide multi-year clarity and certainty on charge levels to help with business forward-planning. Annual adjustments would create significant financial uncertainty and could deter further investment in zero-emission technology. **Our response:** *Part of the rationale for proposing a revision to the Mayoral Guidance is to align future routine charge increases with annual increases to Tube and TfL railway passenger fares, which are usually implemented in March every year, with an announcement in the preceding December. The inflation indicator we propose to use is the Retail Prices Index annual rate for July plus one per cent which is the rate that is typically used to calculate railway fares. This means that the guidance has given an upper limit which provides an indication of the level of routine charge increases, should they be implemented. We would anticipate following a similar timetable, but it is not specified as part of this consultation. We are required to give sufficient notice to customers of any changes. Providing a fixed timetable on the level and timing of future routine charge increases is not appropriate given the objectives of the scheme and the need to develop proposals which are appropriate for the circumstances at the time. This revised procedure would also enable smaller incremental increases to be made instead of larger, more infrequent increases which is expected to allow businesses to plan better.*

5.3.41 Westminster City Council supported the change to enable inflationary increases but think people need time to consider and respond to changes, so did not support the proposal for shorter consultation periods or the proposal not to consult on other routine changes. London TravelWatch stated that six weeks is the absolute minimum and that TfL should extend this when proposals are more significant. Additionally, IDAG noted that shorter consultation periods could present a barrier for disabled people, who may require additional time to read and respond to consultations. **Our response:** *While we understand the concern about people having enough time and information to consider proposals, we also know that it can be burdensome for people to be notified about multiple consultations on relatively minor issues. See response to 211, 215 and 217 above. The facility to read and respond to consultations online typically reduces the time required albeit we still seek to provide information in multiple formats including accessible formats and report summaries, so that people can choose what type of information best suits them. This also means the information is available for those not able to participate online. We are committed to continuing this in future.*

The removal of the expectation that we would consult would only apply in respect of routine changes as described in 211. Furthermore, Schedule 23 gives the Mayor the option to consult or to require TfL to do so separate from the procedure set

out in the Mayoral Guidance. The Mayor will be asked to consider whether consultation is required when deciding whether or not to confirm routine changes.

5.3.42 Elly Baker AM was concerned that these changes would undermine public trust in authorities and that this was already in decline. **Our response:** *The Mayor and TfL take the issue of public trust and confidence very seriously and as explained in 211, even if the changes to the Mayoral Guidance are adopted, we would continue to undertake public consultations on minor and major variations to the scheme and would determine the length of the consultation period based on the specific circumstances. We consulted on a change which would enable us to make very specific changes of a routine nature without consultation. This is akin to the process for setting TfL Tube and rail fares, which are not consulted on. Additionally, a decision document and EqlA would support the making of the increase (both of which would be published) and we would continue to publicise any changes of this nature so that Londoners are aware of the decision and how it was taken.*

5.4 Comments on specific impacts

5.4.1 This section contains summaries of the comments that were received in relation to the impacts of the proposals. It is split into three tables with associated stakeholder commentary at the end of the section. The first table contains the wider impacts of the proposals, the second covers the financial and economic impacts, and the third is the social impacts of the proposals.

Wider impacts (including traffic and environment impacts)

5.4.2 Table 5-8 provides a summary of the comments that were received around the wider impacts (including environment impacts) of the proposals. Please see also the updated IIA, especially section 7 and section 9.

Table 5-8: Responses to issues raised on the wider impacts of the proposals (including traffic and environmental impacts)

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
330	Package of proposals will have no impact on congestion/traffic levels/will not cause a reduction in the number of people travelling within the CCZ	512	21	In developing the proposals, we undertook modelling of the expected impacts on travel patterns (described in detail in the IIA section 7.2), and this demonstrates that the changes are likely to help to achieve our aims with regard to traffic reduction, while also bringing other benefits to London. On an average weekday during the first year of implementation, the impact of the proposals across all assessed modes during charging hours (07:00-18:00), results in a two per cent reduction in vehicles, equivalent to approximately 2,200 fewer vehicles per day, compared to a 'Do Nothing' scenario³⁴. See section 7.2 of the IIA for more details on future years and weekend traffic. Other benefits include improvements in air quality, climate change and road safety, among others. The IIA identified minor positive impacts in terms of air quality, and minor positive impacts on human health, given a minor reduction in emissions of NO_x, PM₁₀ and PM_{2.5} within the CCZ during charging hours as a result of a reduction in vehicle kilometres travelled and a change in the makeup of fuel type of vehicles, reducing harmful atmospheric pollutants in areas of poor air quality, reducing exposure to them. This reduction of vehicle kilometres and change in the proportion of EVs would also result in a minor reduction in emissions of CO₂ within the CCZ during charging hours, resulting in a minor
331	Package of proposals will have a positive impact on congestion/traffic levels/will reduce the number of people travelling within the CCZ	82	2	
332	Package of proposals will cause more congestion/traffic levels/increase it	50	3	

³⁴ Do Nothing is what would happen without further intervention – it means that the charge level remains at £15 and the CVD ends. This is the default position, since 2018 when the CVD was established. The proposals would change this, offering a new CVD and support for EV drivers for longer.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				positive impact on Climate Change. Finally, the IIA also identified a minor positive impact on road safety in the CCZ due to reductions in traffic. Other benefits have been identified in the IIA.
333	Package of proposals will have no impact to air quality/emissions	132	1	See response 330. As set out in section 9.3.1 of the IIA, the proposals when compared to a 'Do Nothing' scenario demonstrate a reduction in all key pollutants in each assessed year within the CCZ. Annual NO_x emissions during charging hours coming from the relevant vehicle types show a decrease by 2.7 per cent in the first year of the proposals, 2.6 per cent in 2030 and 2.4 per cent in 2035. Annual PM₁₀ emissions during charging hours coming from the relevant vehicle types show a decrease by 1.8 per cent in the first year of the proposals, by 1.9 per cent in 2030 and 1.0 per cent in 2035. Annual PM_{2.5} emissions during charging hours coming from the relevant vehicle types show a decrease by 1.8 per cent in the first year of the proposals, by 1.9 per cent in 2030 and 1.0 per cent in 2035. Annual CO₂ emissions during charging hours coming from the relevant vehicle types show a decrease by 2.5 per cent in the first year of the proposals, by 2.6 per cent in 2030 and 2.6 per cent in 2035.
334	Package of proposals will have a positive impact on air quality/emissions/will improve it	60	3	
335	Package of proposals will make air quality/emissions/pollution worse	56	20	
336	Package of proposals will have no impact to noise pollution	2	0	The IIA (section 9.3) stated that the forecast changes in traffic are unlikely to be perceptible in terms of noise.
337	Proposals will have a positive impact on noise pollution/reduce it	9	0	
338	Package of proposals will make noise pollution worse/create more noise	1	0	

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
339	Package of proposals will have no impact on safety	6	1	The IIA found that overall the reductions in traffic brought about by the proposals may lead to a minor positive impact on road safety. To help ensure improvements in road safety are realised and enhanced, the IIA has recommended that we continue to seek opportunities to increase the attractiveness of cycling and walking and bus to promote use and reliability of these modes where appropriate, and further increase potential for people to travel using active modes in a safe environment. See section 10.3.1.2 of the IIA for more information.
340	Proposals will have a positive impact on safety issues/improve safety	25	2	
341	Package of proposals will make safety issues worse	13	1	
342	Concern Congestion Charge just pushes/will just push congestion and pollution outside of the zone	70	7	Monitoring of the impacts of the Congestion Charging scheme has not shown this to be the case: traffic congestion did not increase on the inner ring road or key radial routes as a consequence of the Congestion Charging scheme. ³⁵ Incentivising more people to walk, cycle or use public transport for trips has wider benefits for areas and the times outside of the Congestion Charging scheme. We will continue to monitor traffic levels and pollution in London.
343	Concern Congestion Charge will push people out of London/cause people to move away/relocate	66	1	The CCZ, at 21km ² constitutes a very small part of London and there are ample alternatives to driving within and around it. The overwhelming majority of trips are made by walking, cycling or public transport. The Congestion Charging scheme has been in place since 2003. There is no evidence that the Congestion Charge leads to this impact.

³⁵ <https://tfl.gov.uk/cdn/static/cms/documents/impacts-monitoring-report-2.pdf>

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
153	Concern Residents' Discount will impact desirability of living in central London/dissuade people from buying/impact property prices	14	0	See response 343. There is no expected impact of this kind. In order to mitigate the impact of the changes to the discount on residents, we are proposing that those residents that have registered for the discount before March 2027 would retain their discount regardless of their vehicle's fuel type, now and in the future. Following feedback during consultation, we are now recommending that there is an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030. We are also recommending a specific new 100 per cent discount for back to base car club EVs based in bays in the CCZ. These two modifications are recommended as mitigations to the proposed changes to the Residents' Discount.
344	Concern about negative impact of EVs on congestion/air quality/emissions	85	2	See response 330 and 333. In addition, a recent report published by the GLA and TfL in partnership with EIT Urban Mobility³⁶, conducted by e:misia, shows that EVs have an overall positive impact from an air quality perspective. EVs do not directly produce NO_x or CO₂ emissions and increases in PM₁₀ or PM_{2.5} emissions from tyre wear or road

³⁶ [Study on non-exhaust emissions \(NEE\) in road transport - EIT Urban Mobility](#)

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				abrasion are offset by decreases in those pollutants as a result of regenerative braking and elimination of exhaust emissions.
345	Concern about the impact on those who can't use public transport/active travel/are reliant on using cars/taxis (e.g. for work, due to health issues/disabilities, public transport not viable)	564	31	The IIA assessed these potential impacts (section 10.3). While the majority of trips in the CCZ are by public transport, walking or cycling, there are mitigations within the Congestion Charging scheme for people who may need to use a car, such as Discounts and Exemptions and reimbursements. These include a 100 per cent discount for vehicles with nine+ seats, the 100 per cent Blue Badge discount, exemption for vehicles in the disabled tax class and Residents' Discount. All London taxis, and PHVs designated as wheelchair-accessible are exempt from the Congestion Charge when undertaking a booking, and the Taxicard scheme provides reduced taxi and PHV fares for eligible members. The IIA noted the continued importance of promoting these and for us to continue to take actions to ensure public transport is accessible. Those with EVs will benefit from the proposed new CVD compared to a 'Do Nothing' scenario. However, the IIA recognised that some people may be reliant on travel by private modes, including PHVs and cars, for travel in the CCZ and may be negatively impacted by the proposals, particularly older people, disabled people and people on lower incomes not eligible for existing discounts and exemptions due to the proposed charge level increase (and subsequent potential impacts on PHV fares and availability) and proposed changes to the Residents' Discount (if existing or future residents are not registered prior to March 2027).

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				As set out in Section 2.5, we are recommending two modifications to be made as mitigations to the proposed changes to the Residents' Discount to help minimise the scale of the impact of this element of our proposals on CCZ residents.
346	Concern proposals will encourage use of petrol/diesel cars/slow down transition to EVs	94	37	See response 113.

Financial and economic impacts

5.4.3 Table 5-9 provides a summary of the comments that were received around the financial and economic impacts of the proposals. Please see also the updated IIA section 8.3.

Table 5-9: Responses to issues raised on the financial and economic impacts of the proposals

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
270	Concern package of proposals will have a negative impact on local residents	141	7	Residents of the CCZ live in an area with very high levels of public transport accessibility, good access to active modes, and lower availability of on and off-street parking. As the IIA highlights (section 6.4.2), the most common mode of travel by residents in the CCZ is walking, followed by bus. Only 21 per cent of CCZ residents travel by car (as a driver or passenger) at least once per week, almost three quarters do not have access to a car in their household, and only six per cent commute to work by private

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				modes (IIA section 8.3.1). In addition, local residents will benefit from minor reductions in traffic due to our proposals, traffic, and subsequent minor improvements in air quality, road safety, and journey reliability in the CCZ by bus or private vehicle where travel by private modes is required. However, it is recognised that some local residents may be reliant on a private vehicle for some trips. As such, since the Congestion Charging scheme launched in 2003 we have provided residents of the CCZ with a 90 per cent discount to the charge. This is limited to one vehicle per household. To mitigate the impact of the changes to the Residents' Discount on existing residents who may own a vehicle in the expectation that this long-standing discount would remain in place, residents who have registered for the Residents' Discount prior to 1 March 2027 would retain their discount regardless of their vehicle's fuel type, now and in the future. These 'grandparent rights' would apply provided that the resident continues to meet the discount's other eligibility criteria and timely renewals are made. Following feedback during consultation, we are also recommending that there is an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030. We are also recommending a specific new 100 per cent discount for back to base car club EVs based in bays in the CCZ. These two modifications are recommended as mitigations to the proposed changes to the Residents' Discount.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				Residents with a Blue Badge will continue to receive a 100 per cent discount, and those with a vehicle in the disabled tax class will continue to be exempt.
271	Concern package of proposals will have a negative impact on my business/livelihood	63	6	The charge level was last changed in 2020 when it increased on a temporary basis from £11.50 to £15 in response to the challenges of the pandemic, and then permanently increased to £15 in 2022. Previous changes included an increase in 2014 from £10 to £11.50, in 2011 from £8 to £10 and in 2005 from £5 to £8. In the period since the last charge level increase, the financial effect of the charge in terms of its deterrent effect has eroded in the context of wider inflation and an increase is necessary to maintain the effectiveness of the scheme. It is also important to ensure that taking public transport does not become relatively less attractive due to fares increasing more, or at a greater rate, than the Congestion Charge. We consider that the proposed increase is necessary to maintain the effectiveness of the scheme as a deterrent to driving in central London, in the context of wider inflation
272	Concern package of proposals will have a negative impact on small businesses/sole traders/tradespeople	226	26	
273	Concern package of proposals will have negative impact on businesses/operations in London (general comments)	202	26	The IIA (section 8) identified the overall potential effect of the proposals on businesses/operations in London as neutral. There is a potential minor positive impact on businesses across all vehicle types due to the benefits of reductions in traffic in the CCZ which could lead to increased productivity. There is also a small financial benefit to drivers and operators using EVs compared to the

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				current situation without the proposals (end of CVD) which could lead to a positive impact on livelihood. The IIA identified minor negative impacts on small businesses who are reliant on freight services and small operators in the PHV sector who do not currently operate EVs and are not planning to switch to EVs. However, the proposed charge increase is a below inflation level increase for the period since the charge was last changed (2020), and most businesses are likely to be able to absorb the below inflation cost increase or to pass on the charge to customers. Due to the scale of the charge level increase, it is not expected that the proposals will have a significant negative impact on livelihood.
274	Concern package of proposals will have negative impact on London's economy/tourism/number of visitors	225	10	As set out in the IIA, the estimated total cost of congestion to London as a city is between £3.85 billion³⁷ and £4.9 billion³⁸ a year. As drivers in London spent 101 hours in traffic, each hour reduction could save drivers and London £9.33 per hour³⁹. The proposals are estimated to reduce traffic vehicle numbers by circa two per cent which has the potential to lead to a minor reduction in traffic delays and minor improvements to journey reliability, which may translate into time savings and therefore would have a minor positive impact for London's economy. The cost increase of the proposals is considered to be minor in the context of the total economic output of the Central Activities Zones (CAZ), of which

³⁷ [INRIX \(2024\) Global Traffic Scorecard: London most congested city in Europe; congestion costing the UK £7.7 billion.](#)

³⁸ [TfL \(2023\), Press Release: Congestion Charge marks 20 years of keeping London moving sustainably](#)

³⁹ [INRIX \(2024\) Global Traffic Scorecard: London most congested city in Europe; congestion costing the UK £7.7 billion.](#)

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				the CCZ is a major part, which is approximately £150 billion per year⁴⁰. The scale of impact across London's economy is expected to be low compared to the economic activity of the CCZ. This means that the impact on supply chains, businesses and the employment within the CCZ and for the wider London economy is also likely to be low. The impact on London's economy, tourism and visitors due to increased costs to customers as a result of the proposals is likely to be minimal given the scale of the cost increase. The IIA also identified positive impacts on social and leisure activities and tourism, as reductions in traffic and emissions have the potential to make the CCZ more attractive and increase active travel in the zone.
275	Concern that Congestion Charge costs will be/are being passed onto residents/customers from businesses/services (e.g. through taxi fares, cost of goods)	176	23	It is for businesses to determine how they respond to the charge. The IIA has identified that it is likely that businesses will pass on the increased charge to their customers as this has been the case since the Congestion Charging scheme was implemented. It is expected that some (larger) businesses may be able to absorb the charge increase without increasing costs to the customers. Taxis are exempt from the Congestion Charge, however PHVs are not and may pass on the charge to customers as many of the large operators have done since the exemption for PHVs was removed in 2018.

⁴⁰ [Arup \(2021\), The economic future of the Central Activities Zone \(CAZ\)](#)

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
276	Concern about the cumulative financial impact of charges/charge increases from multiple schemes (e.g. ULEZ, Silvertown and Blackwall tunnels, other crossings and schemes)	138	11	The Congestion Charge operates in the central one per cent of London. The large majority of trips to the zone are undertaken by active and sustainable modes, but some of these trips may require the use of private vehicles for accessibility reasons, or where the journey purpose necessitates use of vehicle (such as freight and servicing). The Low Emission Zone (LEZ), Ultra Low Emission Zone (ULEZ), and the Silvertown and Blackwall tunnels user charges may apply to these trips. However, compliance with the LEZ and ULEZ is very high, at 97.5 per cent for LEZ (March 2024) and 96.7 per cent for ULEZ (September 2024)⁴¹, meaning no charge is payable. Where all or a multiple of the charges are required to be paid for travel in London, this may negatively impact these users. However, this is considered to be an exceptionally small proportion of trips. EVs are compliant with both LEZ and ULEZ, and drivers of EVs will benefit from the proposed new CVD. Drivers who were not eligible for the new CVD are also likely to have a LEZ/ULEZ compliant vehicle when driving into the CCZ due to the high compliance levels.

⁴¹ ULEZ one year report: <https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/environment-and-climate-change-publications/london-wide-ultra-low-emission-zone-one-year-report>

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				The Silvertown and Blackwall tunnels are located approximately five kilometres east of the CCZ, and alternative, uncharged routes provide more direct access into the CCZ for people travelling cross-river from the east of London, including Rotherhithe Tunnel and Tower Bridge. Nevertheless, those who pay to use the tunnels en route to entering the CCZ benefit from the improvements in journey times associated with the user charges, which have been implemented to effectively manage demand. Across all schemes, mitigations are in place to help support people who may require use of a private vehicle to travel in London, including people who may face barriers on our public transport network. This includes a 100 per cent discount for Blue Badge (which can be applied to up to two nominated vehicles) in respect of the Congestion Charge and the Silvertown and Blackwall tunnels user charges, and an exemption for vehicles in the disabled tax class on both schemes (and a grace period on ULEZ to 2027). Eligible Londoners, businesses and charities were supported through ULEZ to switch to compliant vehicles through our Scrappage Scheme, and low-income residents in east and southeast London on low incomes may be eligible for a 50 per cent discount on the tunnel user charges for at least three years, meaning at most times of the day they will pay 75p per crossing.
277	Concern about proposed increase to charge level/changes to discounts	241	11	We recognise that the proposals are being introduced during a time where people are experiencing increased costs. The large majority of people who travel into the CCZ do so using active and

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	during cost of living crisis/pressures			sustainable modes, meaning they avoid the charge. However, for some, driving within the zone is a necessity. The MTS states in Proposal 20 that we will keep the Congestion Charge under review, and from time to time we consult on changes to ensure it remains effective in its objectives and those of the MTS. Please see responses 21 – 23 regarding the reason for the proposed charge level increase. Our IIA has considered the impact of the proposals on people and businesses that may be impacted. Please see responses 270 – 273.
278	Concern package of proposals will have negative impact on those struggling financially/on lower incomes/essential/key workers (e.g. debt)	238	8	See response 277. To mitigate the impact on existing residents who may own a vehicle in the expectation that this long-standing discount would remain in place, residents who have registered for the Residents' Discount prior to 1 March 2027 would retain their discount regardless of their vehicle's fuel type, now and in the future. These 'grandparent rights' would apply to residents who have been registered for the discount before 1 March 2027, provided that the discount's other eligibility criteria continue to be met and timely renewals are made. The recommended 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

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				reduce the impact on residents who move into the zone that may be struggling financially and less able to afford an EV. The recommended new 100 per cent discount for back to base car club EVs in the CCZ would also act as a mitigation for impacts on low-income residents. Our IIA has considered the impact of the proposals on people who may be financially impacted, as well as key workers such as carers who may require a vehicle for travel. While the large majority of people travelling in the CCZ do so by active and sustainable modes, there could be minor negative impacts on some low-income workers who do not have the charge covered by their employer, or are unable to pass to charge onto customers. Those travelling in the CCZ with an EV will benefit from the proposed new CVD compared to a 'Do Nothing' scenario where the CVD ends. We have proposed two modifications to our proposals to help mitigate the potential impacts on residents of the CCZ who may be less able to afford or access an EV but may require a vehicle to travel as a resident of the CCZ, as set out in section 2.5.
279	Concern proposed increase to charge level will have negative impact on those struggling financially/on lower incomes/essential/key workers (e.g. debt)	231	3	Please refer to 278.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
280	Concern proposals to discounts will have negative impact on those struggling financially/on lower incomes/essential/key workers (e.g. debt)	33	6	Please refer to 278.

Social impacts

5.4.4 Table 5-10 provides a summary of the comments that were received around the social impacts of the proposals. Please see also section 10 of the updated IIA.

Table 5-10: Responses to issues raised on the social impacts of the proposals

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
300	Concern package of proposals will negatively impact on social/leisure activities	69	0	The IIA considered the impact of our proposals on access to social and leisure activities, particularly for those that may require travel by private modes. It noted the range of free or discounted transport concessions that we offer to groups such as older and younger Londoners and eligible disabled people, as well as Congestion Charge discounts and exemptions. These include discounts available for vehicles with nine+ seats, the 100 per cent Blue Badge discount and our Dial-a-Ride service in addition to the Taxicard scheme. It identified minor positive impacts on social and leisure activities and tourism, as reductions in traffic and

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				emissions have the potential to make the CCZ more attractive and increase active travel in the zone. However, it recognised that some people may be reliant on travel by private modes for travel to social/leisure activities and may be negatively impacted by the proposals, particularly older people and disabled people not eligible for existing discounts and exemptions and on lower incomes. As set out in 278 above, we are recommending two modifications to be made as mitigations to the proposed changes to the Residents' Discount.
301	Concern package of proposals will negatively impact on faith groups (e.g. travelling to church) (general comment)	4	1	The IIA recognised that the proposed package of changes may lead to minor negative impacts on people who may require travel by private modes to religious services and facilities during charging hours where travel within or through the CCZ is required, particularly those who may be on lower incomes and face barriers to travel by active and sustainable modes (such as older people and disabled people). There are existing mitigations in place which may help support people who may require use of a private vehicle for travel to religious services. These include the exemption for vehicles in the disabled tax class, and the 100 per cent discount for Blue Badge holders which can be applied to up to two nominated vehicles per account. Some people may also be eligible for use of our Dial-a-Ride service for journeys to religious services, which is free for those eligible for the service, or be eligible for subsidised travel by taxi or PHV

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				through the Taxicard scheme. Additionally, the 100 per cent discount for vehicles with nine+ seats helps to mitigate impacts on religious service providers who provide transport services for people attending religious services and events they run. The Congestion Charge operates 07:00-18:00 Monday-Friday and 12:00-18:00 Saturday-Sunday and bank holidays – travel in the evening and on weekend mornings is uncharged. The proposed new CVD will also help support those with an EV. As described in section 2.5, we are recommending modifications which provide further mitigations to help further support residents of the CCZ who may be less able to afford or access an EV but may require a vehicle to travel to faith groups and services by private vehicle.
302	Concern proposed increase to charge level will negatively impact on faith groups (e.g. travelling to church) (general comment)	5	0	Please refer to 301.
304	Concern package of proposals will negatively impact disabled people (general comment)	42	5	As identified in our IIA, some disabled people may need to use private modes to travel due to barriers to using active and sustainable modes and may be reliant

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				on services or travel provided by people who may be impacted by the proposals. It found that the proposed charge level increase may have a minor disproportionately negative impact on disabled people. It also identified potential minor negative impacts on carers, charities, religious and community groups may disproportionately negatively impact disabled people. Both of these impacts are considered to be minor and mitigated by existing discounts and exemptions, including the exemption for vehicles with nine+ seats, the 100 per cent discount for Blue Badge holders, and NHS patient reimbursement (subject to eligibility). The potential impact of the proposed charge level increase on PHV fares and availability may disproportionately 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. Some existing residents of the CCZ registering for the Residents' Discount after the proposals come into effect on 1 March 2027 may experience a change in

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				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 is particularly due to the potential inaccessibility of EV charging infrastructure for some disabled people. However, the 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 reduce the impact on disabled people. Disabled people may experience a minor disproportionately positive impact due to reductions in traffic and consequent improvements in air quality, road safety and noise in the CCZ.
305	Concern proposed increase to charge level will negatively impact disabled people (general comment)	22	2	Please refer to 304.
306	Concern proposals to discounts will negatively impact disabled people (general comment)	14	1	
307	Concern package of proposals will negatively impact elderly people (general comment)	46	2	As identified in our IIA, some older people may be reliant on travel by private vehicle and therefore experience minor negative impacts resulting from the proposed charge level increase.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				Additionally, they may face barriers to using or owning an EV, which may mean they are disproportionately impacted by the proposed change to the Residents' Discount (if not registered prior to 1 March 2027) and may not be able to have the benefit from the proposed new EV discount. However, following feedback received during consultation, the 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 reduce the impact on older people. While this will not be available to older people applying after 2030, the impact will be further reduced at this time due to increases in the availability and affordability of EVs, and potential further improvements in charge points. Additionally, there are a number of existing mitigations in the scheme which may help to minimise the impact. This includes the 100 per cent discount for Blue Badge holders, exemption for vehicles in the disabled tax class, Residents' Discount (for existing residents of the CCZ registered before the proposals come into effect), and NHS patient reimbursement (subject to eligibility). Identified potential minor negative impacts on carers, charities, religious and community groups may disproportionately negatively impact older people. This impact is considered to be minor and mitigated by existing discounts and exemptions, including the

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				exemption for vehicles with nine+ seats, the 100 per cent discount for Blue Badge holders, and NHS staff and patient reimbursements (subject to eligibility). 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. Finally, older people may experience minor positive impacts due to reductions in traffic and consequent improvements in air quality and road safety.
308	Concern proposed increase to charge level will negatively impact elderly people (general comment)	19	1	Please refer to 307.
309	Concern proposed changes to discounts will negatively impact elderly people (general comment)	6	1	Please refer to 307.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
310	Concern package of proposals will negatively impact vulnerable people (general comment)	17	2	Our IIA identified potential minor negative impacts for vulnerable groups, including homeless people, asylum seekers and refugees, and people on low incomes. For our response in relation to impacts on older people and disabled people please refer to 307 and 304 respectively.
311	Concern proposed increase to charge level will negatively impact vulnerable people (general comment)	8	1	Identified potential minor negative impacts on charities and community groups resultant of the proposed charge level increase may negatively impact homeless people, asylum seekers and refugees and people on low incomes. This impact is considered to be minor, and those providing these services with an EV will benefit from the proposed new CVD, including a higher discount for electric vans.
312	Concern proposed changes to discounts will negatively impact vulnerable people (general comment)	13	0	People on low incomes who are required to travel by private modes in the CCZ may also be negatively impacted by the proposed charge level increase. However, people on low incomes are less likely to own a car and less likely to make journeys to the CCZ by private modes than people on higher incomes. A minor negative impact was identified for people on low incomes who are not registered for the Residents' Discount or move into (or are housed in) the CCZ after

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				the proposal comes into effect, and require use of a private non-EV. As set out in 278 above, we are recommending two modifications to be made as mitigations to the proposed changes to the Residents' Discount on low-income residents, which will help to further reduce the impact on people on low incomes.
313	Concern package of proposals will have a negative impact on those with protected characteristics (not captured elsewhere in code frame) (general comment)	8	1	Our IIA has considered the impact of our proposals on people who share a protected characteristic and those who may be disadvantaged in London including people on low incomes, carers, homeless people and asylum seekers and refugees. Our response to impacts on disabled people, older people and on faith and religion are given earlier in this table, as is our response in relation to impacts on disadvantaged and vulnerable groups. Due to the demographics of the PHV industry in London, the proposed charge level increase may have a minor disproportionate negative impact on Black, Asian and minority ethnic and Muslim men where drivers are required to pay the Congestion Charge and this is not passed onto passengers or absorbed by the operator. The impact is considered to be minor as it is likely that only a small proportion of drivers will operate primarily in the CCZ during charging hours and be

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				unable to pass the charge onto customers or have it covered by the operator/employer. Similarly, the proposed charge level increase may have a minor disproportionate negative impact on Black, Asian and minority ethnic women where carers are required to pay the Congestion Charge themselves and it is not covered by their employer (or they are an unpaid carer). While there are a number of minor negative impacts identified due to the proposals, we have sought to provide mitigations (existing or proposed) to help reduce the scale of these impacts. There are also positive impacts which are considered to justify continuing with our proposals, including the provision of a new CVD for drivers with an EV, and potential positive impacts resulting from reductions in traffic with subsequent minor positive impacts on road safety and air quality in the CCZ when compared to a 'Do Nothing' scenario. As set out in 278 above, we are recommending two modifications to be made as further mitigations to the proposed changes to the Residents' Discount.
314	Concern proposed increase to charge level will have a negative impact on those with protected characteristics (not captured elsewhere in code frame) (general comment)	2	0	Please refer to 313.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
315	Concern proposed changes to discounts will have a negative impact on those with protected characteristics (not captured elsewhere in code frame) (general comment)	1	1	
316	Package of proposals will have a positive impact on those with protected characteristics. We received other comments on the positive impact on those with protected characteristics which we have noted. Comments included: - Maintaining discount for residents (grandparent rights) will help protecting vulnerable users such as pensioners - Continuing a discount for electric cars will support disabled people who can't use public transport - Proposals support children's health given obesity crises	7	0	We have noted these comments.
317	Concern package of proposals will have other social impact (e.g. impact on charities/charity work)	9	4	Section 10.3 of the IIA considers these impacts.
606	Reference to people with protected characteristics (e.g. age, disability, gender, ethnicity, religion)	154	5	Please see other responses in this table and the updated IIA

Other stakeholder comments

- 5.4.5 We have noted these additional comments from stakeholders that are not included in the tables above.
- 5.4.6 AICES and BVRLA have raised concerns that businesses are forced to retain their diesel vehicle or return to diesel because the new proposed CVD makes it unaffordable to switch to electric. This is in addition to the operational constraints of electric vans. **Our response:** *In deciding whether or not to switch to (or retain) EVs, businesses will need to consider a number of factors related to vehicle purchase and running costs, and their individual circumstances. The Congestion Charge and the CVD is a factor for businesses which operate a chargeable vehicle in central London, but it is one factor among many. We recognise that it remains important to provide an incentive to use the cleanest possible vehicles and for this reason we are proposing a new CVD, at a higher rate for vans and HGVs; however, we must balance this with the primary objective of the Congestion Charging scheme which is to manage traffic and congestion. A 'green' discount has been in place since the scheme began in 2003 and has been a contributing factor in the uptake of EVs in London and we will continue to support this shift via other measures such as supporting the rollout of EV charging infrastructure. There are more than 25,509 public charging points across London⁴² which means that the EV infrastructure network in London has grown by over 500 per cent since 2019⁴³ and that we are broadly on track to have more than 40,000 charge points by 2030.*
- 5.4.7 CoMoUK, LB Hackney, LB Hounslow, LB Islington, LB Waltham Forest and Zipcar have raised concerns that the proposals will impact the viability of (electric) car clubs which could limit residents' access to electric car club vehicles and could increase private car ownership and congestion. **Our response:** *We are now proposing a specific new 100 per cent discount for back to base car clubs EVs based in the CCZ. Please see section 2.5 for details on this mitigation.*
- 5.4.8 GMB has 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. **Our response:** *The impact on care workers and charity volunteers and people on low incomes were assessed in the IIA pre-consultation and identified as minor negative. Based on*

⁴² <https://lruc.content.tfl.gov.uk/electric-vehicle-infrastructure-strategy-2025.pdf>

⁴³ <https://www.gov.uk/government/collections/electric-vehicle-charging-infrastructure-statistics>

consultation, we have now added an assessment of the impacts on NHS staff to the IIA in section 10.3.3.2 and this impact is identified as neutral.

- 5.4.9 BusinessLDN is concerned that the proposals, including the charge level increase and the new CVD, will have negative impacts on PHVs entering the zone, compared to other commercial vehicles. GMB are concerned that the proposals will have a negative impact on service levels, quality and reliability, as commercial fleet operators need to adjust to the new cost burden and EV PHV drivers may not be willing to enter the CCZ anymore. GMB stated that black cabs are an inadequate alternative for disabled people as they are too expensive. ***Our response:*** *The IIA identified the overall potential effect on business/operations in London as neutral. It identified minor negative impacts on small businesses who are reliant on freight services and small environment operators in the PHV sector who do not currently operate EVs and are not planning to switch to EVs. Due to the scale of the charge level increase (below inflation) and the introduction of the new CVD, it is not expected that the proposals will have a significant negative impact on service levels, quality and reliability or the availability of PHVs in the CCZ. PHV drivers using PHVs designated as wheelchair accessible vehicles (WAV) are exempt from the Congestion Charge if they are carrying out a private hire booking. Black cabs also offer an adequate alternative for disabled people as they are always wheelchair accessible, can be hailed as needed and cannot refuse bookings. In addition, unlike PHV fares where PHV operators have the flexibility to set their own fares based on demand and add surcharges for trips in central London or journeys undertaken in an EV, taxi fares are set and transparent.*
- 5.4.10 Bolt has raised concerns that the new proposed CVD may impact modal shift especially in outer London, as shared services help people to switch away from private car ownership and use and complements public transport. ***Our response:*** *The MTS recognises the increasing role of car-sharing services where these are managed in a way which enables people to move away from private car ownership in circumstances where public transport is harder to provide or for people not able to walk or cycle. There remain risks associated with increased congestion and emissions if these services are not managed, and private cars are an inefficient use of road space. The current proposals relate only to central London and would not be expected to have noticeable impacts at a London-wide level: as set out in the Supplementary Information, the package of proposals is expected to achieve a two per cent reduction in traffic on an average weekday in 2026.*
- 5.4.11 Uber states that in not assessing the proposed new CVD against present day conditions, a full picture of the disproportionate impact that the ‘Do Nothing’ scenario will have on PHV drivers from Black, Asian and minority ethnic backgrounds and of Muslim faith cannot be formed. TfL’s public sector equality duty is an ongoing duty and the future and ongoing negative

consequences that the withdrawal of the 100 per cent CVD have for equality of opportunity needs to be considered. **Our response:** *The IIA has specifically assessed the potential impacts of the proposals on PHV drivers as it recognises the demographics of the industry and how the CCZ is a primary place of work for some drivers meaning they pay (or will pay) the charge regularly. The IIA considered the impact of the proposals on PHV drivers taking into consideration the demographics of drivers under the People assessment, further expanding on the impacts discussed in the Economy section of the IIA which focused on the industry more broadly. It identifies that while PHV drivers with an EV will benefit from the proposed new CVD when compared to a do-nothing scenario, a minor negative impact may be experienced by PHV drivers without an EV due to the proposed charge level increase if they are unable to pass the charge onto customers or the operator does not cover the cost of the Congestion Charge. This minor negative impact is restated when considering the impacts based on individual protected characteristics of race, religion and belief, and sex.*

The IIA identified that the proposed new CVD will benefit PHV drivers with EVs compared to the 'Do Nothing' scenario due to the discounted charge, and while around 27 per cent of PHVs are currently electric, this number is increasing as evidenced by licensing data. This is evident in the high proportion of PHVs observed in the CCZ: 32 per cent of all PHVs observed in the CCZ were electric in September 2024. However, as identified in the IIA, the proposed charge level increase has the potential to lead to minor negative impacts on the currently circa 70 per cent of PHV drivers who do not drive an EV and some of whom may be unable to pass the charge on to passengers or have the charge covered by the operator. This impact is recognised in the context of the demographics of the PHV industry in London where, as noted, circa 90 per cent of PHV drivers are from Black, Asian and minority ethnic backgrounds, and a high proportion are of Muslim faith. It also identifies that a notable proportion (almost 30 per cent) of drivers in London based on available data are on low incomes.

The IIA recognises that while PHV operators may be able to pass on the charge to customers, as some have done since the PHV exemption was removed in 2018, this will, to some extent, be determined by the business model relevant to an individual's working arrangement. Our data shows that most PHV drivers work with one or multiple of the four largest operators, meaning most PHV drivers are likely to be able to spread the increased costs over multiple trips or to pass the increased costs to their customer. However, if the PHV driver does not own their PHV, then the owner (PHV operator or fleet owner) will pay the increased charge, although they may pass the increased charges on to customers, drivers or both. This means that drivers who do not own their PHV may still be impacted through increased charges from the PHV owner.

PHV drivers who mainly work in the CCZ (particularly those who can apply a surcharge for trips into central London) are likely to be more able to spread the cost over multiple central London trips than those working predominantly outside of the CCZ and incurring the charge infrequently. This impact which may be experienced differentially by female PHV drivers who, while only making up a very small proportion of drivers, may be more likely than men to be working part-time.

While the new CVD does not provide as high a discount as the current CVD, as we explain in paragraph 5.3.8, reintroducing a discount of 100 per cent was not considered to be a reasonable alternative as it was not compatible with the scheme's objectives. Compared to a 'Do Nothing' scenario, the proposed new CVD provides a financial benefit to the growing proportion of PHV drivers with EVs. We understand that some operators allow their drivers with EVs to keep the surcharge applied to trips into the CCZ, which is applied 24/7 (i.e. at all times, not only when the Congestion Charge is incurred) irrespective of the current 100 per cent CVD discount. Drivers of electric PHVs operating under this model may not benefit from our proposals to the same extent as those that do not, as they may now need to use the surcharge to cover the cost of the (discounted) Congestion Charge. However, this impact is resultant of an operator's business decision and the agreement between the operator and the driver, which we are unable to control.

Our 2018 IIA recognised the potential minor negative financial impacts from CVD ending in 2025 given a higher number of drivers (in light of increased EV use) would be eligible for the discount when it ended.

- 5.4.12 Uber has raised concerns that the IIA does not consider the disparity between a) PHV drivers who will not have the ongoing benefit of the 100 per cent CVD and who live in boroughs with average household incomes below the London average of £32,330 versus b) residents of the CCZ who will retain grandparent rights in respect of the Residents' Discount regardless of vehicle type and who live in the City of London and Westminster where the average household incomes are much higher than the London average. BusinessLDN has also stated that the proposed changes to the Residents' Discount create a disparity between residents still receiving significant discounts while commercial fleets face higher costs. **Our response:** *The IIA considers the impact on PHV drivers and operators who drive within the CCZ. See response 5.3.13 for more detail on the financial impact on drivers.*

We recognise that a higher proportion of CCZ residents and the areas surrounding it, such as Westminster, may be on higher incomes than other Londoners including PHV drivers. However, there are still areas within the CCZ where deprivation is high, including social housing estates operated by local boroughs. Additionally, within the CCZ there are people on lower

incomes (although average incomes in the CCZ are higher than in other parts of London), and people that require a private vehicle as alternative modes are not accessible, and who do not have a Blue Badge or vehicle in the disabled tax class, would be required to pay the full charge level were it not for the Residents' Discount. A relatively high discount for residents has been in place since the Congestion Charging scheme was launched and the reasons for providing it are specific to the particular circumstances of residents, namely, that they are unable to avoid the charge if they drive in the CCZ. The aim of the new CVD is to provide continuing support for the uptake of EVs in particular for those vehicle types that are slower in their transition to EVs.

5.5 Comments on alternatives and mitigations

5.5.1 Table 5-11 provides a summary of the comments that were received around potential alternatives and mitigations, as well as suggestions to improve transport. Not all of the comment directly relate to the Congestion Charging scheme or our proposal but for completeness have been reported and responded to here.

Table 5-11: Responses to issues raised on alternatives and mitigations

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
230	Package of proposals will positively impact/cause an increase in active travel (e.g. walking, cycling etc)	17	0	The comment is noted. As a result of the proposals, some people may be incentivised to switch to active travel which could lead to an increase in active travel in the CCZ. In addition, the reductions in traffic levels may make walking and cycling in the CCZ more pleasant, increase perceptions of safety and lead to minor reductions in road traffic collisions when travelling by active modes. The increase in perceptions of a safer and more pleasant environment to undertake these journeys may lead to greater uptake of these

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				modes. This may lead to small scale improvements in physical and mental health due to increased physical activity and an improved environment for walking and cycling. Overall, the IIA identified minor positive impacts on travel by active and sustainable modes. To help ensure walking and cycling infrastructure is enhanced, it is recommended that we continue to seek opportunities to increase the attractiveness of cycling and walking to promote use where appropriate, and further increase potential for people to travel using active modes in a safe environment. These recommendations may help to further expand the scale to which these minor positive impacts are experienced by people travelling in the CCZ by active and sustainable modes.
231	Suggest more encouragement/investment in active travel (walking, cycling, infrastructure, pedestrianisation)	105	7	The MTS has an objective of 80 per cent of all journeys to be made by walking, cycling or public transport by 2041. This is higher for trips within central London (95 per cent) and between central London and inner/outer London (99 per cent). We have invested and will continue to invest in measures to enable active travel, including as part of a longer journey including public transport. For example, with the boroughs, we have achieved an expansion of the strategic cycle network, which has quadrupled from 90km in 2016 to 410km by March 2025. Policies including School Streets (implemented by the boroughs), proposals to transform Oxford Street, our Travel for Life

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				programme and walking and cycling grants to make these modes more representative of London's diverse communities are all important here. Revenue raised from the Congestion Charge must be re-invested in delivering the MTS and can therefore be used to support interventions such as these.
233	Package of proposals will positively impact/cause an increase in public transport use (e.g. bus, Tube, train etc)	13	0	The proposals are expected to lead to a reduction in traffic numbers in the CCZ and it would be expected that some trips would shift to active and sustainable modes. Any net revenue received from our Road User Charging schemes must be used to further the aims of the MTS, being reinvested into running and improving London's transport network, improving public transport and making enhancements for people walking and cycling. In this way it could also be expected that there could be positive impacts on uptake of these modes. In addition, a reduction in traffic numbers could potentially lead to improved bus journey times which could also lead to positive impacts in public transport use.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				The package of proposals would allow for charge levels to be better aligned with Tube and TfL railway passenger fares thus ensuring that the cost of driving in central London remains proportionate to the cost of travelling by rail. This would support the sustainable transport mode share aim of the MTS.
234	Suggest more encouragement/investment in public transport (e.g. more affordable, more frequent, reliable, network coverage, safety improvements, etc)	360	17	A good public transport experience is one of the three key pillars of the MTS and we remain committed to continuous improvement in this area. For travel to and within the CCZ, the Elizabeth line has significantly improved journey times and transport accessibility. We are ahead of trajectory on our target to reduce the journey time differential for people using only the step-free network and more than a third of LU stations now provide step-free access, with further feasibility work in progress at several stations. On affordability, the price of all bus and trams fares, caps and passes will be frozen at 2023 levels until March 2026. Revenue raised from the Congestion Charge must be re-invested in delivering the MTS and can therefore be used to support interventions such as these.
360	Suggest more incentives for upgrading to EVs (not captured elsewhere in code frame)	130	23	Please refer to answer 149. We are also supporting the shift towards more sustainable movement of freight through the promotion of and support for cargo bikes. They are a safe, clean and in many cases more efficient alternative to vans and other

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				light goods vehicles. In line with the actions outlined in our Cargo bike action plan, we published 'Cargo bike operations in London: a guide' in July 2024. This is the UK's first comprehensive guidance on cargo bikes, providing businesses with the tools and information to help them make the switch to cargo bikes.
365	Other specific suggestion to reduce congestion/pollution (e.g. needs to be more encouragement/investment in other green initiatives) We received other suggestions on how to reduce congestion/pollution, which we have noted. Suggestions included: - Managing kerbside space better, including parking discounts for cleaner vehicles - Set up park and ride buses and/or taxi terminals in the outskirts - Cap the number of minicabs licenced - Should pedestrianise roads/central London/Oxford street/reallocation of road space - Explore alternative congestion-reduction tools that do not punish necessary journeys/Look at other ways to reduce carbon emissions/congestion - Variable speed limits based on traffic flow	164	15	<u>Our response to 'Managing kerbside space better':</u> Working with the boroughs we will continue to review loading provision and ensure delivery and servicing facilities are designed in a way that allows streets to be attractive places in which to walk or cycle. We will also, alongside the boroughs, continue to take targeted action including using tools such as differential parking charges, implementing electric vehicle charging infrastructure, and supporting zero emission car clubs (where appropriate) to make efficient use of kerbside space. <u>Our response to 'Setting up park and ride in the outskirts':</u> We currently have no proposals to provide park and ride buses, nor does the MTS have an aim for such a service to be introduced in London.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	- Make vans/Lorries do deliveries after a certain time/night time/off-peak or consolidated deliveries - Increase the road network's capacity through new infrastructure investment (e.g. the Silvertown Tunnel, or rebuilding the Hammersmith Bridge, Blackfriars under pass, a new bridge in Rotherhithe, Putney Bridge) - Ban vehicles into the zone by days based on the end of registration plate numbers - Incentivise off-peak car use - Encourage car sharing/shared rides and create carpool lanes			<u>Our response to 'Cap the number of minicabs licensed':</u> We don't have the powers to limit minicab numbers. <u>Our response to 'Should pedestrianise more roads/reallocation of road space':</u> We will continue to seek opportunities to deliver or support boroughs to deliver further road space reallocation in central London and beyond. <u>Our response to 'Explore alternative congestion-reduction and/or emission reduction tools':</u> Alongside the Congestion Charge we are working with boroughs on the aim to deliver traffic and emission reduction measures across London. This includes our LEZ and ULEZ schemes, School Streets, Low-traffic Neighbourhoods, and improving walking and cycling infrastructure. <u>Our response to 'Variable speed limits based on traffic flow':</u> We do not propose to implement variable speed limits based on traffic flow. No roads on the TLRN have variable speed limits, which are predominately used on the National Highways motorway network.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				<u>Our response to 'Make van/lorries do deliveries at night/off-peak times':</u> All drivers seeking to avoid the Congestion charge have the option of shifting their time of travel to outside the charging hours. In London, the London Lorry Control Scheme (LLCS) is operated by London Councils. The aim of the is to minimise noise pollution by reducing disturbance from HGVs operating at night-time and weekends. It was introduced in 1985 and affects specific roads, by restricting the movement of HGVs over 18 tonnes maximum gross weight. The scheme is managed by London Councils on behalf of the London boroughs and TfL. Advances in vehicle technology over the last 40 years provide an opportunity to make amendments to the scheme in a way that need not disturb local residents, and we recognise that after-hours and night-time deliveries are important to move freight away from congested periods and to support London's 24-hour economy. We are working closely with London Councils to implement the outstanding recommendations of the 2017 review of the Scheme, including exploration of reducing the operational hours of the scheme. It is important to note, that currently nighttime deliveries are possible with an LLCS permit.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				<u>Our response to 'Increase the road network capacity through new infrastructure investment':</u> London's road network is highly constrained and delivering road infrastructure is challenging. We will continue to seek to deliver improvements to the road network to improve capacity where necessary through schemes such as the Silvertown Tunnel which opened in April 2025, and the Gallows Corner flyover refurbishment. However, more roads are not the answer to addressing congestion, and we will keep working on effective strategies to reduce congestion include investing in public transportation, encouraging active travel (walking and cycling), and encouraging mode-shift. <u>Our response to 'Ban vehicles based on plate registration numbers':</u> We do not have the powers to limit vehicles based on plate registration numbers. <u>Our response to 'Incentivise off-peak car use':</u> The rationale for the charging hours in the CCZ is that these are the times that it suffers most from persistent and high levels of congestion. This acts as a deterrent for vehicles to come into the zone during these times.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				<u>Our response to 'Encourage car sharing/carpool lanes':</u> As set out in MTS Proposal 19, we recognise the potential contribution of car sharing/car clubs to help Londoners give up their cars, when they are paired with a reduction in the availability of private parking. However, like other vehicles, they contribute to traffic and congestion and as such it is not considered appropriate that they are exempt from the Congestion Charge. Under the current proposals, there would remain an incentive for car clubs to use EVs in the Congestion Charging Zone, in the form of a new CVD from January 2026. We also recommend a specific new discount for back to base car club EVs based in bays in the CCZ. Please see section 2.5.

Other stakeholder comments

5.5.2 We have noted these additional comments from stakeholders that are not included in the tables above.

5.5.3 Campaign for Better Transport, Caroline Russell AM, City of London, London Cycling Campaign and London Living Streets suggest investigating, piloting or introducing smart road charging schemes as an alternative or in addition to a flat rate congestion charge. Campaign for Better Transport suggest that such a scheme should provide targeted support for those on low incomes, disabled drivers and carers who must drive. **Our response:** *There are no plans to introduce smart road user charging (such as distance-based or 'pay per mile') in London at this time.*

- 5.5.4 AICES, Caroline Russell AM, DHL, GMB, Institute of Couriers, Royal Mail and UPS called for more support and enhanced financial incentives for businesses to electrify vans and HGVs. DHL and UPS highlighted that HGVs face more barriers to electrification and therefore need more support than vans (vans and HGVs should be treated differently). Caroline Russell AM asked for scrappage schemes to support small businesses and to access support via GLA Green Finance Fund. **Our response:** *In addition to response 360, we are not proposing a new scrappage scheme at this time. We previously provided a scrappage scheme to support the various ULEZ expansions. The primary objective of ULEZ was to reduce pollutants from vehicles in London, hence the support to purchase cleaner vehicles by Londoners. We are not proposing this as part of these proposals, as the primary objective of the Congestion Charge is to reduce traffic and congestion in central London. The benefits to air quality and carbon are secondary and primarily derive from lower traffic volumes and the switch to sustainable and active modes that the scheme promotes. Nevertheless, we recognise the importance of supporting the switch to cleaner vehicles and use of the cleanest vehicles possible where travel is required in the CCZ and are, therefore, proposing the new CVD. HGVs and vans get the same level of discount because both face similar challenges in electrification, albeit it is acknowledged that HGVs are further behind in this transition. The current proposal balances the need to make sure electric alternatives benefit from lower charges but without incentivising large and heavy vehicles in the zone given their impact on traffic and road safety, two key goals of the MTS. Additionally, the proposals represent a greater incentive to electrification than would have been the case without the proposals, given the CVD is due to end for all vehicle types in December 2025. It is not considered appropriate to provide financial support for the proposals beyond the measures already in place and described in our responses to comments on the proposed new CVD (supporting charging infrastructure, for example).*
- 5.5.5 LB Lambeth suggests we should closely monitor EV uptake and the use of (e)-cargo bikes. **Our response:** *We constantly monitor EVs and cargo bikes in central London and London-wide. We are now seeing an average of 16,589 unique EVs in the zone⁴⁴ during weekday charging hours, out of a total average of 105,168 cars, PHVs and LGVs (15.8 per cent). This is*

⁴⁴ On an average weekday in September 2024. Average figures during weekend charging hours for September 2024 are: 5,469 electric cars (excluding PHVs), 4,943 electric PHVs and 543 electric vans, out of 10,955 total EVs and 67,433 vehicles in total. The weekend figures were not given in the first versions of the consultation documents and were updated in our consultation portal; additionally, the weekday average of unique EVs has been updated from 16,568 and the word 'weekday' added for clarity.

made up of 2,193 electric vans, 7,871 electric cars (excluding PHVs) and 6,525 electric PHVs⁴⁵. The proportion of EVs inside the CCZ has increased with time, measured by the number of times each vehicle is captured by our cameras. Comparing an average day in September 2022 to an average day in September 2024, 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. For cargo bikes, we have seen increasing uptake of cargo bikes in all areas of London, with counts in central London rising from 4,546 in 2022 to 9,167 in 2024, an increase of 101.6 per cent.

- 5.5.6 UPS stated that there is no consideration for low-emission alternatives such as natural gas (CNG) and LPG⁴⁶ fleets. **Our response:** *On 25 October 2021 we tightened the eligibility criteria for the CVD so only battery electric or hydrogen fuel cell vehicles are eligible for the discount. This is considered appropriate given the development of vehicle technology and availability in recent years. With the current proposals we are keen to progress with this standard and CNG and LPG would represent a backwards step.*
- 5.5.7 The AA and The SMMT request for park and ride facilities located outside the CCZ. **Our response:** *Park and ride facilities are not part of the proposals at this time.*
- 5.5.8 Living Streets suggest investigating or considering the introduction of Zero Emission Zones (ZEZs). **Our response:** *The MTS envisages ZEZs to be implemented from 2020 and we have supported boroughs and BIDs in developing these locally and in 2019 we produced guidance for boroughs to help them implement Zero Emission Zones <https://tfl.gov.uk/info-for/boroughs-and-communities/zero-emission-zones>. In August 2023 we expanded the ULEZ London-wide and this has greatly improved air quality for all Londoners. Due to all phases of the ULEZ, in 2024 alone, NO_x emissions are estimated to be between 33 per cent and 39 per cent lower across all boroughs than they would have been without the ULEZ and its expansions.⁴⁷*

⁴⁵ On an average weekday in September 2024. In an earlier version of this document this was erroneously described as weekdays and weekends, which was also updated in the documents uploaded to the consultation portal.

⁴⁶ Liquefied Petroleum Gas

⁴⁷ ULEZ one year on report, p8. <https://content.tfl.gov.uk/london-wide-ulez-one-year-report.pdf>

5.5.9 Logistics UK, RHA, the SMMT and Tesco suggest an amendment to the London Lorry Control Scheme (LLSC) to allow zero emission HGVs to travel outside of the restricted hours or a better alignment between LLSC and charging hours. **Our response:** *The aim of the London Lorry Control Scheme is to minimise noise pollution by reducing disturbance from HGVs operating at night-time and weekends. It was introduced in 1985 and affects specific roads, by restricting the movement of HGVs over 18 tonnes maximum gross weight. The scheme is managed by London Councils on behalf of the London boroughs and TfL. Advances in vehicle technology over the last 40 years provide an opportunity to make amendments to the scheme in a way that need not disturb residents, and we recognise that after-hours and night-time deliveries are important to move freight away from congested periods and to support London's 24-hour economy. We are working closely with London Councils to implement the outstanding recommendations of the 2017 review of the Scheme, including exploration of reducing the operational hours of the scheme. It is important to note, that currently nighttime deliveries are possible with an LLCS permit.*

5.5.10 London Travelwatch suggested that we should advertise available discounts and alternative options such as Dial-a-Ride and the Taxicard scheme and that we also monitor the impact and consider additional support if needed. London TravelWatch also requests further consultation with disabled, young, older and religious people, people on low incomes and carers. **Our response:** *As recommended in the IIA to mitigate potential negative impacts, we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on private vehicle use including our discounts available for vehicles with nine+ seats, the 100 per cent Blue Badge discount, our Dial-a-Ride service and the Taxicard scheme, and information on our recommended modifications for the extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain means-tested benefits until March 2030 if approved. We constantly review our available discounts, exemptions and reimbursements. It is important to balance the need for some discounts and exemptions to mitigate the impacts of the scheme with the overall scheme objectives of managing traffic and congestion in London.*

During the consultation period we engaged with a wide range of stakeholders and promoted the consultation in many ways and through multiple channels both digitally and non-digitally – this is described in greater detail in Chapter 3 of this report. As part of our promotion of the consultation, we sent a newsletter to over 200 accessibility and disability groups; paid for adverts in a disability-focused magazine (Crip Life) and met with the Independent Disability Advisory Group (IDAG). Further information about our engagement is provided in Chapter 3. We have also provided a profile of respondents who took part

and choose to provide their information in Chapter 4, including their age; we found a quarter of respondents were aged 35 or under; and almost a fifth were 66 or over. Through our engagement teams, we informed stakeholders – including groups representing those with a protected characteristic and disadvantaged groups – of the consultation and offered the opportunity of a briefing should they wish; a list of stakeholders we contacted is provided in Appendix F.

5.5.11 T&E UK suggest that we should bring forward the proposed consultation on new PHV vehicle licensing requirements to give greater certainty on the direction of travel (i.e. to require battery electric only vehicles in the future) and to discourage the use of plug-in hybrid cars. **Our response:** As stated in our TPH action plan 2025, Action 14 states that we will consult with the taxi trade and private hire industry in 2025/2026 on a proposal to introduce a zero emissions (at the tailpipe) licensing requirement for taxi and PHVs in the future.

5.6 Other comments relating to the Congestion Charging scheme

5.6.1 Table 5-12, Table 5-13, Table 5-14 and Table 5-15 outline other comments made in relation to the scheme and/or proposals that are not included in the sections above. These comments have been noted.

Discounts and Exemptions

5.6.2 Table 5-12 provides a summary of the comments that were received around discounts and exemptions.

Table 5-12: Responses to issues raised on discounts and exemptions

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
170	Suggest there should be no discounts for anyone	29	0	Since its introduction in 2003, the Congestion Charging scheme has been in place to disincentivise non-essential motorised trips from being made in central London. Throughout this period a number of discounts have been available for people meeting specific eligibility criteria, which are broadly targeted at people or services who have less choice about whether to drive in the zone, are performing a public service or to incentivise the use of

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				cleaner vehicles to improve air quality, for example. It is important to balance the need for some discounts and exemptions to mitigate the impacts of the scheme with the overall scheme objectives of managing traffic and congestion in London.
171	Suggest discount for blue badge holders should continue	42	8	There is no plan to remove the 100 per cent discount for registered Blue Badge holders.
172	Suggest there should be a discount for other people with health issues/disabilities (i.e. in addition to blue badge holders)	14	3	Please see response 171. In addition to the Blue Badge discount, vehicles in the disabled tax class are exempt from the Congestion Charge.
173	Suggest there should be a discount for other specified users/groups We received other comments about the CCZ boundary which we have noted. Comments included: - A discount for specific groups, including	28	1	Please see response to 170. <u>Our response to 'A discount for specific groups':</u> No further new discounts beyond the new proposed CVD. We offer a range of free or discounted transport concessions to groups such as older and younger Londoners and eligible disabled people, as well as Congestion Charge discounts and exemptions.⁴⁸ These include discounts available for vehicles with nine+ seats, the 100 per cent Blue Badge discount, NHS staff and patient reimbursement scheme, and our Dial-a-Ride service in addition to the Taxicard scheme. Emergency service vehicles

⁴⁸ <https://tfl.gov.uk/modes/driving/discounts-and-exemptions>

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	schools, registered trades people/vehicles, delivery drivers, blue light or NHS workers. Community Transport Organisations, charities, small businesses. - A discount for taxis and buses' - A discount for areas close or contiguous to CCZ			and NHS vehicles that are exempt from vehicle tax are exempt from the Congestion Charge. We have also recommended a specific new discount for back to base car club EVs based in bays in the CCZ as an alternative for people on low incomes and certain benefits to access an EV. Given the objective of the Congestion Charging scheme we must consider very carefully how any discounts or exemptions could undermine the traffic and congestion management aims of the scheme and balance this with factors such as a lack of alternatives to driving or the social benefits of a discount or exemption. The current proposals have sought to consider the challenges faced by businesses in London (the majority of which are SMEs) when switching vans to EVs and this is reflected in the higher proposed discount level. Businesses experience the benefit of reduced traffic in the zone, and reduced running costs of EVs, as well as the proposed higher-level discount from the CC. <u>Our response to 'A discount for taxis and buses':</u> Taxis and buses are exempt from the Congestion Charge. <u>Our response to 'A discount for areas close or contiguous to CCZ':</u> While there is a limited buffer zone to the CCZ to manage the impacts of parking controls, it is not proposed to extend this or

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				the CCZ at this time. Any such change would be subject to a public consultation and an assessment of impacts.
190	Support/agree with taxis (black cabs) being exempt from charges/should not be charged	16	0	There is no proposal to remove the taxi exemption from the Congestion Charge. One key distinction between taxis and PHVs, which was central to the original policy proposal to exempt taxis but not PHVs, is that taxis are legally required to be wheelchair accessible. PHVs registered as being wheelchair accessible remain exempt from the charge if they are carrying out a private hire booking. In addition to wheelchair accessibility, taxis (but not PHVs) are required by the Conditions of Fitness which are a licensing requirement to provide a range of other accessibility features, which make them better placed to meet the needs of passengers with a range of accessibility needs and provide a door-to-door service. There are also other differences between taxis (black cabs) and PHVs, which make it justifiable to maintain the exemption for taxis. These differences include compellability, route requirements and fares policy. Another distinction between taxis and PHVs is that taxi fares are set and transparent whereas PHV operators have the flexibility to set their own fares, add surcharges for trips which start, end or pass through the CCZ or simply charge more for journeys undertaken in an EV.
191	Suggest taxis (black cabs) should not be exempt from charges/should be charged	17	0	
192	Suggest PHVs should be exempt from charges/should not be charged (non-EVs and general comment)	42	3	Following consultation, the exemption for PHVs was removed in April 2019 to ensure that the Congestion Charging scheme continued to be effective. PHVs registered as being wheelchair accessible remain exempt from the charge if they are carrying out a private hire booking, while PHV drivers and their vehicles

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
193	Support/agree with PHVs not being exempt from charges/should be charged	8	0	are also eligible for other discounts where they meet the criteria. Detailed information on the rationale for this can be found here: https://tfl.gov.uk/corporate/publications-and-reports/congestion-charge
194	Suggest taxis/PHVs (cannot determine which) should be exempt from charges/should not be charged	2	0	See responses 190 and 192.
195	Suggest taxis/PHVs (cannot determine which) should not be exempt/should be charged	6	0	See responses 191 and 192.
196	Suggest there should be exemptions/no charge for other specified types of vehicles/people. We received other comments about exemptions which we have noted. Comments included: - An exemption for specific groups, including those who are unable to use public transport but cannot qualify for a	119	11	See responses to 173, 191 and 365.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	blue badge, trades people, small businesses, freight and express delivery drivers, all supply chain traffic registered within CCZ, essential workers such as charity workers and NHS staff, those who work in central London and those who occasionally use their car. - PHV and Taxis should be treated equally - Policy should make app-based companies cover this charge, not the drivers - Club car/car sharing vehicles/EV exemption - An exemption for private automobiles/electric or hybrid vehicles/special services - More realistic delivery exemptions times for			

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	businesses. Not all at midnight-6am.			

Charging period

5.6.3 Table 5-13 provides a summary of the comments that were received around the charging period.

Table 5-13: Responses to issues raised on the charging period

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
60	Suggest charging period/hours should be extended (general comments)	15	5	We do not propose to make any changes to charging hours as part of this consultation. The current charging hours (between 07:00-18:00 on weekdays and 12:00-18:00 on weekends and Bank Holidays) were developed to address the transport challenges of central London, the achievement of the long-term aims of the MTS for sustainable and active mode share and reflect the busiest times of day on weekdays and weekends.
61	Suggest charging period/hours should be reduced (general comments)	23	0	
62	Suggest charging period should apply 24/7/all the time	19	1	In line with Proposal 20 of the MTS, we keep existing and planned road user charging schemes, including the Congestion Charge, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy. Any future changes beyond the routine changes described in the proposed changes to the Mayor's
63	Suggest charging period should only apply during	9	0	

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	peak times/when congestion is worst			guidance would be subject to public and stakeholder consultation.
64	Other comment/suggestion for charging period/days/times for Congestion Charge We received other comments about the charging period which we have noted. Comments included: - Extending charging hours to specific times (including evenings, morning on weekends and Christmas period) - Reducing charging hours for specific times (including weekends, bank holidays, early evening, specific days) - Increase to the congestion charge for peak hours only and not the full operating hours - Pricing be staggered and start at 8am not 7am for zero emission vehicles	48	9	

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
65	Congestion charge should be removed/there should be no charge at weekends	41	2	There is no proposal to remove the Congestion Charge, which continues to be effective in managing traffic and congestion in central London and in contributing to MTS objectives such as emissions reduction and enabling active, efficient and sustainable mode use. Weekend charging was first introduced in June 2020 as part of the package of temporary changes introduced at that time to address the transport challenges arising from the pandemic. We later reviewed these changes and in 2021 undertook a consultation on further changes to maintain the effectiveness of the scheme. These included a change to the weekend charging hours, from 07:00-22:00 to 12:00-18:00 (other changes to hours and other aspects were also consulted on at this time). The Mayor confirmed this proposal in MD2883 in December 2021.

Charge zone boundary

5.6.4 Table 5-14 provides a summary of the comments that were received around the CCZ boundary.

Table 5-14: Responses to issues raised on the charging zone boundary

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
80	Suggest extending the CCZ/increase the boundary	47	1	The original rationale for the boundary of the CCZ is that it encloses the area in central London that suffers most from persistent and high levels of congestion. This remains the case and there are no plans to extend the CCZ at this time. As described in Proposal 20 of the MTS we keep existing and planned road user charging schemes, including the Congestion Charge, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy.
81	Suggest reducing the CCZ/decrease the boundary	4	0	
82	Concern about confusion whether have travelled in the CCZ/should have a way to check	27	0	The technology currently used to operate and enforce the Congestion Charging scheme does not allow for drivers to check if they have been in the CCZ after travel. There are no plans to introduce such a function in the near future, although Proposal 21 in the MTS commits us to investigating the next generation of road user charging, which could include different technology and functionality. However, there is extensive signage and road marking in the cordon around the CCZ, which is also included in popular navigation applications. We encourage people to register for Auto Pay, which will ensure they pay automatically the correct amount and do not incur a PCN. This is already the most popular option for paying the charge. There is no fee to sign up for Auto Pay.
83	Other comment/suggestion on the CCZ/boundary	30	1	<u>Our response to 'Extend CCZ to include these specific areas:</u> See response 80.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	We received other comments about the CCZ boundary which we have noted. Comments included: - Extend CCZ to include these specific areas (including zone 2, West London, Tower Bridge and Euston Road, more of Southwark, areas around bridges, outer London) - Split up the CCZ in different zones - Outer London charges should be removed immediately			<u>Our response to 'Split up the CCZ in different zones':</u> There are no plans to reconsider different charges for different zones within the CCZ at the current time. <u>Our response to 'Outer London charges should be removed immediately':</u> The Congestion Charge does not operate in outer London.

Road User Charging

5.6.5 Table 5-15 provides a summary of the comments that were received around the CCZ boundary.

Table 5-15: Responses to issues raised on wider Road User Charging

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
250	Suggest Congestion Charge should focus on congestion/traffic reduction rather than air quality/pollution/emissions	85	0	The Congestion Charging scheme's objective is managing traffic and congestion, and improvements in air quality and carbon reductions are a secondary benefit which arise from lower traffic volumes and induced sustainable mode shift.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	(e.g. ULEZ should focus on air quality/pollution/emissions)			There are other schemes which focus on air quality objectives, like ULEZ and LEZ.
251	Other comment/suggestions about existing ULEZ	45	4	The ULEZ and the Congestion Charging scheme have differing objectives. The main aim of the ULEZ is to reduce harmful vehicle emissions in London, whereas the main aim of the Congestion Charging scheme is to manage traffic and congestion in central London. This consultation does not include proposals to modify the ULEZ.
252	Suggest another way for applying the Congestion Charge/road user charging (e.g. dependent on vehicle size, weight, distance travelled, emissions) We received other suggestions about how to apply the Congestion Charge which we have noted. Suggestions included: - Lower charges for outer central area and higher charges for central area - Apply the charge dependent on parameters, including emissions, vehicle size, distance travelled, engine size, weight, charge by minute, listed value of the vehicle,	165	13	There is currently no plan to change the way we apply the Congestion Charge or introduce or amend our existing road user charging schemes beyond what we have proposed as part of the proposals subject to this consultation. <u>Our response to 'Apply the charge dependent on parameters':</u> There are no plans to consider other parameters in charges or discounts at this time. See also response 117. <u>Our response to 'Ban all private cars in central London unless the owner is a council tax payer/ban visitors having cars/ more roads closed to traffic/make it a walking/cycling zone with buses/service/delivery vehicles allowed only':</u> We have noted these comments. We don't have the powers to ban cars and/or any vehicle types from the CCZ. <u>Our response to 'Use dynamic pricing - charge more during peak times, not a flat rate all day':</u> There are no plans to reconsider different charges for different times of the day within the CCZ at the current time.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	VED band, other congestion related criteria like proof of off-street parking/Pay-as-You-Drive model - Ban all private cars in central London unless the owner is a council tax payer/ban visitors having cars/More roads closed to traffic/make it a walking/cycling zone with buses/service/delivery vehicles allowed only - Use dynamic pricing - charge more during peak times, not a flat rate all day - Lower charges for outer central area and higher charges for central area - CVD for electric cars should be based on how many times they visit the zone (higher discount when less frequent) - Charges should be done by how much you earn/charge could be means-tested			<u>Our response to 'Lower charges for outer central area and higher charges for central area':</u> There are no plans to reconsider different charges for different zones within the CCZ at the current time. <u>Our response to 'CVD for electric cars should be based on how many times they visit the zone (higher discount when less frequent)':</u> There are no plans to reconsider different charges depending on the number of times vehicles visit the CCZ at the current time. <u>Our response to 'Charges should be done by how much you earn/charge could be means-tested':</u> There are no plans to reconsider different charges depending on people's income or affordability at the current time.
253	Other comment/suggestion about the Congestion Charge	84	4	<u>Our response to 'Suggestions on changing the way and to whom the charge is applied to, as well as the charge level,</u>

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	We received other comments about the Congestion Charge which we have noted. Suggestions included: - Suggestions on changing the way and to whom the charge is applied to, as well as the charge level, including the charge up to three days and having a number of free days per person - There isn't enough traffic in central London to justify this/data shows traffic reduction - Should increase incentives to EVs - Phase the charge aligned with the increase in EVs - Comments around banning unnecessary traffic/all private cars/SUVs			<u>including the charge up to three days and having a number of free days per person</u>': See responses 43, 44 and 64. There are no plans for further changes to the way the charge is applied at the current time. <u>Our response to 'There isn't enough traffic in central London to justify this/data shows traffic reduction</u>': A key aim of this package of consultation proposals is to ensure the Congestion Charge remains effective in managing future traffic levels – not just present-day traffic. EVs form a large and increasing proportion of vehicles in central London, which is expected to continue, raising the proportion of vehicles eligible for the new CVD over time. See response to stakeholders in paragraph 5.3.19 for more details. <u>Our response to 'Should increase incentives to EVs</u>': See response 360. <u>Our response to 'Phase the charge aligned with the increase in EVs</u>': See our response to 'Comments on the phased approach to discounts' in 116. <u>Our response to 'Comments around banning unnecessary traffic/all private cars</u>': We don't have the powers to ban cars and/or any type of traffic in the CCZ.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
603	Query about how funds raised through Congestion Charge/other charging schemes are used	88	6	Any net revenue received from our Road User Charging schemes must be used to further the aims of the MTS, being reinvested into running and improving London's transport network, improving public transport and making enhancements for people walking and cycling. Information is published in our Annual Report and Accounts and in the Four Year programme

Other stakeholder comments

5.6.6 We have noted these additional comments from stakeholders that are not included in the tables above.

5.6.7 BVRLA have stated that car clubs and vehicle rentals should be exempt from paying the Congestion Charge, given these trips tend to be shorter than private car trips, and that they get used only when car is the only option to travel. ***Our response:*** *As set out in MTS Proposal 19, we recognise the potential contribution of car clubs to help Londoners give up their cars, when they are paired with a reduction in the availability of private parking. However, like other vehicles, car club vehicles contribute to traffic and congestion and as such it is not considered appropriate that they are exempt from the Congestion Charge. Under the current proposals, there would remain an incentive for car clubs to use EVs in the Congestion Charging Zone, in the form of a new CVD from January 2026.*

While a 100 per cent discount for all EV car club or rental vehicles or a new car club discount for all car club vehicles (including non-EV) is not considered to be in line with the MTS and scheme objectives, we are now proposing a specific new 100 per cent discount for back to base car club bay EVs based in the CCZ. This is recommended as a mitigation to the proposed changes to the Residents' Discount for existing and future residents on low incomes who may require a vehicle to travel and for whom it may be harder to access EVs, without which they would have to pay the full user charge for travel in the CCZ within charging hours.

- 5.6.8 GMB have asked for a full exemption for London's workers - GMB London and Southern Regions. **Our response:** *It is not proposed to offer a key worker exemption, discount or similar - such a discount would be very difficult to define and would inevitably lead to calls for other similar discounts. Most importantly, a wide-ranging exemption or discount like this would undermine the main objectives of the Congestion Charging scheme.*
- 5.6.9 London Borough of Waltham Forest has stated that exemptions should only apply to Blue Badge holders, in order to drive real change. **Our response:** *A small number of discounts and exemptions are available for vehicles and customers where it is either considered important to mitigate the impact of the charge or the provision of a discount or exemption is in alignment with the objectives of the scheme and the MTS more widely. Blue Badge holders can register for a 100 per cent discount for the Congestion Charge in recognition of the fact that there are fewer alternatives to a car for these customers. In line with Proposal 20 of the MTS we keep existing and planned road user charging schemes, including the Congestion Charge, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy. At present there is no proposal to make other changes besides those recently consulted on.*
- 5.6.10 My Urban Car suggest to either give all EVs a 50 per cent CVD or charge 100 per cent on congestion charge for all vehicles but at the same time apply full ULEZ charges to all diesel vehicles (including vans) to improve air quality. **Our response:** *The primary objective of the Congestion Charge is to reduce traffic and congestion in central London, not to improve air quality. However, it also contributes to improving conditions for active, efficient and sustainable modes of travel, as well as achieving reductions in carbon emissions and improvements in air quality within the CCZ. While each of our road user charging schemes, including the Congestion Charging scheme, have their own specific objectives which are directed at the achievement of certain MTS policies and proposals, collectively they seek to address the triple challenges referred to in Proposal 24.1 of the MTS.*

Comments on the consultation (Question 22)

5.7 Comments on the consultation process

5.7.1 Questions

5.7.2 Table 5-16, Table 5-17 and Table 5-18 outline comments made in relation to the consultation. These comments have been noted.

Questions

Table 5-16: Responses to issues raised on the consultation (questions)

Code frame reference number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
400	Survey was poor quality/design/presentation (general comment)	30	1	See response to 401. The consultation was hosted on our consultation portal which aimed to provide information for people whether they had limited time and wanted a quick overview of the proposals, or if alternatively, they wished to read the background to the proposals in detail.
401	Questions were complicated/unclear/should have been clearer	49	1	See response to 404. When developing consultations, we follow best practice guidelines to ensure our activities are legally compliant, open, and honest. We hold public consultations while our proposals are at a formative stage, and in advance of a final decision being made as to how we may proceed. Through consultation we seek to listen to respondents and to understand the reasons why they may view proposals positively or negatively. The feedback we receive through consultation is used as part of our decision-making process. We designed the consultation survey to understand how the proposals would impact the community and commuters, through a range of closed questions and free-text options.

Code frame reference number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				In particular, this consultation sought feedback on the proposed new charge level, a new Cleaner Vehicle Discount and changes to the Residents Discount for future applicants; we also sought feedback on some proposed changes to the Mayoral Guidance on the exercise of our road user charging powers. We offered unlimited free-text options for respondents to provide their feedback and received more than 4,000 individual written submissions. We also ask a range of closed questions to better understand the profile of those who have engaged with us, thereby allowing greater insight into consultation findings. Our closed questions sought to better understand the profile and travel habits/intentions of the respondent. This allows our consultations to have a richer database that allows for more insightful findings. A variety of materials were provided to support the consultation. These included plain English summaries of technical documents, providing a clear explanation of what was being proposed, why the changes were being proposed, and what the proposals were forecast to achieve. An 'Easy Read' version of the consultation materials and survey was also available. If respondents did not wish to use the online survey they could send their views by email or post.
402	Questions asked were irrelevant	31	0	See response to 401.

Code frame reference number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
403	Should have asked about other topic areas	57	3	See response to 401.
404	Consultation/questions are biased/leading	378	4	Our consultations are subject to rigorous pre-launch scrutiny and are planned and delivered according to good practice standards. The consultation provided the opportunity for the public and stakeholders to answer questions about reducing congestion, increasing active travel and the effectiveness of each of the proposed Congestion Charging scheme changes in achieving these aims. These closed questions were followed by two open questions that allowed respondents to make any comments they had, and were invited to let us know of any positive or negative impacts they had identified and also any mitigations for them.
405	Response options to questions were limited/should have been more response options	318	3	See response to 404. Further opinions could be expressed within the free-text boxes, while it was also possible to send views on the proposals by email or post if people did not wish to respond through the online survey.
406	Issues with the survey not working correctly/reporting errors with the questions	124	0	We take every precaution to ensure our consultation materials, including the survey, are well designed and that the information contained is correct and consistent. However, sometimes errors can occur despite our best efforts. After launching the Congestion Charge consultation, we noticed two issues with the survey design: 1. In the online survey in Q17 ('How do you think our proposals would affect the way you travel within the CCZ?'), shortly after launching the consultation we noticed an issue with the answer options available to respondents. Depending on which answer option a respondent chose,

Code frame reference number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				they would be directed to one of two follow-up questions. This is done by a 'skip logic' feature in the survey design. However, for one answer option the 'skip logic' feature was initially set up incorrectly and was misdirecting some respondents to the wrong follow-up question. This affected 65 respondents, all of whom we wrote to explain and to offer the opportunity to amend their response. 2. As well as an online survey, we also offered a printable version that could be mailed into us at a Freepost address. The vast majority of respondents choose to either complete our online survey, or send us an emailed consultation response. Fewer than ten respondents choose to complete a paper-based survey and return it to us. At the close of the consultation we noticed an issue between the two versions of the survey, online and paper-based. In Q17, the paper-based survey provided one additional answer option that was missing from the online version. Please see Chapter 4 of this report where we describe this issue further and explain how we have managed this in our reporting.
602	More information/clarity needed/unable to find appropriate information to be able to comment	86	5	The material supporting the consultation contained a wide range of information that provided background to what was being proposed, why it was being proposed, and what it is forecast to achieve. This was supported by a technical IIA, which considered in detail the implications of the scheme across various themes as well as an equalities impact assessment. We received feedback from some stakeholders on the consultation materials we published in support of our proposals and requests for further information. We have addressed this feedback above in sections 5.3.9 to 5.3.18.

Accessibility

Table 5-17: Responses to issues raised on the consultation (accessibility)

Code frame reference number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
420	Promotion/advertising/awareness of consultation is poor/low/lacking	49	1	We want our consultations to be fully accessible to anyone that wants to take part, as well as making as many relevant people and stakeholders aware of them and how they can take part. We publicised the consultation in a variety of digital and non-digital ways; this is outlined in section 3 of the Consultation Report. It is unfortunately not always possible to match everyone's expectations in terms of public engagements. However, our consultation publicity always gives details of how people can contact us by phone, email or via our website if they are unable to attend the available events.
421a	Suggest further consultation/engagement needed	33	9	See response to 401 and 420. Our consultation on proposed changes to the Congestion Charging scheme ran for an 11-week period, including a one-week extension. We received more than 4,000 written submissions, including almost 100 from stakeholders. TfL will continue to meet regularly with stakeholders including those in the field of delivery and servicing, electric charging, car rental and businesses as part of its regular engagement activities.

Code frame reference number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
421b	Suggest further consultation/engagement needed - need for further consultation	0	1	See response given in 5.3.9, part (e) in the section 'Comments on specific proposals – Proposed new Cleaner Vehicle Discount'
422	Consultation/survey was difficult to find/access (general comment)	55	1	While it was necessary for people to register to respond to the consultation and use the portal for the first time, the same log-in information can be used for future consultations without having to repeat the standard questions, such as those regarding demographic information. For those who did not wish to register, it was still possible to access the supporting information and to send a submission to the consultation by email or Freepost. Information on how to access the consultation was widely published and advertised across different channels. Paper copies of the consultation materials and survey were made available for those who requested it. People could reply with their paper survey responses or letters using a Freepost address.
423	Disagree with registering before being able to complete the survey/should be able to give views without registering/sharing personal information	35	0	See response 422.
424	Suggest registration/login process should be simplified	36	0	Registration is now required to respond online to our consultations to enable us to notify people of the outcome of the project or provide an update and allow us to notify people about other projects that may be of interest to them. It also helps us to ensure that people adhere to our community guidelines, underpinning a safe, constructive environment for everyone using 'Have your say'. This includes optional questions about

Code frame reference number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				demographics so that we can understand the extent to which a particular group who may be impacted is responding to our consultation, or is responding with specific concerns we need to address. While registration is required when someone is using the consultation portal to respond through the online questionnaire for the first time, as detailed above, it was also possible for responses to be submitted by email and post. A FREEPOST address was provided, and no postage charges applied. In addition, a telephone line was made available for people to talk to us in person.
425	Criticism of TfL website (general comment)	28	0	We want our consultations to be accessible to anyone that wishes to take part. Our aim was to ensure the consultation was accessible to anyone that wanted to take part. Our online web pages use software that meets WCAG 2.1, (Web Content Accessibility Guidelines) the current global web content accessibility standard. Visitors to the web page could customise their online experience to suit individual needs. The following accessibility tools were available: page narration, colour project changes, larger font sizes, and translation text into around 100 languages if needed. British Sign Language (BSL) video of the proposals and survey were provided as part of our consultation materials. In addition, we created Audio track versions of the proposals and survey. We offered a BSL conversation service which would allow the TfL consultation lead to have a two-way BSL translated discussion

Code frame reference number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
				with the BSL user. To help support London's diverse communities, our Have Your Say platform is also able to translate our consultation website materials into many different languages.
426	Criticism of survey inclusivity (general comment)	9	0	See response 425.

Other comments on the consultation

Table 5-18: Responses to issues raised on the consultation (other)

Reference	Code frame reference number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
	440	No issues/general positive comment about consultation/consultation material	4	1	Support is noted.
	441	Concern consultation responses will have no/little impact on TfL decisions/just a tickbox exercise	239	3	When developing consultations, we follow best practice guidelines to ensure our activities are legally compliant, open, and honest. We hold public consultations while our proposals are at a formative stage, and in advance of a final decision being made as to how we may proceed. Through consultation we seek to listen to respondents and to understand the reasons why

Reference	Code frame reference number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
					they may view proposals positively or negatively. The feedback we receive through consultation is used as part of our decision-making process.
	442	Comment/reference to other/previous consultations	19	1	N/A
	443	Other comments about consultation/consultation material	38	2	N/A

5.8 Issues which were not related directly or indirectly to the proposals or the scheme

5.8.1 We identified a number of issues which, in our judgement, were not related either to the proposals directly, or to a related matter. In our consideration, these unrelated issues would give no scope to amend the proposals, nor would they provide any substantive reason against implementing them. Table 5-19 presents these issues raised.

Table 5-19: Responses to issues raised – not directly or indirectly related to the proposals or the scheme

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
232	Suggest more enforcement of poor cyclist behaviour	41	0	We have noted these comments.
361	Concern reduction in road space causes congestion (e.g. bus lanes, cycle lanes, Low Traffic Neighbourhoods (LTNs))	195	2	We have noted these comments.

Code frame response number	Issue/comment	Times raised (public)	Times raised (stakeholder)	Our response
362	Suggest reducing/improving traffic calming measures/traffic light timings	110	3	We have noted these comments.
363	Suggest increasing/improve green spaces	15	0	We have noted these comments.
364	Suggest removing bus lanes/cycle lanes/increasing road space for cars/vehicles	68	2	We have noted these comments.
347	Suggestion about Routemaster Buses (including double decker electric/new routemasters/zero emission buses/vehicle accessibility)	152	0	We have noted these suggestions/comments.
600	Supportive/positive comment about the Mayor/Government/TfL	4	1	We have noted these comments.
601	Criticism/negative comment about the Mayor/Government/TfL	458	8	We have noted these comments.
604	Unclear comment/unsure what referring to	10	0	We have noted these comments.
605	Comment/comparison to other country/city	120	6	We have noted these comments.
607	Don't know/unsure/no opinion/unable to comment	7	0	N/A
700	Out of scope comment/unrelated to proposals and not captured elsewhere	159	1	N/A
800	Other (does not fit into code frame)	192	22	N/A

- 5.8.2 All of the issues we identified, including those which we considered were not related directly or indirectly to the proposals, are listed in the code frame developed by AECOM in Appendix D.

6 Conclusions and recommendations

6.1 Conclusion

The package of proposals

6.1.1 It is recommended that the proposed changes are implemented as follows:

Proposal A: Changes to the charge level

6.1.2 It is recommended that the charge level is increased to £18 on 2 January 2026, with the charge for paying up to three days after travel increasing to £21.

Proposal B: Changes to the CVD

6.1.3 It is recommended that this proposal is implemented in two phases as set out in the consultation materials.

6.1.4 Phase 1: from January 2026, a 50 per cent discount for electric vans, HGVs light quadricycles and heavy quadricycles registered for Auto Pay/Fleet Auto Pay; and a 25 per cent discount for electric cars registered for Auto Pay/Fleet Auto Pay.

6.1.5 Phase 2: from 4 March 2030, a 25 per cent discount for electric vans, HGVs, light quadricycles and heavy quadricycles registered for Auto Pay/Fleet Auto Pay; and a 12.5 per cent discount for electric cars registered for Auto Pay/Fleet Auto Pay

Proposal C: Changes to the Residents' Discount for new applications

6.1.6 It is recommended that this proposal is implemented as consulted on, noting that there are recommended mitigations to the impacts of this change as set out in the following paragraphs which necessitate modifications to the 2025 Variation Order.

Consultation proposal to be implemented

6.1.7 It is recommended that from 1 March 2027, residents who apply for the Residents' Discount will be subject to new vehicle eligibility criteria which mean that they will only qualify if their vehicle is an EV. Residents who have registered for the Residents' Discount prior to 1 March 2027 would retain their discount regardless of their vehicle's fuel type, now and in the future ('grandparent rights').

Changes proposed as a result of consultation/potential mitigations

6.1.8 As a result of feedback concerning the potential impact of the proposed changes to the Residents' Discount on low income residents of the CCZ, we

have developed two mitigations 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. One of the mitigations may also facilitate the use of car club EVs by residents as an alternative to privately owned EVs (by residents who were not registered for the discount prior to 1 March 2027) or as an alternative to the use of non-EVs (by residents who were registered for the discount prior to 1 March 2027 and have grandparent rights). Both mitigations require changes to the Congestion Charge Scheme Order and will be implemented by way of modifications to the 2025 Variation Order.

Mitigation A: Extension of the current vehicle eligibility criteria for residents on low incomes and on in receipt of certain benefits until March 2030 and grandparent rights

6.1.9 The new vehicle eligibility criteria for the Residents' Discount are proposed to apply from 1 March 2027, however, in response to feedback we intend to adjust the rules for residents in receipt of certain benefits. These residents will not need to have an EV in order to qualify for the Residents' Discount if they apply between 1 March 2027 and 4 March 2030 and will receive grandparent rights going forward (a 90 per cent discount regardless of their vehicle's fuel type). The qualifying benefits are⁴⁹:

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

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

Mitigation B: 100 per cent discount for car club EVs based in bays in the CCZ

6.1.11 A specific new 100 per cent discount for back to base car club⁵⁰ EVs based in bays in the CCZ is recommended as a mitigation to the proposed changes to the Residents' Discount for existing and future residents who may require a vehicle to travel and for whom it may be harder to access EVs, without which

⁴⁹ The benefits are aligned with the changes to benefits taking place which would see some subsumed by Universal Credit from March 2026.

⁵⁰ 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

they would have to pay the full user charge for travel in the CCZ within charging hours.

6.1.12 Vehicles which are licensed as PHVs, listed as capable of self-driving under section 1 of the Automated and Electric Vehicles Act 2018, authorised as self-driving under the Automated Vehicle Act 2024 or which are operated pursuant to an automated passenger service permit are excluded. This change would come into effect at the same time as most of the other changes, 2 January 2026.

Revisions to the Mayor's Guidance

6.1.13 It is recommended that the revisions to the Mayor's Guidance are made as consulted on. This would mean that in future the Mayor would expect that TfL would have regard to the following new procedures when exercising our road user charging functions:

- Six weeks would be the minimum consultation period TfL would be expected to consult for when proposing:
 - a new road user charging scheme;
 - major changes to a road user charging scheme; or
 - the revocation of a road user charging scheme.

Three weeks would be the minimum consultation period when proposing minor changes.

- Routine charge level increases and changes which are procedural or administrative in nature may be made by routine variation. A consultation need not be undertaken but the change(s) would need to be set out in a variation order made by TfL and confirmed by the Mayor. Adequate notice and publicity is also needed.
- A charge level increase would be routine if the increase is 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.

6.1.14 An Equality Impact Assessment (EqIA) will be undertaken each time we develop changes to user charges in the future and will inform the decisions of TfL and the Mayor.

7 Appendices

A – Supplementary Information

B – Marketing materials and questionnaire

C – Updated Integrated Impact Assessment (IIA)

D – Code frames used by AECOM in analysing the responses

E – Consultation analysis report (by AECOM)

F – List of Stakeholders contacted

G – Summaries of stakeholder responses

H – Stakeholder responses to closed questions

Contents:

Appendix A – Supplementary Information

Appendix B – Marketing materials and questionnaire

Appendix C – Integrated Impact Assessment (IIA)

Appendix D – Code frames used by AECOM in analysing the responses

Appendix E – Consultation analysis report (by AECOM)

Appendix F – List of Stakeholders contacted

Appendix G – Summaries of stakeholder responses

Appendix A: Supplementary Information

Supplementary information for the proposed package of changes to the central London Congestion Charge

May 2025

Contents

1. Introduction	5
Purpose.....	5
Overview of proposed package of changes	5
2. The Congestion Charging scheme	6
History of the scheme.....	6
Initial impacts of the scheme	7
The Congestion Charge in recent years	7
3. The case for new proposals	8
The Mayor's Transport Strategy (MTS).....	9
MTS objective for an 80 per cent active, efficient and sustainable mode share by 2041	9
MTS objective of efficient use of street space in central London.....	10
Air quality and the climate emergency	11
Support for businesses to make the switch to zero emission transport	12
4. The package of proposals and the expected impacts	13
A. Changes to the Charge Level.....	14
B. New Cleaner Vehicle Discount for electric vehicles	15
C. Changes to the Residents' Discount for new applicants only from March 2027	24
Additional proposed changes	25
Automated vehicles	26
Impact of the package of proposals	26
5. Summary of the Integrated Impact Assessment	29
The wider impacts of the proposed package	30
6. Next steps	35

1. Introduction

Purpose

This document provides information on a proposed package of changes to the Congestion Charging scheme. It includes some background context on the history of the scheme, why we are proposing to change it and how the proposals have been developed. It also outlines the expected traffic impacts of the proposals as well as the potential wider impacts, as identified in the draft Integrated Impact Assessment (IIA). This Supplementary Information is part of the suite of materials to support the public and stakeholder consultation, which runs from Tuesday 27 May to Monday 4 August 2025 inclusive.

Overview of proposed package of changes

Managing traffic levels and using London's road space more efficiently with better-managed freight and fewer car trips, and supporting journeys by public transport, walking and cycling, will help address many of the challenges Londoners face. These include the climate crisis, air pollution, health and inactivity, road danger and congested roads. Less congestion means fairer access to amenities, jobs and services. It will enable children to travel independently, create more pleasant streets and strengthen the local economies in our town centres and high streets. One of the ways in which we can achieve these aims is through the Congestion Charging scheme.

The Congestion Charging scheme was introduced in central London in February 2003. The primary objective of the scheme is to manage traffic and congestion in central London.

Since its introduction, there have been a number of changes to the scheme, including to the level of the daily charge and penalty charge for non-payment, the boundary of the charging zone, the operating days and hours, payment methods, discounts and exemptions to the charge.

The [Mayor's Transport Strategy](#) (MTS) contains Proposal 20, which states:

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.

We are now consulting on changes we think will make the Congestion Charging scheme more effective in managing traffic and congestion in central London while contributing to achieving MTS objectives. These include the sustainable mode share target; promoting efficient movement in central London, particularly of essential freight, servicing and bus journeys; and using road user charging schemes to address toxic air pollution, the climate emergency and traffic congestion. The Mayor also has ambitions for London to be a net zero carbon city by 2030 and to achieve the World Health Organization's (WHO) air quality guidelines as soon as possible.

Our proposals are made up of three parts:

Proposal A: increasing the Congestion Charge from £15 to £18 so it remains effective in managing traffic and congestion and retains its deterrent effect. The charge was last increased in 2020¹

¹ The Congestion Charge was increased from £11.50 to £15 on 22 June 2020 as part of the temporary changes introduced in response to the Covid-19 pandemic. Following a public consultation in summer 2021, further changes to the scheme were implemented in 2022 including a continuation of the £15 charge level (see [MD 2883](#)).

Proposal B: introducing a new Cleaner Vehicle Discount (CVD) for electric vehicles (EVs)² with the discount level varying by vehicle type. The current 100 per cent CVD will end on 25 December 2025. We are proposing it will be replaced with a new CVD to offer long-term targeted support for people and businesses switching to EVs, helping to reduce carbon and improve air quality

Proposal C: changes to the Residents' Discount from 1 March 2027 for new applicants to support residents in switching to EVs

Additionally, on behalf of the Mayor, we are consulting on some proposed changes to the Mayoral Guidance which applies to the exercise of our road user charging functions. The changes would better reflect the approach we follow when undertaking consultations in comparable circumstances and when setting charges for TfL services, notably public passenger transport fares.

A fuller description of the proposals and the implementation timetable are set out in section 4. Subject to the consultation and if confirmed by the Mayor, Proposals A and B would come into effect from 2 January 2026, Proposal C would come into effect from 1 March 2027 and any revisions to the Mayoral Guidance would be published later this year.

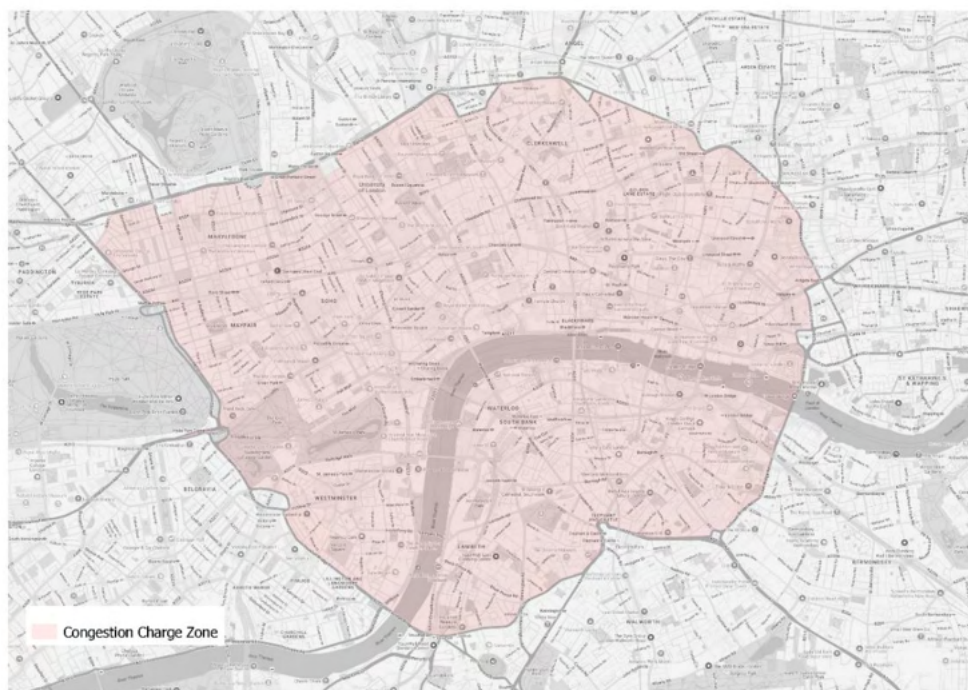
2. The Congestion Charging scheme

History of the scheme

The Congestion Charging scheme was first introduced in central London on 17 February 2003. The current boundary of the Congestion Charging Zone (CCZ) is shown in Figure 1. The primary objective of the scheme is to manage traffic and congestion in central London by reducing the number of vehicles that enter the CCZ during charging hours by imposing a charge during certain hours. This secures further benefits identified below.

Figure 1: The Congestion Charging Zone

² Including battery electric vehicles (BEVs) which have no combustion engine, and hydrogen (H2) fuel cell electric vehicles. These vehicles have no air pollutant or carbon emissions at the tailpipe.



The scheme requires that a daily charge is paid for each charging day that a vehicle is driven in the charging zone during charging hours. The Congestion Charging scheme has a number of [discounts and exemptions](#), and a small number of [reimbursements](#). Generally, customers have to register for a discount and provide proof of eligibility. Exemptions are usually automatically applied.

Initial impacts of the scheme

Following its introduction in February 2003, the Congestion Charging scheme was very effective in reducing traffic and congestion in the CCZ. By April 2004, there was a 30 per cent reduction in congestion within the CCZ, and a 15 per cent reduction in circulating traffic within the zone.³ It remains an integral part of managing demand for road space in central London and delivering the aims of the MTS, and achieving the Mayor's vision for a safer, fairer and greener London.

In addition, by reducing the overall volumes of traffic within the CCZ and increasing the efficiency of circulating traffic, the Congestion Charging scheme was responsible for a reduction in emissions. As of April 2004, this equated to approximately a 12 per cent emissions reduction of both NO_x and PM₁₀ from road traffic within the zone⁴ and a 19 per cent reduction in emission of CO₂ (carbon dioxide) from road traffic within the zone based on a 24-hour average day, since the introduction of the scheme.⁵

The Congestion Charge in recent years

The Congestion Charging scheme has now been in operation for more than 20 years and has been modified many times in that period. These changes have covered a variety of aspects,

³ Congestion Charge Second Impacts Monitoring Report, TfL, 2004 <https://content.tfl.gov.uk/impacts-monitoring-report-2.pdf>

⁴ Nitrogen dioxide (NO₂) and particulate matter (PM) are the two main pollutants of concern in London owing to their adverse impacts on human health. The exhaust emissions that give rise to NO₂ are oxides of nitrogen (NO_x), which are made up of both nitric oxide (NO) and NO₂. PM₁₀ refers to particles with a diameter of 10 microns and smaller.

⁵ Congestion Charge Second Impacts Monitoring Report, TfL, 2004

ranging from the level of the charge to changes to payment methods, operating hours and changes to discount eligibility criteria.

In accordance with Proposal 20 in the MTS, we continually monitor the number of vehicles being driven in the CCZ, and this includes characteristics such as the vehicle type, how and when it is used, the mix of fuel types, and the number of uncharged vehicles.⁶

Similarly, and as described in detail in section 4, we have progressively tightened the criteria for the 'green discount' for vehicles with low or zero emissions (currently the CVD) as numbers of eligible vehicles in the zone have risen and vehicle technology has improved. We have also made changes to improve the offer to our customers, such as the introduction of Auto Pay in 2011⁷, which removes the risk of a Penalty Charge Notice (PCN) for non-payment. Auto Pay now acts as a single payment account for other road user charges such as the Ultra Low Emission Zone (ULEZ) and the [Silvertown and Blackwall tunnels charges](#), and is used by most customers.

These changes were made to maintain the effectiveness of the scheme to manage traffic in central London and respond to changing wider conditions, such as the availability of new payment technology.

3. The case for new proposals

As well as managing traffic, the Congestion Charge has a role to play in making the city a better place to live, work and visit, contributing to achieving the other MTS objectives in London.

Given the tightly constrained road network in central London, efficient movement is fundamental to the continued success of this area, and the success of London in general. Reliable deliveries and servicing, high-quality public services and easy access to workplaces and cultural and leisure attractions, are all dependent on an efficient transport network.

Every year, congestion costs the capital billions of pounds – in 2024 alone vehicle congestion cost London £3.85 billion, averaging £942 per driver.⁸ This heavily impacts businesses, bus customers and other essential services.

Compared to buses and people walking and cycling, cars take up considerably more road space per person. A shift from car use to sustainable modes makes more efficient use of London's constrained road network, providing the only long-term solution to the congestion challenges.

Managing traffic levels and using London's road space more efficiently with better-managed freight and fewer car trips, and supporting journeys by public transport, walking and cycling will help address many of the challenges we face, including the climate emergency, air pollution, health and inactivity, road danger, congested roads, and fairer access to amenities, jobs and services. It will enable children to travel independently, create more pleasant streets and strengthen the economic recovery of our town centres and high streets.

The Congestion Charging scheme helps manage traffic and congestion in central London, which will help tackle poor air quality and the climate emergency, and it will also help to deliver the Mayor's ambition for Vision Zero and support vibrant, attractive and inclusive public spaces, as well as contributing to achieving other MTS objectives in London. The changes proposed in this

⁶ Certain vehicles such as TfL buses, vehicles with 9+ seats, taxis and motorcycles do not pay the Congestion Charge. For a full list of discounts and exemptions, see: <https://tfl.gov.uk/modes/driving/discounts-and-exemptions>

⁷ Fleet Auto Pay existed prior to this date.

⁸ <https://inrix.com/press-releases/2021-traffic-scorecard-uk/> This figure does not take into account the cost of congestion on bus passengers and bus operating costs

consultation arise from the need to ensure the scheme remains effective in managing traffic in central London, to optimise its contribution to MTS objectives, including supporting a shift to EVs. By supporting people and businesses in the shift to EVs and the consequential air quality and carbon benefits of these vehicles, the changes will help to achieve the Mayor's vision for a fairer, safer and greener London.

The Mayor's Transport Strategy (MTS)

The central aim of the MTS is for 80 per cent of all trips in London to be made on foot, cycle or public transport by 2041.

To achieve this, the expected outcomes of the MTS include:

- a 95 per cent mode share for walking, cycling and public transport for trips within central London (up from 90 per cent in 2015) by 2041
- a 99 per cent mode share for walking, cycling and public transport for trips between central London and inner/outer London (compared with 95 per cent and 90 per cent respectively in 2015) by 2041

In 2022, following a public consultation, the Mayor published a revision to the MTS which reflected the Mayor's ambitions for air quality aims in Greater London to align with new WHO guidelines⁹ and for London to be a net zero carbon city by 2030. A new proposal was inserted which provides that TfL may 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.

Although this revision was made in the context of the proposed expansion of ULEZ London-wide (which was subsequently implemented in August 2023), it also applies to the Congestion Charging scheme.

MTS objective for an 80 per cent active, efficient and sustainable mode share by 2041

The central aim of the Mayor's Transport Strategy (MTS) is for 80 per cent of all trips in London to be made on foot, cycle or public transport by 2041, with changes across London's transport network designed to make journeys faster and more reliable and transform London's streets for a more sustainable future.

Reducing traffic improves conditions for active, efficient and sustainable modes by reducing delay to journey times for individuals and businesses, improving reliability for buses and making streets safer for people walking, wheeling and cycling. The Congestion Charging scheme is a means of encouraging a shift to sustainable modes by acting as a deterrent to some vehicle trips in central London.

Delivering this objective requires that London's public transport provides a reliable and practical alternative to car use, and that people feel safe and confident to walk and cycle. Achieving this

⁹ WHO guidelines were tightened in September 2021 so that there are now lower thresholds for recommended levels of pollutants <https://www.who.int/publications/i/item/9789240034228>

requires that the negative impacts of traffic and congestion caused by motorised vehicles are reduced, and that there is an appropriate difference between the cost of public transport and the cost of driving.

In 2023, the active, efficient and sustainable mode share for all travel in London was estimated at 63.2 per cent, an increase on the two previous years but below the required target to meet the MTS aim.¹⁰ In central London, 94 per cent of London residents travelling into the CCZ use these modes.¹¹ Central London is very well-served in terms of options for public transport, walking and cycling, meaning that for many trips there are excellent alternatives to private car use.

The proposed increase to the charge level will support this objective by ensuring that this deterrent effect is maintained in the context of wider inflation, and by helping to ensure that using public transport does not become relatively less attractive due to fares increasing at a greater rate than the Congestion Charge.

MTS objective of efficient use of street space in central London

Given the tightly constrained road network in central London, efficient movement is fundamental to the continued success of this area and, given its strategic importance, the success of London in general. Reliable deliveries and servicing, high-quality public services and easy access to workplaces and cultural and leisure attractions are all dependent on an efficient transport network.

Compared to buses and people walking and cycling, cars take up considerably more road space per person. Hence, a shift from car use to sustainable modes makes more efficient use of London's streets, providing the only long-term solution to the congestion challenges that, as outlined in the MTS, threaten London's status as an efficient, well-functioning city.

The MTS sets a total traffic reduction target of 10-15 per cent by 2041 to tackle congestion and improve the efficiency of streets for the movement of people and goods.

The Congestion Charging scheme helps to manage demand for road space in central London by requiring that most drivers pay a charge during charging hours, meaning that some will choose to use other modes (such as bus or walking), re-time their journey to outside charging hours, or not make the journey.

Freight and servicing in central London

Managing freight and servicing trips has benefits in terms of reducing air quality and carbon emissions and achieving Vision Zero. The MTS has an objective to reduce the number of lorries and vans entering central London during the weekday morning peak by 10 per cent from 2016 levels, by 2026. This reflects pressures on the road network at this time of the day and will help to reduce road danger.

Since the pandemic, the reduction in vehicles has meant this target has been met, but prior to this van numbers had been increasing and in the period 2017/18-2018/19 they were above the target. In 2024, although below the target, van traffic increased. It remains important to reduce motorised freight trips to avoid vehicle numbers returning to pre-pandemic figures. We must also continue to encourage a shift to the most efficient and sustainable options for these journeys. This includes re-timing journeys where possible to avoid peak periods, switching to EVs and making it easier to make some trips using more sustainable modes such as cargo bikes.

¹⁰ Page 11 of Travel in London 2024, TfL <https://content.tfl.gov.uk/travel-in-london-2024-annual-overview-acc.pdf>

¹¹ London Travel Demand Survey, 2023/24.

As set out in relation to the previous MTS objective, the proposed charge level increase will help to make choosing public transport, walking and cycling easier both by ensuring that the cost of driving is proportionate to the cost of public transport, and by enabling a more attractive street environment by managing traffic effectively. We are also supporting freight and businesses, which may be more reliant on driving in the zone, with a package of measures to help electrify the fleet and, where appropriate, make more use of cargo bikes.

Air quality and the climate emergency

The Mayor has set out his ambition for a net zero carbon London by 2030, his ambition to achieve the 2021 WHO air quality guideline levels and that this will require coordinated action from all levels of government.¹² This is reflected in Proposal 24.1 (described above), while a number of other policies and proposals in the MTS set out how we will reduce harmful air pollution and carbon emission from road transport. Approximately half the nitrogen dioxide (NO₂) emissions in London derive from road transport and the highest NO₂ concentrations are located at congested roads.¹³

There are a number of policies and programmes which support us meeting our air quality and climate ambitions. A key scheme here is the ULEZ, which was first implemented in central London in April 2019, and subsequently expanded to inner London (October 2021) and London-wide (August 2023). As a result of all phases of the ULEZ, in 2024 roadside NO₂ concentrations are estimated to be 54 per cent lower in central London, 29 per cent lower in inner London and 24 per cent lower in outer London than they would have been without the ULEZ.¹⁴ In addition, road transport is responsible for 19 per cent of carbon emissions¹⁵ in London. Again, ULEZ schemes have had an impact on reducing carbon emissions. CO₂ emissions are estimated to be six per cent lower across London in 2024 due to all phases of the ULEZ.¹⁶ Cumulatively since 2019, CO₂ emissions are estimated to be 813,000 tonnes lower across London, equivalent to a two per cent reduction.¹⁷

We are also taking action on the vehicle fleets we operate and regulate. London continues to have the largest zero-emission bus fleet in western Europe, which has increased to over 1,900 buses compared to just 30 in 2016. We are on track to have a fully zero-emission bus fleet by 2034 and are working on opportunities to accelerate in line with the Mayor's ambition for a fully zero-emission bus fleet by 2030 (subject to additional Government funding).

For taxis and private hire vehicles (PHVs), licensing requirements have accelerated the shift to zero emission capable (ZEC)¹⁸ and EVs. The taxi trade and the PHV industry have been very successful in switching to these vehicles and reducing emissions. Over 60 per cent of London licensed taxis and 53 per cent of London licensed PHVs are now ZEC or electric.¹⁹

¹² Air Quality in London 2016-2024, <https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/environment-and-climate-change-publications/air-quality-london-2016-2024>

¹³ London Assembly press release 21 Feb 2022 [Air pollution from London's road transport | London City Hall](#)

¹⁴ London-wide Ultra Low Emission Zone One Year Report, <https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/environment-and-climate-change-publications/london-wide-ultra-low-emission-zone-one-year-report>

¹⁵ In 2015. From London Environment Strategy 2018 <https://www.london.gov.uk/press-releases/assembly/air-pollution-from-londons-road-transport>

¹⁶ ULEZ One Year On Report, 2025, page 57 <https://content.tfl.gov.uk/london-wide-ulez-one-year-report.pdf>

¹⁷ ULEZ One Year On report, 2025, page 57

¹⁸ For taxis, this means having CO₂ emissions of no more than 50g/km and a minimum 30 mile zero emission range. For PHVs, it means they must emit no more than 50g/km CO₂ and be capable of being operated with no (zero) exhaust emissions for a minimum range of 10 miles; or emit no more than 75g/km CO₂ exhaust emissions and be capable of being operated with no (zero) emissions for a minimum range of 20 miles.

¹⁹ From Taxi and private hire action plan, TfL, 2025 <https://content.tfl.gov.uk/taxi-private-hire-action-plan-2025.pdf>

The green discounts for the Congestion Charge have been one of the ways we have incentivised drivers in central London to shift to cleaner vehicles, to ensure that where people drive, their impact on air quality and carbon emissions is as low as possible. The proposal to provide a new CVD after December 2025, with complementary changes to the Residents' Discount (including 'grandparent rights') means that we can support customers for longer in their adoption of EVs.

Support for businesses to make the switch to zero emission transport

As described above we have number of policies and programmes in place to help the transition to EVs and thereby reduce carbon and air pollutant emissions. We have a particular focus on supporting businesses, where there is the opportunity to achieve significant emissions reductions (as explained in section 4) but greater challenges in terms of moving away from using petrol and diesel vehicles and in adopting EVs.

TfL is supporting the transition to electric vans and more sustainable freight modes by working with stakeholders to improve our understanding of the challenges facing the freight and servicing industry, supporting EV charging infrastructure rollout, including charge points suitable for them and facilitating the wider adoption of cargo bikes as a sustainable alternative for many van trips. The proposed new CVD is another way we propose to support businesses with electrification.

The EV infrastructure network in London has grown by over 400 per cent since 2019 and we are broadly on track to have the forecast 40,000-60,000 charge points required by 2030 (as set out in [London's 2030 Electric Vehicle Infrastructure Strategy](#) published in 2021). This includes the delivery of rapid and ultra rapid charge points, which are more likely to suit the needs of high-mileage business users such as electric van users for top-up charging.

We also continue to unlock Greater London Authority (GLA)²⁰ group land for rapid EV charging, providing new rapid and ultra-rapid charge points on our road network in addition to the 300 rapid charge points we have already delivered. In December 2024, Places for London, TfL's property company, entered into a joint venture partnership with charge point operator Fastned to develop a network of new ultra-rapid charging hubs across our estate. Each hub site will deliver at least six ultra-rapid charging bays and will use 100 per cent certified renewable energy. Construction at the first site in Hatton Cross has commenced and is expected to be operational by early 2026.

We, along with the Mayor and other organisations, have also been calling for the extension of the plug-in van grant to 2026, which has recently been confirmed by the Government. Grants are also available for organisations, including businesses and charities, towards the cost of installing charge points at their sites.

The scrappage scheme which supported the London-wide expansion of the ULEZ provided a higher level of grant (an additional £2,500) for businesses and charities upgrading to an electric van. As a result, eligible applicants could receive £9,500 towards the scrapping or donating of a non-compliant van and purchase of an electric van to replace it. As of 7 September 2024, over 380 applications for scrapping a non-compliant van and replacing with an electric van had been approved. The previous scrappage scheme which supported the ULEZ introduction to central London and its subsequent expansion to inner London also included higher grant payment levels for those scrapping and replacing a non-compliant van with an electric van. The previous scrappage scheme approved 169 applications for this option.²¹

²⁰ TfL is a statutory body created by the Greater London Authority (GLA) Act 1999. This Act gives the Mayor of London a general duty to develop and apply policies to promote and encourage safe, integrated, efficient and economic transport facilities and services to, from and within London. For more information on how TfL is governed, see [How we are governed - Transport for London](#).

²¹ The previous scrappage scheme reported vans and minibuses together, so this figure includes both vehicle types.

We are also supporting the shift towards more sustainable movement of freight through the promotion of and support for cargo bikes. They are a safe, clean and in many cases more efficient alternative to vans and other light goods vehicles. In line with the actions outlined in our [Cargo bike action plan](#), we published [Cargo bike operations in London: a guide](#) in July 2024. This is the UK's first comprehensive guidance on cargo bikes, providing businesses with the tools and information to help them make the switch to cargo bikes.

Despite this progress, we still need to go further to meet our targets. The Congestion Charging scheme is an effective way of contributing to the above MTS objectives and in delivering the Mayor's vision for London. While we must carefully manage the number of vehicles driving in the CCZ, the transition to EVs is a critical part of achieving air quality and climate change ambitions, improving the environment in London. The changes proposed to the scheme in this consultation arise from the need to ensure the scheme remains effective in managing traffic in central London, supporting the move away from motorised traffic where possible, while ensuring those who drive do it in the cleanest possible vehicles.

4. The package of proposals and the expected impacts

The three tables below summarise the proposals for the changes to the charge level, the new CVD and the changes to the Residents' Discount.

Table 1: Summary of Proposal A: changes to the charge level

	2025 (Current situation)	From 2 Jan 2026	Future charge levels
Daily charge	£15	£18	Future charge levels to be set in accordance with the procedure set out in the Greater London Authority Act 1999 and the Mayor's Guidance
Pay within three days (see details in following section)	£17.50	£21	

Table 2: Summary of Proposal B: new Cleaner Vehicle Discount²²

	2025 (Current situation)	From 2 Jan 2026	From 4 March 2030
New CVD for electric vans, Heavy Goods Vehicles (HGVs), quadricycles registered for Auto Pay	100% discount to be withdrawn on 25 December 2025 £0	Phase 1 50% discount £9	Phase 2 25% discount TBC²³
New CVD for electric cars registered for with Auto Pay	100% discount to be withdrawn on 25 December 2025 £0	Phase 1 25% discount £13.50	Phase 2 12.5% discount TBC

²² Discount is on the daily charge only. There is no option to pay discounted charges after the day of travel.

²³ References to 'TBC' in Table 3 and 4 indicate that the future charge level is unknown and will be set in accordance with the procedure set out in the Greater London Authority Act 1999 and the Mayor's Guidance.

Table 3: Summary of Proposal C: Changes to the Residents' Discount for new applications²⁴

	2025 (Current situation, no changes proposed)	From 2 Jan 2026	From 1 March 2027
Residents registered for the Residents' Discount up 1 March 2027	90% discount £1.50	90% discount £1.80	90% discount TBC 'Grandparent rights' apply - see section below
Residents who have not previously registered for the Residents' Discount with EVs from 1 March 2027			90% discount
Residents who have not previously registered for the Residents' Discount with non-EVs from 1 March 2027			No discount - see section below

A. Changes to the Charge Level

Background and rationale

The current charge level is £15 per day for a vehicle driven inside the CCZ during charging hours. Most customers use Auto Pay to pay the charge but there are also other ways to pay in advance or up to midnight on the day of travel. Additionally, there is an option to pay by midnight of the third day after travelling in the zone, set at £17.50.²⁵ As set out in Proposal B below, customers must use Auto Pay to qualify for the new CVD.

The charge level was last changed in 2020 when it increased on a temporary basis from £11.50 to £15 in response to the challenges of the pandemic, and then permanently increased to £15 in 2022. Previous changes included an increase in 2014 from £10 to £11.50, in 2011 from £8 to £10 and in 2005 from £5 to £8. It is now five years since the last charge level increase, and it is timely to review whether a further increase is necessary to maintain the effectiveness of the scheme.

In the period since the last charge level increase, the financial effect of the charge in terms of its deterrent effect has eroded in the context of wider inflation and an increase is necessary to maintain the effectiveness of the scheme. It is also important to ensure that taking public transport does not become relatively less attractive due to fares increasing more, or at a greater rate, than the Congestion Charge.

²⁴ Discount is on the daily charge only. There is no option to pay discounted charges after the day of travel.

²⁵ Sometimes referred to as Pay Next Day, because prior to a change in February 2022 the requirement was to pay by midnight of the following charging day.

What is proposed?

We propose that the charge level would be increased to £18 on 2 January 2026²⁶, with the charge for paying up to three days after travel increasing to £21. This increase would help to maintain the traffic management effects of the Congestion Charging scheme in central London, support the other aims of the MTS and meet the Mayor's ambitions to improve air quality in London, achieve a net zero carbon city by 2030 and cut congestion in the capital.

B. New Cleaner Vehicle Discount for electric vehicles

Background and green discount to date

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.

The criteria for this discount have tightened over time, enabling us 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 CVD.

The most recent version was introduced in 2019 and is known as the CVD. It has three phases:

ZEC²⁷ 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.

As set out in the [Mayoral decision](#) 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 2018²⁸ giving drivers and vehicle owners seven years' advance notice of the phased approach to the discount and its eventual withdrawal date.

UK context

During the last decade or so there has been a gradual increase in the uptake of EVs. In September 2024, the Society of Motor Manufacturers and Traders (SMMT) reported a 20.5 per cent market share in new BEVs.²⁹ In London, the market share was similar at 19.6 per cent in June 2024. However, these proportions fall short of the Government's zero emission vehicle (ZEV) mandate of 22 per cent of new car sales in 2024 to be electric. From 2025/26, ZEVs, including EVs, are liable to pay Vehicle Excise Duty (VED), and part of the stated rationale for this change was that it was forecast (at the time of the 2022 Autumn Statement) that half of all new vehicles would be electric by 2025.³⁰ Prior to this date, electric cars, vans and motorcycles had been exempt from VED. The

²⁶ Charges paid in advance of the date of travel will be at the level of the charge on the day the charge is paid.

²⁷ Euro 6 standard, emit no more than 75g per km of CO₂ and have a minimum 20 mile zero emission capable range.

²⁸ Mayoral Decision (MD) 2397 <https://www.london.gov.uk/decisions/md2397-amendments-congestion-charge-and-ultra-low-emission-zone>

²⁹ From page 35 of Travel in London, TfL, 2024 [Travel in London 2024 - Annual overview](#)

³⁰ House of Commons Library Research Briefing: VED and zero emission vehicles, March 2025 [CBP-9690.pdf](#)

new approach is that electric cars registered from 1 April 2025 pay the lowest first year rate of tax (currently £10) then pay the 'standard rate' for all fuel types in future years (currently £195). Vans, including electric vans will be charged VED at a standard rate from 1 April 2025.³¹ Heavy Goods Vehicles (HGVs) pay VED based on vehicle type, weight and number of axles.³²

The Government has recently (April 2025) re-confirmed its commitment to end the sale of new purely petrol or diesel cars by 2030 (some new hybrid and petrol or diesel van sales will now be permitted until 2035), with all new cars and vans being fully zero emission by 2035.³³ At the same time, it has acknowledged the challenges this presents and made changes to the ZEV mandate to make it easier for manufacturers to meet target dates for the phase-out of new petrol and diesel cars.³⁴

London context

In London, 4.5 per cent of the overall car fleet is electric, including BEVs which have no combustion engine, and hydrogen (H2) fuel cell electric, and would meet CVD criteria. This figure has increased from two per cent in 2022 and half a per cent in 2020.³⁵ In turn, this has led to electric car kilometres becoming a greater proportion of total vehicle kilometres throughout London. As shown in Figure 2, the highest proportion of electric car kilometres is in central London at twelve per cent in September 2024 (with just over six per cent and just over five per cent in inner and outer London respectively; all figures exclude PHVs). This pattern is even more pronounced for PHVs: electric PHVs accounted for more than 32 per cent of all PHV in central London, 27 per cent for inner London and over 25 per cent of PHV kilometres in September 2024.

Electric vans accounted for nine per cent of total van vehicle kilometres in the same period in central London, more than doubling since the beginning of 2022. Electric van vehicle kilometres accounted for nine per cent of the total in central London (more than doubling since the beginning of 2022), five per cent for inner London and three per cent of vehicle kilometres in outer London respectively.

³¹ ZE cars registered between April 2017 and March 2024 pay the standard rate when they next renew. Vans will pay the standard rate from April 2025. Information from House of Commons Library Research Briefing as above. See <https://www.gov.uk/vehicle-tax-rate-tables> for full information on other vehicle types and years of registration.

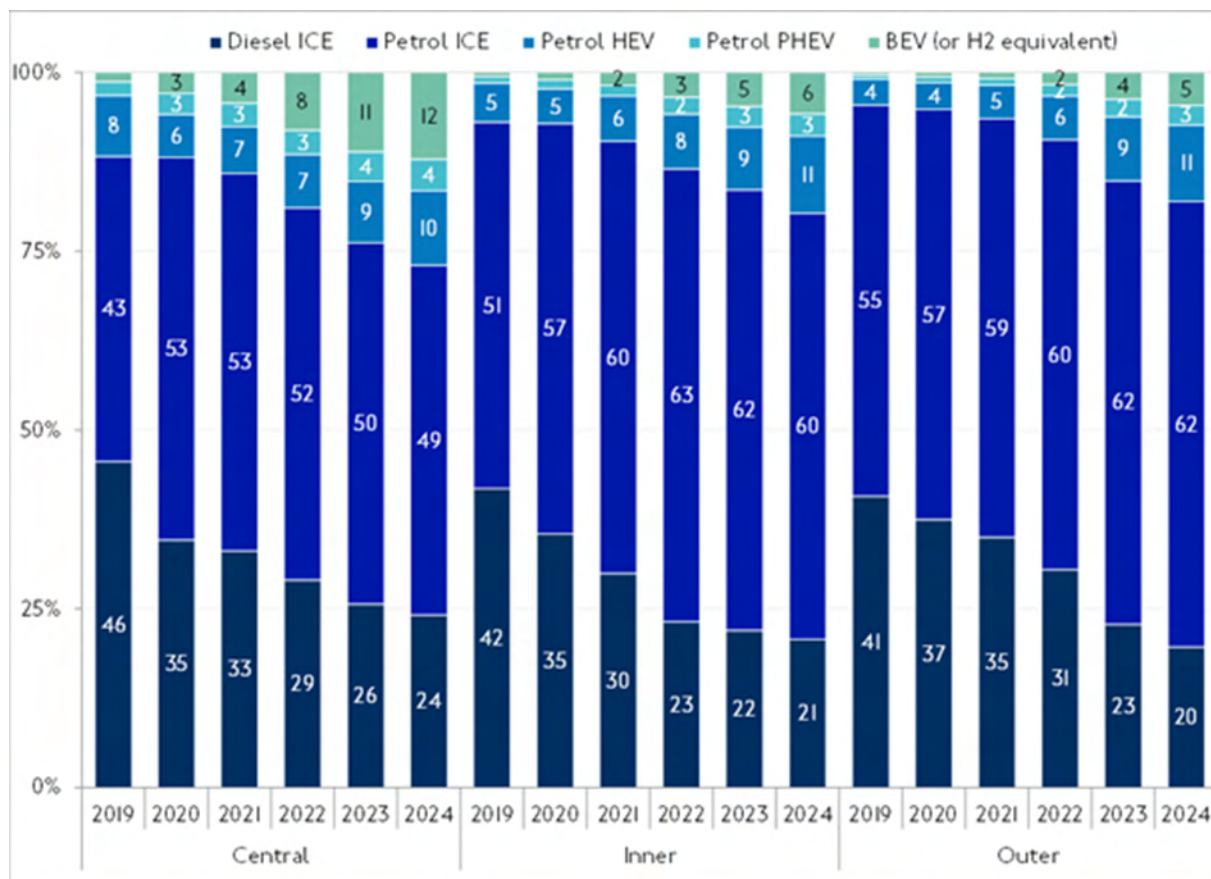
³² House of Commons Library Research Briefing: VED, April 2025 [SN01482.pdf](#)

³³ Announcement of 7 April 2025 [Phasing out sales of new petrol and diesel cars from 2030 and supporting the ZEV transition: summary of responses and joint government response](#) - GOV.UK

³⁴ Announced 7 April 2025 [Backing British business: Prime Minister unveils plan to support carmakers](#) - GOV.UK

³⁵ June 2024 compared with other Quarter 2 data [Vehicle licensing statistics data tables](#) - GOV.UK

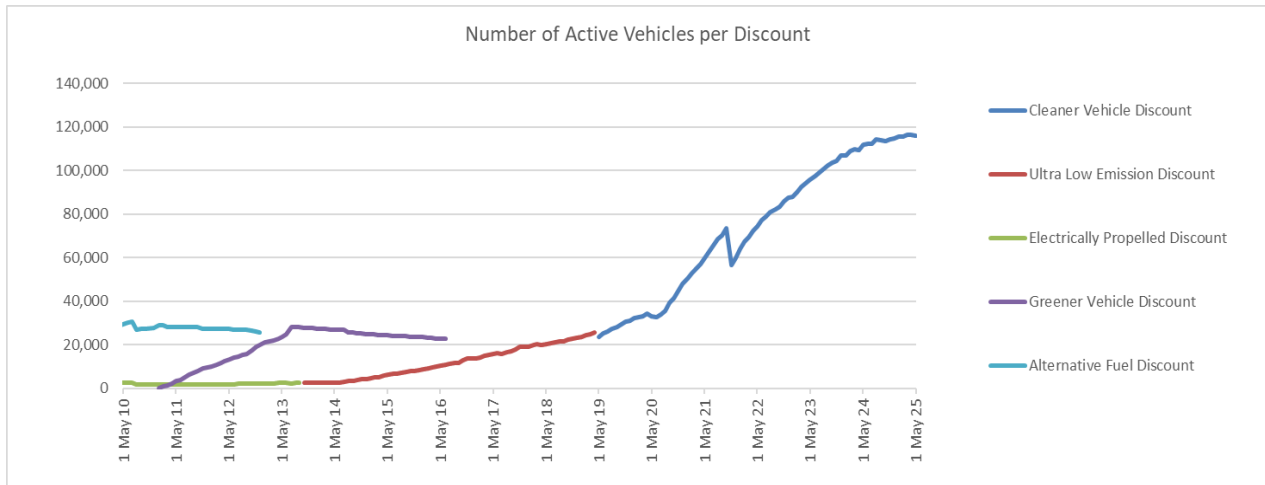
Figure 2: Proportion of estimated car kilometres (excluding private hire vehicles) by fuel type and area of London. Source: TfL



Current situation in the CCZ

Four years after the most recent change to the CVD when the criteria tightened to EVs (battery electric or hydrogen fuel cell vehicles only), the number of vehicles registered for this discount has risen considerably, as shown in Figure 3. Around 20,000 vehicles were registered for the discount at the start of 2019, and there are now around 116,000 vehicles registered. The vast majority of these are cars (91 per cent) with the second highest vehicle type being vans (light good vehicles, LGVs) (six per cent, ca. 6,200 vans registered for the CVD). This represents an all-time high, and with six months until the discount closes in December 2025, is likely to continue to increase even further.

Figure 3: Number of Active Vehicles with the 'green discount' in the CCZ up to May 2025



Electric vehicles in the CCZ

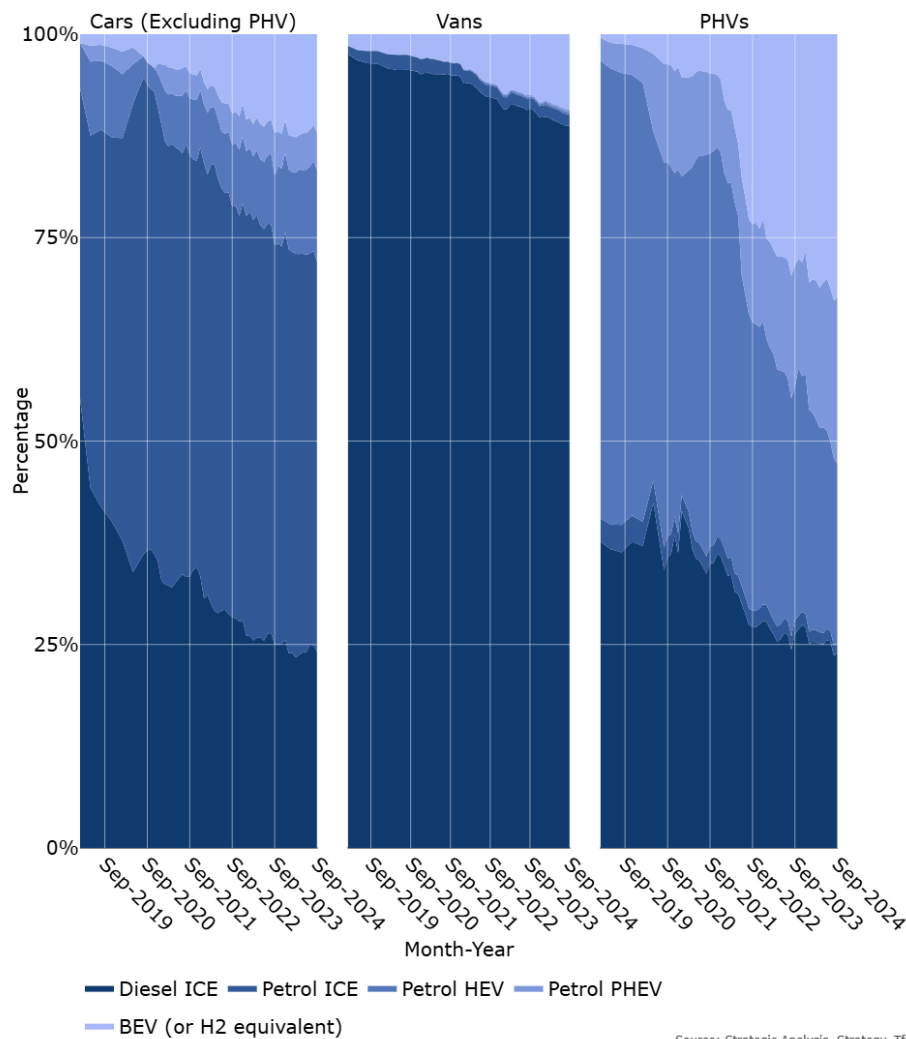
We are now seeing an average of 16,589 unique EVs in the zone³⁶ during weekday charging hours, out of a total average of 105,168 cars, PHVs and LGVs (15.8 per cent). This is made up of 2,193 electric vans, 7,871 electric cars (excluding PHVs) and 6,525 electric PHVs³⁷. The number of EVs in the zone is expected to continue to increase to the end of 2025 when the CVD is due to close, to an estimate of 20,300 EVs during charging hours on an average weekday. This is close to 20 per cent of all vehicles seen in the zone.

As shown in Figure 4 the proportion of EVs inside the CCZ has increased with time. We show this as the number of times each vehicle is captured by our cameras. Comparing an average day in September 2022 to an average day in September 2024, 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.

³⁶ On an average weekday in September 2024. Average figures during weekend charging hours for September 2024 are: 5,469 electric cars (excluding PHVs), 4,943 electric PHVs and 543 electric vans, out of 10,955 total EVs and 67,433 vehicles in total. The weekend figures were not given in the original version of this document; additionally, the weekday average of unique EVs has been updated from 16,568 and the word 'weekday' added for clarity.

³⁷ On an average weekday in September 2024. In an earlier version of this document this was erroneously described as weekdays and weekends.

Figure 4: Percentage of captures of each fuel type for cars, PHVs and vans in CCZ, up to September 2024



What is proposed?

The new Cleaner Vehicle Discount (CVD)

The electrification of the vehicle fleet supports the MTS objectives of better air quality and moving London towards being a net zero carbon city. As already stated, a discount to the Congestion Charging scheme is one of the ways we can support those who drive to do so in an EV. The impacts of such a discount are experienced beyond the CCZ as vehicles are used for other journeys as well.

However, discounts must be balanced against the primary objective of managing traffic and congestion in central London, and the progress already made in driving the uptake of EVs. Having reviewed the scheme, continuing a 100 per cent discount for all EVs after December 2025 is not proposed as it would lead to a significant increase in traffic levels, undermining the objective of the Congestion Charging scheme. We are expecting to see around 20,300 EVs during charging hours on an average weekday by the end of 2025, when the existing CVD is due to come to an end.³⁸

³⁸ Including cars, PHVs and LGVs but excluding non-chargeable vehicles such as taxis and buses.

We are, therefore, proposing to introduce a new CVD with the following headline features (also set out in Table 4 below):

the level of discount would differ by type of EV so that a bigger discount is available for those vehicle types which, overall, customers may find more difficult to switch to electric and require further support to make the switch and help achieve the MTS objectives, and the discount levels would halve from 4 March 2030 as the number of vehicles eligible for the discount and used in the CCZ is expected to rise in line with the continuing growth in EVs. This would help ensure the Congestion Charging scheme remains effective in managing traffic and congestion.

Table 4: The proposed new Cleaner Vehicle Discount (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

In order to qualify for the new CVD, the following conditions must be met:

The vehicle must be electrically-propelled (either battery electric or hydrogen fuel cell) and have zero tailpipe emissions (in other words, it must be an EV)

The vehicle must be registered with the Driver and Vehicle Licensing Agency (DVLA) as an EV. Unlike the existing CVD, a customer will not need to separately register for the new CVD as we will be able to identify the vehicle's fuel type and the vehicle class from its Vehicle Registration Mark (VRM) and the associated DVLA vehicle record³⁹

Once we are satisfied the vehicle is an EV, the discounted charge must be paid by Auto Pay. There is no fee to set up an Auto Pay account and the discounted levels would be automatically applied if the vehicle associated with the Auto Pay account qualifies for the new CVD

Where a customer is already registered for Auto Pay (or Fleet Auto Pay), and their vehicle is registered with the DVLA as an EV, we will automatically collect the discounted charge

Our approach to the new discount

This section provides an overview of our general approach to developing the new CVD in support of the Mayor's vision for London, enabling better air quality and moving towards a net zero carbon city. More detailed rationale for specific elements of the proposal is given in the following sections.

The new proposed CVD will achieve a balance between managing overall traffic and congestion in the CCZ and supporting the electrification of the fleet in support of MTS objectives. Varying the level of discount by vehicle type enables us to provide greater support for vehicles where the

³⁹ A customer will still be required to register for the new CVD and provide proof that their vehicle is an EV if their vehicle is not registered with the DVLA or the DVLA record relating to their vehicle is incomplete, inaccurate or does not otherwise show that the vehicle is an EV or what its vehicle class is.

transition towards EVs has been slower and there are other potential benefits, such as furthering progress towards MTS objectives. Maintaining a discount at some level for all EVs also provides ongoing support and incentives for those driving in the zone to do so in an EV.

It is also proposed that the discount level is halved in 2030 in order to manage traffic levels, which would otherwise increase. This reflects previous experience of the current CVD and its predecessors, which, together with development of the EV market over time, led to an uptick in eligible vehicles being observed in the zone and the consequent need to manage this volume in order not to undermine the scheme's objectives.

The new CVD demonstrates our ongoing commitment to improving London's air quality and reducing carbon emissions. Signalling the phased approach to the discount in advance gives customers the opportunity to plan ahead for vehicle purchase and use, which is especially important for businesses that operate fleets.

We are proposing that the discount is applied automatically to vehicles based on DVLA data. This will be a benefit for eligible customers as it will no longer be necessary for them to register for the CVD (or pay an annual registration fee). It also provides operational benefits as being efficient and cost-effective, removing the need to maintain a register. If a vehicle is not registered with the DVLA or it is not possible to work out from the DVLA vehicle record whether the vehicle is an EV or what vehicle class it falls into, a customer will need to register for the new CVD and provide proof their vehicle is eligible.

Additionally, the new CVD will only be available to customers registered for Auto Pay or Fleet Auto Pay.⁴⁰ Most customers who pay road user charges in London (the Congestion Charge, ULEZ, Silvertown and Blackwall tunnels user charges) have registered for Auto Pay and more than 80 per cent of all Congestion Charge payments are currently made via Auto Pay.⁴¹ There is no charge to register for Auto Pay and it removes the risk of receiving a PCN for non-payment of charges. For those who also drive through the Silvertown and Blackwall tunnels, it would also mean that drivers will benefit from lower off-peak charges most of the time.

A 50 per cent discount for vans and HGVs and light and heavy quadricycles from 2 January 2026, with a 25 per cent discount from 4 March 2030

Vans account for around nine per cent of all CVD registrations currently (the remainder are cars and PHVs). As outlined earlier, the MTS aims to reduce car dependency and free up space in central London for essential freight trips and more reliable bus journeys, as well as for walking, wheeling and cycling. Vans and HGVs constitute the majority of freight trips and while it is important to encourage efficient use of street space by these vehicles (and a switch to cargo bikes where feasible), it is acknowledged that many such trips will be much harder to shift to public transport. We are keen to support London's businesses in their transition to EVs and the proposed new CVD is part of a package of support (described in section 0).

There are also considerable benefits to be gained from reducing air quality and carbon emissions from these vehicles. Road freight represents 30 per cent of London's road transport carbon emissions, but only 17 per cent of vehicle kilometres, showing that freight operations are more carbon intense (gram of CO₂ per km) compared with other vehicle types. This means that the transition to zero emission freight can have a disproportionate positive impact on emissions reduction.

⁴⁰ A UK bank account is required for Fleet Auto Pay but not Auto Pay as payments may be taken from a debit or credit card rather than by direct debit only.

⁴¹ November 2024.

This effect is compounded by the relatively higher frequency of use of vans compared to cars. In general, each van is seen in the CCZ on more days than private cars. In the CCZ, between July 2023 and July 2024, each unique van was seen on an average of 16 days a year whereas each unique car (excluding PHVs) was seen on an average eight days a year. In addition, in the CCZ in 2023, vans were captured in the zone six times per day on average for each unique van seen, whereas cars (excluding PHVs) were captured four times. In particular, electric vans were captured eight times per day on average as opposed to internal combustion engine (ICE) vans at six times, indicating that electric vans travel more within the CCZ than ICE vans. This is not surprising given these are vehicles in commercial use and drivers and operators will organise their usage to get optimal value, for example by only using specific vehicles in the CCZ.

Van operators and owners face more challenges in the take-up of electric vans compared to cars, such as the relatively higher costs of vehicle purchase. Another factor is energy costs; currently, the cost of public charging (rather than at-home charging, which is subject to a price cap and is not subject to VAT) exceeds that of re-fuelling with petrol or diesel.⁴² This is an issue for vehicles like vans which are in use for relatively long periods and may require on-street charging, and is another barrier to realising the full potential of the benefits of electrification.

In the UK, while there has been increased take-up of electric vans, this is still falling short of the target of the Zero Emission Goods Vehicle (ZEGV) mandate⁴³ set by the Government, which requires that, in 2024, 10 per cent of new vans sold are electric, rising annually to 70 per cent in 2030 and to 100 per cent by 2035. One of the ways in which the Government continues to incentivise low emission van and HGV purchase is via the plug-in vehicle grant, which has now been discontinued for cars in order to focus on these vehicles.

Like vans, HGVs account for a disproportionate percentage of emissions: 21 per cent of domestic transport emissions despite only accounting for six per cent of total vehicle mileage.⁴⁴ Electric HGVs are a small but growing market, accounting for half a per cent of new HGV sales in the first quarter of 2024⁴⁵ and, along with vans, remain eligible for the Government's plug-in vehicle grant, with a 20 per cent discount on the purchase price. HGV operators face considerable challenges in terms of transitioning to EVs, similar in many respects to those for vans but with a much more limited range of models available.

We are working to support commercial operators with their transition to EVs, for example with the [commercial fleets dashboard](#), which shows where there is a higher need for charging points for this market. In the context of the Mayor's ambitions for air quality and net zero carbon emissions by 2030, the success of the CVD in electrifying the car and van fleets over the past five years, and the Government's ambition to phase out the sale of new ICE vehicles including HGVs, it is considered appropriate to provide a 50 per cent discount for electric HGVs registered for Auto Pay from 2 January 2026, reducing to a 25 per cent discount from 4 March 2030.

Electric quadricycles (L6 and L7 category vehicles)

While the overwhelming majority of vehicles potentially eligible for the CVD at present are in the car or van categories, there is another type of EV that has been eligible for the current CVD. These are Category L vehicles in the L6 and L7 categories, which are commonly referred to as light or

⁴² Comparison by Zapmap, Feb 2024-Feb 2025 <https://www.zap-map.com/ev-stats/charging-price-index>

⁴³ [Zero emission vans: regulatory flexibility - GOV.UK](#). This notes that from January to June 2024, just under five per cent of new vans sold in the UK were battery electric.

⁴⁴ Electric Vehicles and Infrastructure research briefing, House of Commons Library, 12 July 2024 <https://commonslibrary.parliament.uk/research-briefings/cbp-7480/>

⁴⁵ Ibid. SMMT data.

heavy quadricycles.⁴⁶ There are currently very few in number in the CCZ and more generally, but there is an opportunity for businesses to use them as a lower-cost option for deliveries. These vehicles are typically smaller, lighter and more affordable than petrol or diesel alternatives and as such use less road space, have safety benefits and open up EV options to a wider range of people and businesses.

Most of this fleet is already electric and so accelerating the shift to this fuel type is not a high priority as it is for vans and HGVs. At the same time, the characteristics of these vehicles mean that they align well with both the Congestion Charging scheme and MTS objectives, especially as an alternative to petrol or diesel vans for deliveries and servicing. Because of the potential benefits of other vehicle types switching to these lower impact vehicles, and because the vehicle numbers are relatively small and the impact on traffic is therefore minimal, it is proposed that electric quadricycles which are registered for Auto Pay would be eligible for a 50 per cent discount from 2 January 2026.

The number and proportion of vans, HGVs and quadricycles is expected to increase over time as a wider and more affordable range of vehicles (including second hand vehicles) becomes available. We are, therefore, proposing to reduce the level of discount for L6 and L7 vehicles to 25 per cent (from 4 March 2030) in order to manage the traffic impacts.

A 25 per cent discount for cars from January 2026 with a 12.5 per cent discount from 4 March 2030

Cars are the most numerous vehicles in the CCZ and account for the majority (91 per cent) of vehicles registered for the CVD. The transition to electric cars – which the CVD has supported – has already been successful and, compared to vans, there is a wider and more affordable range of options. While it is important to continue to incentivise the use of electric cars compared to petrol or diesel models, this must be balanced with the need to manage the overall numbers of vehicles in the CCZ, in accordance with the primary objective of the Congestion Charging scheme and MTS objective of efficient use of road space in central London.

Because the proposal relates to vehicle type rather than usage, the proposed CVD discount would apply to all cars, including those in commercial use, notably PHVs,⁴⁷ as well as shared use vehicles such as car clubs or hire cars.

Among PHVs, the transition to EVs and zero emission capable vehicles is already well-progressed, in part due to changes to licensing requirements.⁴⁸ In February 2025, just over a quarter of the PHV fleet was electric.⁴⁹ This high proportion is evident in the proportion of PHVs observed in the CCZ: 44 per cent of all PHVs observed in the zone in June 2024, an increase from 28 per cent in June 2022. Like vans, individual PHVs (both electric and non-electric) are more frequently observed in the CCZ than cars. It is therefore important that we continue to manage their contribution to traffic and congestion. We recently published our second Taxi and private hire action plan, which among other actions sets out how the taxi trade and private hire industry can continue

⁴⁶ For completeness, the L category also includes other vehicles such as motorcycles and powered three-wheelers. Motorbikes are exempt from the Congestion Charge. Motor tricycles which are one metre or less wide, and two metres or less long, are eligible for a 100 per cent discount.

⁴⁷ There is no proposal related to taxis, which are exempt from paying the Congestion Charge

⁴⁸ Over 60 per cent of London licensed taxis and 52 per cent of London licensed private hire vehicles are now zero emission capable and fully electric, Taxi and private hire action plan 2025 TfL, 2025
<https://tfl.gov.uk/corporate/publications-and-reports/taxi-and-private-hire>

⁴⁹ 27.8 per cent of the licensed PHV fleet in London is electric, February 2025 (TfL)

to reduce their environmental impact and how we will support them in this.⁵⁰ It also acknowledges the impact of the changes they have already made over the past 13 years.

A 25 per cent CVD for electric cars registered for Auto Pay will apply from January 2026 and will continue to support the move to electric cars, while managing overall car traffic in the zone. The electric car transition is already well-progressed and the proposed new CVD will ease the move from a 100 per cent discount. It is proposed to halve this discount from March 2030 as eligible vehicle numbers continue to increase, particularly in the context of the Government's ZEV mandate.

C. Changes to the Residents' Discount for new applicants only from March 2027

Background and rationale

In 2003, when the Congestion Charging scheme was introduced, a 90 per cent Residents' Discount, was provided, and remains in place. Residents have received a relatively high discount because of their reduced ability to avoid the charge if they drove in the zone. It has never been considered appropriate for residents to have a 100 per cent discount and they are still required to pay a relatively small charge in recognition of 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.

Because of this 90 per cent discount, the green discounts which have been offered over the years have less influence on residents' choice of vehicle. As outlined above in the section on the proposed new CVD, the proportion of vehicles that are electric has increased significantly in London, and this is reflected in the fact that electric cars account for 12 per cent of all cars observed in the CCZ. In the context of the proposed new CVD and the greater availability and uptake of EVs in recent years compared to 2003 when the Congestion Charge and the residents' discount were first introduced, it is timely to consider potential changes to the Residents' Discount. The proposed changes would align with the objective of the proposed new CVD that everyone who drives in the CCZ during charging hours is incentivised to do so in the cleanest possible vehicle. As well as aligning with MTS policies on reducing private car use in favour of active, efficient and sustainable modes, our proposal reflects the London Plan approach to promoting car-free residential development in central London.

What is proposed?

In order to support and align with the proposed new CVD, we are proposing that vehicle eligibility for those registering for the 90 per cent Residents' Discount after 1 March 2027 will change to apply only to EVs. It is considered appropriate to incentivise those residents who choose to drive in the CCZ to do so in the cleanest available vehicles.

To mitigate the impact on existing residents who may own a vehicle in the expectation that this long-standing discount would remain in place, residents who have registered for the Residents' Discount prior to 1 March 2027 would retain their discount regardless of their vehicle's fuel type, now and in the future. These 'grandparent rights' would apply to residents who have been registered for the discount before 1 March 2027, provided that the discount's other eligibility criteria

⁵⁰ The plan sets out actions to support the PHV industry (and taxi trade) and notes that both are key user groups of EV infrastructure as they make essential trips, have high mileage and will need on-the-go charging. The plan commits to a number of actions to support this in terms of charging infrastructure, lobbying to reduce the cost of charging and vehicle purchase for zero and ZEC vehicles.

continue to be met and timely renewals are made. This means that we are giving residents who are not currently registered for the discount, including prospective new residents who may be in the process of moving into the CCZ or thinking of doing so in future, a notice period of more than 18 months of this proposed change (if confirmed following consultation).

Residents registered for this discount are also able to register a substitute vehicle for up to 30 days in the event that their regular, registered vehicle is not available as it is being repaired or serviced. The requirement for an EV would not apply for the substitute vehicle during this limited period.

Additional proposed changes

Mayor's Guidance

The Mayor has previously issued statutory guidance⁵¹ regarding the exercise of our road user charging functions including the procedures which apply when we make changes to a scheme such as the Congestion Charge ("the Guidance"). This Guidance was last revised in 2022.⁵² We are required to have regard to the Guidance.

The Mayor has asked us to review the Guidance and consider whether any amendments could be made to it which would better reflect the current approach we follow when undertaking consultations in comparable circumstances and when setting charges for our other services, in particular public passenger transport fares.

We have now completed this review and the proposed amendments to the Guidance are set out in a draft revision to the Guidance which is available together with all the other consultation materials on the consultation website.

The proposed amendments provide for the minimum consultation periods specified in the Guidance to be reduced (typically from 10 weeks to six weeks). This is in line with the length of time we usually undertake consultations for in comparable circumstances. It is also similar to the length of time that other local authorities consult for in respect of their road user charging schemes, for example, clean air zones. The now widespread use of digital communication and the consequential change in customers' expectations and experience around how we undertake consultations means that we typically consult for a shorter period of time than we did in 2007 when the consultation periods set out in the Guidance were suggested. The length of a specific consultation period will, in practice, be determined by numerous factors, for example, the complexity of the proposals being consulted on and the volume of material made available.

The draft revisions to the Guidance would also introduce 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 1 per cent.

The inflation indicator we propose to use is the Retail Prices Index annual rate for July which is the rate that is typically used to calculate railway fares. We have, however, allowed for the option of using a different measure of inflation (such as the Consumer Prices Index or the Consumer Prices Index including owner occupiers' housing costs) if it has been used to calculate increases to TfL

⁵¹ Guidance from the Mayor of London to TfL on Road User Charging Schemes pursuant to Schedule 23 of the GLA Act 1999 (2007). <https://www.london.gov.uk/media/76039/download>
This Guidance was last revised in 2022 <https://www.london.gov.uk/decisions/md2987-revision-mts-and-road-user-charging-guidance>

⁵² See Appendix C of MD2987 <https://www.london.gov.uk/decisions/md2987-revision-mts-and-road-user-charging-guidance>

fares or charges for other TfL services. 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. We would be required to give customers reasonable advance notice of the user charge levels and when they would apply from.

This proposed change would allow for charge levels to be better aligned with Tube and TfL railway passenger fares thus ensuring that the cost of driving in central London remains proportionate to the cost of travelling by train. It would also support the achievement of a scheme's objectives and in turn, the sustainable transport mode share aim of the MTS. Where inflation is considered to be a suitable factor by which to increase user charges, the streamlined procedure would enable the increased costs of delivering the MTS to be reflected in the charge levels. 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. We publish a [four-year general programme](#) of how net proceeds are spent.

The proposed revision to the Guidance also provides for changes which are procedural or administrative in nature to be made without the need for consultation.

The Mayor has asked us to seek views on the proposed amendments to the Guidance on his behalf and this consultation on Proposed Changes to the Congestion Charging scheme provides the opportunity for us to do so.

An Equality Impact Assessment (EqIA) will be undertaken each time we develop changes to user charges in the future and will inform the decisions of TfL and the Mayor. For this reason the changes to the Guidance are not considered in the draft IIA for the package of proposals currently under consultation.

Automated vehicles

The Automated Vehicles (AV) Act came into force in May 2024. Automated vehicles are in scope for the Congestion Charge and associated discounts and exemptions. If an AV is electric, it would qualify for the CVD, for example.

We have published a [statement on our approach to automated vehicles](#).

Impact of the package of proposals

Traffic levels

In order to assess the traffic impact of the proposals, we have defined a 'do nothing' scenario (the situation without the package of proposals) for comparison. In this 'do nothing scenario' the charge stays at £15, and the existing CVD ends, as had been planned, on 25 December 2025.⁵³

For the estimation of this 'do nothing' scenario, where the CVD ends by 2025 and there is no charge level increase, we first created a second hypothetical scenario where the current situation does not change and the current CVD is extended into the future (2026 onwards). This second hypothetical was constructed using a combination of TfL's strategic models and EV uptake forecasts. We then created the 'do nothing' scenario, by using monitoring data from past Congestion Charge changes and data from literature to estimate how road users respond to extra costs to drive in the CCZ under the 'do nothing' scenario, to reflect the end of the CVD coming by the end of the year. This same evidence and process was then used to estimate the impacts of the proposals relative to the 'do nothing' scenario.

⁵³ Changes coming from changes to the Residents' Discount have not been considered in this assessment given expected small scale of traffic impact from these changes.

The traffic impacts of the proposals reported here are in comparison to the level of traffic in the equivalent year of the 'do nothing' scenario.

The traffic impacts of the proposed package in terms of the change in unique vehicle numbers (EVs and non-EVs) for 2026, 2030 and 2035 are presented in Figure 5.

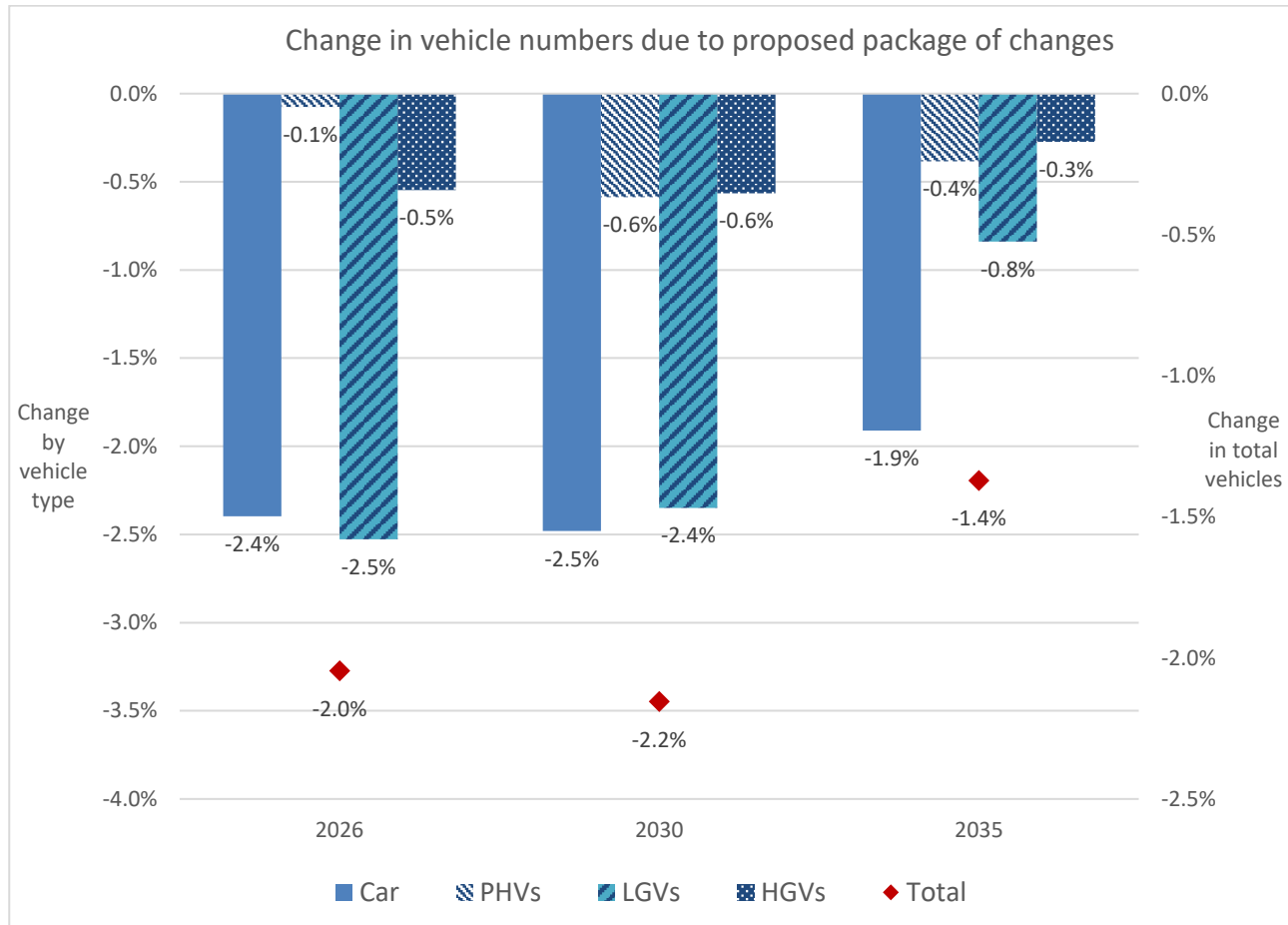
The impacts are compared to the do nothing scenario and are shown by vehicle type.

On an average weekday during the first year of implementation (2026), the impact of the package across all assessed modes during charging hours (07:00-18:00), results in a two per cent reduction in vehicles, equivalent to 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, and decrease towards 2035, showing a 1.4 per cent reduction of vehicles (approximately 1,700 fewer vehicles per day). However, all assessment years show a reduction in vehicle numbers in the CCZ on an average weekday during charging hours, compared to the 'do nothing' scenario.

The largest reductions in vehicle numbers during weekday charging hours are seen in vans (shown as LGVs in Figure 5) and cars. Van numbers are reduced by 2.5 per cent during the first year, and by 0.8 per cent in 2035. Cars are reduced by 2.4 per cent during the first year of implementation, and by 1.9 per cent by 2035. PHV numbers are mainly affected from 2030 onwards, with a slight reduction of 0.6 per cent in 2030 and 0.4 per cent in 2035.⁵⁴ HGVs show a slight reduction of 0.5 per cent in 2026 and a smaller reduction of 0.3 per cent in 2035.

⁵⁴ This forecast does not assume any further specialisation that might occur in the PHV industry affecting further unique vehicle reductions but not their overall activity in the CCZ.

Figure 5: Forecast change in unique vehicles due to proposed package of changes⁵⁵



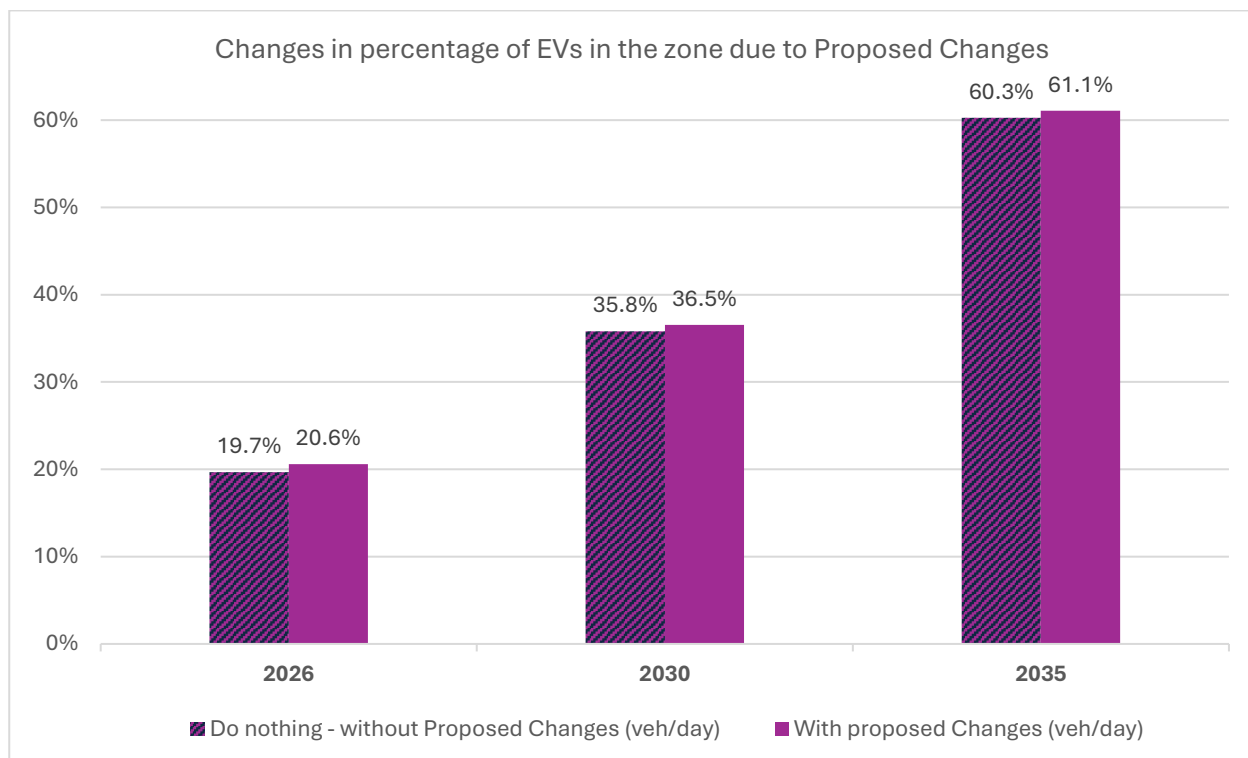
Electric vehicles

As well as vehicle numbers, we have assessed the change in the proportion of the vehicle fleet which is electric as a result of the proposed package, compared to the 'do nothing' scenario (Figure 6). The package leads to a modest increase in the proportion of EVs on weekdays: a 0.9 percentage point increase in EVs in 2026, and an 0.8 per cent percentage point increase in 2035.

Vans are the vehicle type most positively impacted by the proposed new CVD, showing a higher EV uptake than other vehicle types throughout the 10 years of assessment, compared to a scenario without the package. However, both cars and PHVs also show a higher uptake of EVs with the package for the first five years compared to the 'do nothing' scenario.

⁵⁵ Does not include vehicles that aren't directly impacted by changes in CCZ charges, including motorcycles, coaches, TfL buses, non-TfL buses, and taxis.

Figure 6: Forecast change in percentage of EVs in the CCZ due to the package of proposals (vs 'do nothing')



In summary, the overall impact of the proposed package is to reduce traffic numbers in the CCZ and effect a small increase in the proportion of EVs, compared to the 'do nothing' scenario.

Emissions

Annual emissions during charging hours for an average day coming from relevant vehicle types show a decrease across all relevant pollutants, including CO₂, NO_x, PM₁₀ and PM_{2.5}, for all three future years of the assessment, compared to the 'do nothing' scenario where the CVD ends in December 2025 and there is no increase to the charge. These reductions come about as a result of changes in vehicle kilometres travelled and the adoption of EVs.

These changes are most pronounced for NO_x, which reduces by 2.7 per cent in 2026, 2.6 per cent in 2030 and 2.4 per cent in 2035. For CO₂, these reductions are 2.5 per cent in 2026 and 2.6 per cent in both 2030 and 2035. For PM₁₀ and PM_{2.5}, the reductions are 1.8 per cent, 1.9 per cent and one per cent in each of the three years for each pollutant. Reported changes in PM_{2.5} and PM₁₀ result in part from anticipated changes in both exhaust and non-exhaust emissions as the composition of the fleet changes.

Further information on the impacts of the proposals is available in the draft IIA.

Weekend impacts

The relative impact of the proposals on traffic reduction and on the uptake of EVs is broadly the same during the weekend. Further details are available in the draft IIA.

5. Summary of the Integrated Impact Assessment

A change to a scheme such as this will have multiple impacts. It is important that we, in developing the proposals, and the Mayor, as decision maker, understand and consider the potential impacts of the proposals.

The impacts set out below are from the IIA draft document which forms part of the consultation materials. This IIA has been published in draft as part of the public consultation on the package of proposed changes. Following consultation, responses from the public, stakeholders and consultees will be reviewed and the proposals revisited to ensure that any further potential impacts identified during consultation and engagement are assessed where required and, where considered necessary, further mitigations, enhancements or amendments considered.

The 'additional proposed changes' are not in scope for the IIA. The impact of future changes (beyond January 2026) to the charge level will be assessed in an EqIA as part of the development of that change and is not considered in this IIA.

The objective of the IIA is to understand the impacts of proposals, both positive and negative, of the following assessment areas:

- London's economy
- London's environment
- People (Health and Equality)

Each assessment includes a baseline, objectives, evidence of likely impacts of the proposals, assessment of these against the objectives, and a summary of potential positive and negative impacts. The IIA also identifies possible measures to enhance the positive impacts of proposals and mitigate against the negative impacts.

The wider impacts of the proposed package

The full draft IIA report is available to read as part of the supporting information for this consultation, and available on our [consultation webpage](#). Its key findings are summarised below in Table 5.

Table 5: Summary of impacts and proposed mitigations and enhancements

Topic	Description of Impacts	Impact rating	Proposed mitigations and enhancements
London's Economy			
Employment	Neutral impacts overall, with potential for minor relative impacts for those using vehicles to work.	0 Neutral	To support EV drivers, it is recommended that we continue to support the delivery of charging infrastructure in central London to enable a sufficient and appropriate level of charging and support the transition from diesel to EVs. In addition, it is recommended that we continue the promotion of alternative cleaner vehicles for freight and servicing, in line with our Cargo Bike Action Plan (2023), which can also help support those that are less able to absorb the costs from the CCZ. Further measures to continue to improve traffic reduction in central London and enable time savings for those working in the CCZ.
Businesses	Neutral impacts overall, with potential for both minor negative and positive impacts for some sectors.	0 Neutral	To enhance businesses and their performance, it is recommended that we continue to seek opportunities to reallocate road space in the CCZ to cycling and walking and bus priority to promote use of these modes, and further increase potential for people to travel using reliable public transport, and active modes in a safe environment. To support businesses using EVs, it is recommended that we continue to support the delivery of charging infrastructure in central London to enable a sufficient and appropriate level of charging and support the transition from diesel to EVs. In addition, it is recommended that we continue the promotion of alternative cleaner vehicles for freight and servicing, in line with our Cargo Bike Action Plan (2023), to support those that are less able to absorb the costs from the CCZ.
London's wider economy	Neutral impacts overall, with impacts likely to be negligible given the small comparable size of the charge increase with London's economic output	0 Neutral	Further measures to continue to improve traffic reduction and reduce traffic delays in central London, enabling travel time savings and increased productivity in the CCZ.
London's Environment			

Topic	Description of Impacts	Impact rating	Proposed mitigations and enhancements
Air quality	Minor reduction in annual emissions of NO _x , PM ₁₀ and PM _{2.5} within the CCZ during charging hours.	+1 Minor Positive	Further measures to continue to improve traffic reduction will enable a reduction on NO _x and PM pollutants. It is recommended that we continue to support the delivery of charging infrastructure in central London to enable a sufficient and appropriate level of charging and support the transition from diesel to EVs. Continue the promotion of alternative cleaner vehicles for freight and servicing, in line with our Cargo Bike Action Plan (2023).
Climate change	Minor reduction in annual emissions of CO ₂ within the CCZ during charging hours.	+1 Minor Positive	Further measures to continue to improve traffic reduction will enable a reduction on CO ₂ pollutants. It is recommended that we continue to support the delivery of charging infrastructure in central London to enable a sufficient and appropriate level of charging and support the transition from diesel to EVs. Continue the promotion of alternative cleaner vehicles for freight and servicing, in line with our Cargo Bike Action Plan (2023).
Noise	Overall neutral impact on the noise environment. Minor positive impact expected on noise levels, however not expected to be perceptible by people.	0 Neutral	Further measures to continue to improve traffic reduction will enable a reduction in noise coming from road traffic. It is recommended that we continue to support the delivery of charging infrastructure in central London to enable a sufficient and appropriate level of charging and support the transition from diesel to EVs. Continue the promotion of alternative cleaner vehicles for freight and servicing, in line with our Cargo Bike Action Plan (2023).
People			
Crime reduction and safety	Neutral impact on crime and fear of crime. Minor positive impact on road safety in the CCZ due to reductions in traffic. Black, Asian and minority ethnic people, disabled people, older people and children may disproportionately benefit from minor improvements in road safety, as they are at greater risk from road collisions in London	+1 Minor positive	Continue to reduce the risk and increase public awareness of how to act in the event of crime or harassment on our network through marketing campaigns and ensure that our network staff are trained to effectively deal with instances of crime and harassment. In addition to further improving safety and security measures across our network through measures such as improved lighting and enhanced CCTV coverage. Continue to seek opportunities to reallocate road space within the CCZ to cycling, walking and bus priority to promote use and reliability of these modes, and further increase potential for people to travel using active modes in a safe environment.

Topic	Description of Impacts	Impact rating	Proposed mitigations and enhancements
Accessibility, connectivity and social integration	Minor positive impact on travel by active and sustainable modes. Minor negative impact on community groups and on access to community groups, with the following groups being disproportionately impacted: Disabled people, Young People, Older People, Homeless People, People on Low Incomes. Minor negative impact on access to religious services, with the following groups being disproportionately impacted: Religious people, Disabled people, Young People, Older People, People on Low Incomes may be disproportionately negatively impacted.	-1 Minor negative	Continue to seek opportunities to reallocate road space in the CCZ to cycling and walking and bus priority to promote use of these modes and further increase potential for people to travel using reliable public transport, and active modes in a safe environment. Continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on private vehicle use including our discounts available for vehicles with 9+ seats, the 100 per cent Blue Badge discount and our Dial-a-Ride service. In addition to the Taxicard scheme. Continue to reduce the risk and increase public awareness of how to act in the event of crime or harassment on our network through marketing campaigns and ensure that our network staff are trained to effectively deal with instances of crime and harassment. In addition to further improving safety and security measures across our network through measures such as improved lighting and enhanced CCTV coverage.
Health and health inequalities	Minor positive impact on mental and physical health due to positive changes in traffic levels, air quality and noise, disproportionately positively impacting older people, younger people, disabled people, people from Black, Asian and minority ethnic backgrounds, and people on low incomes. Minor positive impact on mental and physical health. Neutral impact on access to health and social care facilities. Minor negative impact on access to residential, informal and domestic care provision, disproportionately negatively impacting older people, and disabled people.	0 Neutral	Continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on travel by private vehicle to access or provide health and social care including the 100 per cent Blue Badge holder discount, and the NHS patient reimbursement scheme.
Access to jobs and training	Minor negative impact on carers on low incomes providing services to vulnerable groups by private vehicle, where charge is not covered by their employer or providing informal care. Potential disproportionate negative impact on Black, Asian	-1 Minor negative	Continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for carers and care workers (including PAs), including our discounts available for vehicles with 9+ seats and the 100 per cent Blue Badge discount and ensure that our NHS patient reimbursement

Topic	Description of Impacts	Impact rating	Proposed mitigations and enhancements
	and minority ethnic women due to the demographics of the industry. Neutral impact on access work or training for people who face barriers to travel by public transport or active travel. Minor negative impact on low-income workers or PHV drivers that require to travel to work in the CCZ where the charge is not passed onto customers. Potential disproportionate negative impact on Black, Asian and minority ethnic and Muslim men due to the demographics of the PHV industry in London.		scheme continues to be available for those who may require use of it.
Protected characteristics and disadvantaged groups	Disproportionate negative impact on people on low incomes required to drive in the CCZ due to the proposed charge level increase, particularly for those less able to use alternative modes to travel, including carers and PHV drivers. Due to the demographics of these sectors, it may lead to secondary negative impacts on Black, Asian and minority ethnic women (carers) and Black, Asian and minority ethnic Muslim men (PHV drivers). This may also have a minor disproportionate negative impact on disabled people and people from certain Black, Asian and minority ethnic groups who are more likely to be on low incomes. Disproportionate negative impact on people on low incomes due to the proposed changes to the Residents' Discount, due to the barriers to ownership of an EV people on low incomes may face. This may also have a minor disproportionate negative impact on disabled people and people from certain Black, Asian and minority ethnic groups who are more likely to be on low incomes. Minor positive impacts on traffic levels and subsequently road safety and air quality.	0 Neutral	Continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on travel by private vehicle to access or provide health and social care including the 100 per cent Blue Badge holder discount, and the NHS patient reimbursement scheme.

6. Next steps

We would like to hear your views on our proposed package of changes to the Congestion Charge, and the changes to the Mayor's Guidance. You can access the questionnaire for these proposals on our [consultation webpage](#).

In addition to this document, you can read more about the potential impacts, both positive and negative, of these proposals in the draft IIA for the proposed changes, also available on our [consultation webpage](#).

Once the consultation closes, we will analyse the responses received and present our report and recommendations to the Mayor. Following this, the Mayor will make a decision as to whether to proceed with the proposals as consulted on, with modifications or not to implement them. The consultation report will be available online following this decision.

Regardless of this decision, customers who have previously received a 100 per cent CVD will need to pay a charge to drive in the CCZ from 2 January 2026. We would encourage all drivers to sign up to Auto Pay to ensure the charge is paid and avoid the risk of a PCN. If the proposed new CVD is confirmed, drivers will need [to be registered for Auto Pay](#) to be eligible for it. There is no fee for registration or renewal for Auto Pay and a single account covers payments for ULEZ, LEZ and the Blackwall and Silvertown tunnels as well as the Congestion Charge.

We will continue to keep the Congestion Charging scheme, including charge level, hours of operation, discounts and exemptions, under review, as per Proposal 20 of the MTS.

Appendix B: Marketing materials and questionnaire

Contents:

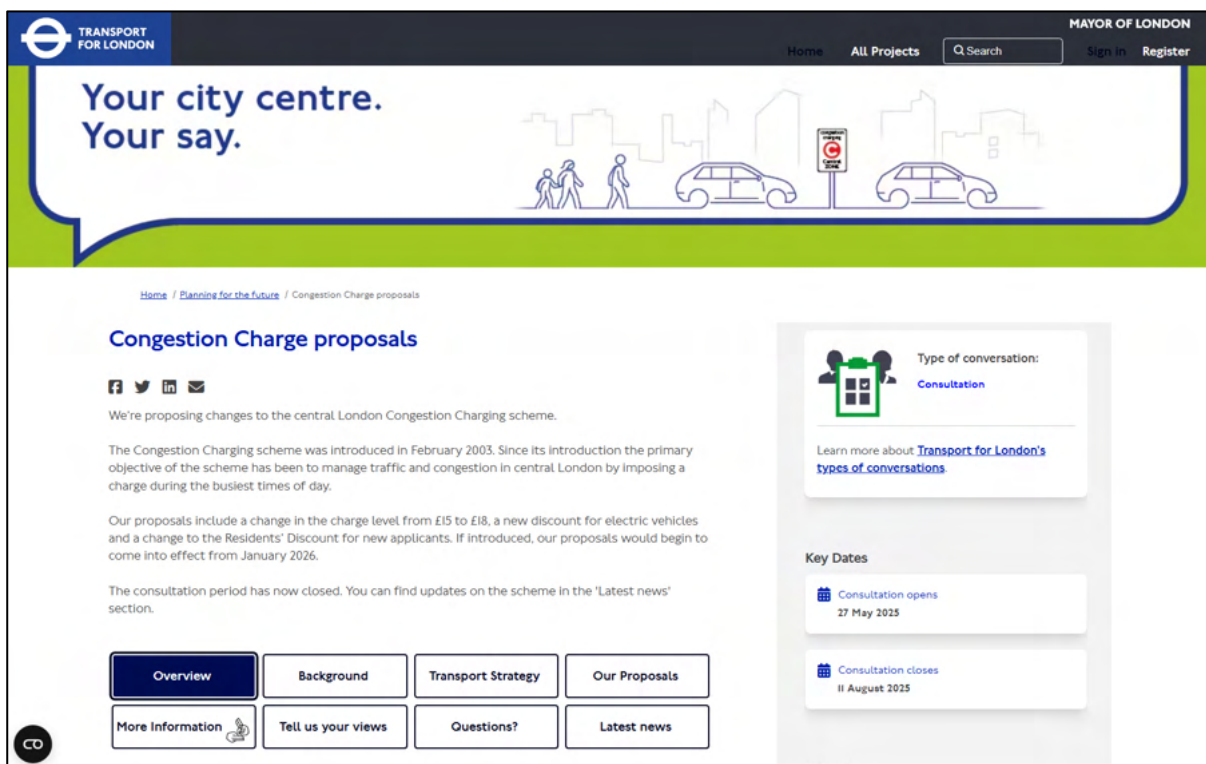
- Appendix B (i): Consultation webpage, questionnaire and 'quick response' survey
- Appendix B (ii): Video explainer script
- Appendix B (iii): Stakeholder emails
- Appendix B (iv): Customer Relationship Management email
- Appendix B (v): Consultation poster and flyer
- Appendix B (vi): Metro Newspaper features
- Appendix B (vii): Press release and media reaction
- Appendix B (viii): London Gazette notice
- Appendix B (ix): Advertisements in local newspapers
- Appendix B (x): Social Media campaign

Appendix B (i): Consultation webpage, questionnaire and 'quick response' survey

(a) Consultation webpage

The consultation was hosted on our 'Have Your Say' online engagement platform. We main address of the webpage (URL) was: <https://haveyoursay.tfl.gov.uk/congestion-charge-proposals>; we also offered a shortened version of this URL: <https://tfl.gov.uk/congestion-charge-proposals>. The consultation webpage remains active to view, however the questionnaire has closed for new submissions.

The following pages offers screenshots of the consultation webpage, including the consultation questionnaire and quick response option.



Overview

The MTS contains proposal 20, which states:

"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."

We are now consulting on changes we think will make the Congestion Charge more effective in managing traffic and congestion in central London while contributing to achieving MTS objectives. These include the sustainable mode share target; promoting efficient movement in central London, particularly of essential freight, servicing and bus journeys; and using road user charging schemes to address toxic air pollution, the climate emergency and traffic congestion. The Mayor also has ambitions for London to become a net zero carbon city by 2030 and for the World Health



Lifecycle

- Open**
This consultation is open for contributions.
- Under Review**
Contributions to this consultation are closed for evaluation and review. The project team will report back on key outcomes.
- Final report**
The final outcomes of the consultation are documented here. This may include a summary of all contributions collected as well as recommendations for future action.

Who's Listening

David Mulligan
Consultation Manager

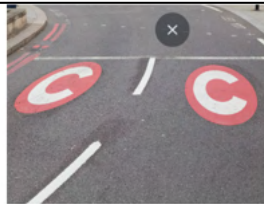
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We are now consulting on changes we think will make the Congestion Charge more effective in managing traffic and congestion in central London while contributing to achieving MTS objectives. These include the sustainable mode share target; promoting efficient movement in central London, particularly of essential freight, servicing and bus journeys; and using road user charging schemes to address toxic air pollution, the climate emergency and traffic congestion. The Mayor also has ambitions for London to become a net zero carbon city by 2030 and for the World Health Organisation's air quality guidelines to be achieved as soon as possible.



Our proposals are made up of three parts:

- **Proposal A:** Increasing the Congestion Charge from £15 to £18 so it remains effective in managing traffic and congestion and retains its deterrent effect. The charge was last increased in 2020
- **Proposal B:** New Cleaner Vehicle Discount (CVD) for electric vehicles whereby the discount varies by vehicle type. While the current CVD will end in December 2025, offering a new discount which will provide long term targeted support for electric vehicles will bring more of the benefits of electrification, including reduced carbon emissions and improved air quality in central London
- **Proposal C:** A change to the Residents' Discount for new applicants to extend the incentivising effect of the CVD to residents

We've assessed our proposals against a 'do nothing' scenario, which would include the end of the current version of the CVD on 25 December 2025. Without our proposals, we estimate next year alone 2,200 more vehicles would use the CCZ on an average weekday during charging hours.

Additionally, on behalf of the Mayor, we are consulting on some proposed changes to the Mayoral Guidance on the exercise of our road user charging powers. The changes would better reflect the approach TfL follows when undertaking consultations in comparable circumstances and when setting charges for TfL services, notably public passenger transport fares.

A detailed description of the proposals, along with the implementation timetable, is provided on this webpage under the 'Our Proposals' tab. Subject to the consultation and if confirmed by the Mayor, the proposed changes would begin to come into effect from 2 January 2026.

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The consultation period has now closed. You can find updates on the scheme in the 'Latest news' section.

Overview	Background	Transport Strategy	Our Proposals
More Information 	Tell us your views	Questions?	Latest news

Background

The Congestion Charging scheme was introduced in central London in February 2003. The primary objective of the scheme is to manage traffic and congestion in central London by reducing the number of vehicles that enter the Congestion Charge Zone (CCZ) by imposing a charge during the busiest times of day.

Following its introduction, the scheme has been very effective in reducing traffic and congestion in central London. There was a 30% reduction in congestion within the CCZ, and a 15% reduction in circulating traffic. It remains an integral part of managing demand for road space in central London and delivering the aims of the Mayor's Transport Strategy (MTS). We keep the charge under review to ensure it remains effective in managing traffic and congestion, making changes when necessary.



Without the Congestion Charging scheme and the changes made since its introduction, congestion would be far worse than it is now. Analysis shows there would have been three million additional journeys by car across London in 2019 without the changes TfL has introduced to encourage more sustainable travel patterns over the last couple of decades, of which the Congestion Charge was a critical first step.

[Return to the top of the page](#)

8

CLOSED: This survey has concluded.

Consultation opens
27 May 2025

Consultation closes
11 August 2025

Lifecycle

- Open**
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- Final report**
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Who's Listening

David Mulligan
Consultation Manager

DM

Overview	Background	Transport Strategy	Our Proposals
More Information 	Tell us your views	Questions?	Latest news

Transport Strategy

The Mayor's Transport Strategy (MTS) recognises that the success of London's transport system relies on more Londoners choosing to walk, cycle and use public transport. As such, the central aim of the MTS is for 80% of all trips in London to be made on foot, cycle or public transport by 2041.

Central London is one of the world's best-connected places, giving people options other than to drive. The MTS sets out that congestion must reduce in central London. Proposal 24.1 of the MTS states:

"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."



This will not only help deliver the vision and central aim of the MTS but also help address poor air quality and the climate emergency, deliver the Mayor's ambition for Vision Zero and support vibrant, attractive and inclusive public spaces. Road user charging is an important tool for realising these objectives.

Every year, congestion costs the capital billions of pounds – in 2024 alone vehicle congestion cost London £3.85 billion, averaging £942 per driver. This heavily impacts businesses, bus customers and other essential services. Longer journey times affect us all.

The MTS outlines that since the introduction of the Congestion Charging scheme the challenges facing central London continue to change. It commits the Mayor and TfL to keeping the Congestion Charge continuously under review to ensure that it remains fit for purpose.

[Return to the top of the page](#)

8

Consultation closes
11 August 2025

Lifecycle

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Who's Listening

David Mulligan
Consultation Manager

DM



Overview

Background

Transport Strategy

Our Proposals

More Information

Tell us your views

Questions?

Latest news

Our Proposals

Proposal A: Increasing the Congestion Charge from £15 to £18

The Congestion Charge has been set at £15 since 2020. It is now five years since the last charge level increase, and it is timely to review whether a further increase is necessary in order to maintain the deterrent effect of the charge in the context of wider inflation. We propose to increase the charge to £18 from 2 January 2026, which would be a lower increase than inflation since 2020. For those paying the charge in the three days after travel, the charge would increase from £17.50 to £21.



This increase would help to maintain the traffic management effects of the Congestion Charging scheme in central London, support the other aims of the MTS, and meet the Mayor's ambitions to improve air quality in London, achieve a net zero carbon city by 2030 and cut congestion in the capital. The increase in charge level reflects the high value of road space in central London and has been assessed and is forecast to have a positive impact on (that is, to reduce) traffic in the CCZ.

Proposal B: Changes to create a new Cleaner Vehicle Discount

The current 100% Cleaner Vehicle Discount applies to all electric vehicles and is due to end on 25 December 2025.



The volume of electric vehicles seen in the zone means a continued 100% discount would lead to worsening traffic and congestion. However, in order to continue to support further adoption of electric vehicles we are proposing the introduction of a new Cleaner Vehicle Discount.

Consultation closes

11 August 2025

Lifecycle

Open

This consultation is open for contributions.

Under Review

Contributions to this consultation are closed for evaluation and review. The project team will report back on key outcomes.

Final report

The final outcomes of the consultation are documented here. This may include a summary of all contributions collected as well as recommendations for future action.

Who's Listening

David Mulligan

Consultation Manager

DM



The volume of electric vehicles seen in the zone means a continued 100% discount would lead to worsening traffic and congestion. However, in order to continue to support further adoption of electric vehicles we are proposing the introduction of a new Cleaner Vehicle Discount.

This will provide long-term support for the cleanest vehicles, recognising their contribution to reducing poor air quality and cutting carbon emissions, while ensuring their numbers do not significantly contribute to increased traffic and congestion in the CCZ.

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 the eligible vehicle numbers are expected to increase over time.

From 2 January 2026:

- 50% discount for electric vans, Heavy Goods Vehicles (HGVs), light quadricycles and heavy quadricycles registered for Auto Pay
- 25% discount for electric cars registered for Auto Pay

From 4 March 2030:

- 25% discount for electric vans, HGVs, light quadricycles and heavy quadricycles registered for Auto Pay
- 12.5% discount for electric cars registered for Auto Pay

We also propose the discount is applied automatically to vehicles based on Driver and Vehicle Licensing Agency (DVLA) data. This will be a benefit for eligible customers as it will no longer be necessary to register for the Cleaner Vehicle Discount (or pay a registration fee).

We are also proposing that payment of the discounted charge is made by Auto Pay only. This means a vehicle must be registered for an Auto Pay account in order to benefit from the CVD.





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Proposal C: Changes to the Residents' Discount for new applicants

Currently, residents of the CCZ receive a 90% discount because of their reduced ability to avoid the charge if they drive during charging hours. A relatively small charge applies because these vehicles contribute to traffic and congestion and to provide an incentive for residents to use more sustainable modes.

In the context of the proposed changes to the CVD it is timely to consider potential changes to the Residents' Discount. As well as aligning with MTS policies on reducing private car use in favour of active, efficient and sustainable modes, our proposal reflects the London Plan approach to promoting car-free residential development in central London.



In order to support the proposed changes to the CVD and the greater availability and uptake of EVs compared to 2003 when the discount was first introduced, we are proposing that eligibility for the 90% Residents' Discount will be limited to only electric vehicles, starting on 1 March 2027. It is considered appropriate to incentivise those residents who choose to own and operate a vehicle in the CCZ to do so in the cleanest available vehicles.

This would apply to new applicants only. To mitigate the impact on existing residents who may be reliant on their vehicle, no changes are proposed to those living in the zone who are already registered for the Residents' Discount, or who register by 1 March 2027 when proposed changes are due to come in to effect, provided that the discount's other eligibility criteria continue to be met and timely renewals are made.

We propose:

- For new applicants, the 90% Residents' Discount would only apply to electric vehicles
- Residents who are already registered would retain the existing 90% discount, including for any new or replacement vehicles, if they continue to meet the discount's other eligibility criteria and renew their registration each year

Mayoral Guidance on TfL's exercise of road user charging functions

The Mayor may issue guidance as to the exercise of our road user charging functions. We must have regard to any guidance that is issued.

6

reducing private car use in favour of active, efficient and sustainable modes, our proposal reflects the London Plan approach to promoting car-free residential development in central London.

In order to support the proposed changes to the CVD and the greater availability and uptake of EVs compared to 2003 when the discount was first introduced, we are proposing that eligibility for the 90% Residents' Discount will be limited to only electric vehicles, starting on 1 March 2027. It is considered appropriate to incentivise those residents who choose to own and operate a vehicle in the CCZ to do so in the cleanest available vehicles.



This would apply to new applicants only. To mitigate the impact on existing residents who may be reliant on their vehicle, no changes are proposed to those living in the zone who are already registered for the Residents' Discount, or who register by 1 March 2027 when proposed changes are due to come in to effect, provided that the discount's other eligibility criteria continue to be met and timely renewals are made.

We propose:

- For new applicants, the 90% Residents' Discount would only apply to electric vehicles
- Residents who are already registered would retain the existing 90% discount, including for any new or replacement vehicles, if they continue to meet the discount's other eligibility criteria and renew their registration each year

Mayoral Guidance on TfL's exercise of road user charging functions

The Mayor may issue guidance as to the exercise of our road user charging functions. We must have regard to any guidance that is issued.

On behalf of the Mayor, we are consulting on some proposed changes to the current guidance which would better reflect the approach TfL follows when undertaking consultations in comparable circumstances and when setting charges for TfL services, notably public passenger transport fares.

Our [Supplementary Information](#) document sets out the proposed changes to the Mayoral Guidance in greater detail.

[Return to the top of the page](#)

More Information

Tell us your views

Questions?

Latest news

More Information

Further details about our proposals are detailed in the [Supplementary Information](#) document.

"Please note, after launching the consultation we noticed some minor corrections required to the Supplementary Information and Draft Integrated Impact Assessment documents. These were corrected and re-uploaded to the webpage on 4 July 2025."

"During the consultation period some additional information was requested and we have also published it [here](#) on 18 July, for others who may be interested".

More background information on the Congestion Charging scheme can be found [here](#).

Draft Integrated Impact Assessment (including Equality Impact Assessment)

2.85 MB PDF

Congestion Charge Zone boundary map

668.76 KB PDF

The Greater London (Central Zone) Congestion Charging (Variation) Order 2025

2.58 MB PDF

The draft consolidated version of the Congestion Charging Scheme Order

416.99 KB PDF

Lifecycle

Open

This consultation is open for contributions.

Under Review

Contributions to this consultation are closed for evaluation and review. The project team will report back on key outcomes.

Final report

The final outcomes of the consultation are documented here. This may include a summary of all contributions collected as well as recommendations for future action.

Who's Listening

David Mulligan

Consultation Manager

DM

STAY INFORMED

Subscribe for project updates

The revisions to the Mayoral Guidance

182.71 KB PDF

Consultation survey in case you would prefer to reply in writing

515.16 KB PDF

Supplementary Information

863.71 KB PDF

The above documents are also available in word version upon [request](#).

Accessible Information

We want to make sure everyone can take part in our consultations. To help make it accessible to everyone we have provided:

- Easy read version of the [proposals](#)
- Easy read version of the [survey](#)
- Audio version of the [proposals](#)
- Audio version of the [survey](#)

You can translate the information on this page into another language by using the 'Select language' button at the bottom of the page.

Connecting with London's deaf community on our consultations

To enhance how we consult with London's deaf community we offer:

- A British Sign Language (BSL) video of our [proposals](#) and [survey](#)
- A BSL conversation service. This allows the TfL consultation lead to have a two-way BSL translated discussion with a BSL user. To request a BSL conversation, please contact us at haveyoursay@tfl.gov.uk and we will be in contact to arrange a convenient time

Return to the top of the page

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Overview

Background

Transport Strategy

Have your say

More Information

Tell us your views

Questions?

Latest news

Tell us your views

You can reply by completing our survey, or if you are short on time, you can submit a quick response.

Take our Survey

Leave a quick response

The closing date for responses is **11 August 2025**.

[Return to the top of the page](#)

CLOSED: This survey has concluded.

Tell us your views

We are holding a ten-week public consultation to hear what you think about these proposals. Please complete and return our consultation survey to share your views on our proposals. Importantly, if you think our proposals can be improved then please use the survey to explain what you think should be changed and how.

You can reply by completing our survey. The closing date for responses is **Monday 11 August 2025**.

To take part in our online survey you will need to register with your email address. Your details will be kept [secure](#).

If you prefer, you can also let us have your comments by:

Consultation closes

11 August 2025

Lifecycle

Open

This consultation is open for contributions.

Under Review

Contributions to this consultation are closed for evaluation and review. The project team will report back on key outcomes.

Final report

The final outcomes of the consultation are documented here. This may include a summary of all contributions collected as well as recommendations for future action.

Who's Listening

David Mulligan

Consultation Manager

DM

If you prefer, you can also let us have your comments by:

- Email: haveyoursay@tfl.gov.uk
- Telephone: 020 3054 6037 to leave your name and contact number and we will call you back. Please quote 'Congestion Charge proposals' when leaving your message
- Write to: FREEPOST TFL HAVE YOUR SAY no postage stamp required

Please note responses to the survey may be made publicly available after the consultation has closed, this would typically be in the form of a report on the results of the consultation exercise, but any personal information will be kept confidential. Your personal information will be properly safeguarded and processed in accordance with the requirements of privacy and data protection legislation. For further information, please visit our [privacy policy](#).

CLOSED: This survey has concluded.

Submit a quick response

We know that life is busy and you may just have one short moment to tell us what you think of our proposals. That's why we now let you submit a quick consultation response.

This is different from our consultation survey as we ask just one short question "Tell us what you think of our proposal".

Your response can be long or short, but importantly it lets us know your views.

You will need to register with our Have Your Say platform to give us your quick response, although your details will be kept [secure](#).

You have until **Monday 11 August 2025** to give us your feedback.

Please note that responses will be made publicly available after the consultation has closed in the form of a report on the results. Your personal information will be properly safeguarded and processed in accordance with the requirements of privacy and data protection legislation. For further information, please visit our [privacy policy](#).

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[Home](#) / [Planning for the future](#) / Congestion Charge proposals

Congestion Charge proposals

[f](#) [t](#) [in](#) [e](#)

We're proposing changes to the central London Congestion Charging scheme.

The Congestion Charging scheme was introduced in February 2003. Since its introduction the primary objective of the scheme has been to manage traffic and congestion in central London by imposing a charge during the busiest times of day.

Our proposals include a change in the charge level from £15 to £18, a new discount for electric vehicles and a change to the Residents' Discount for new applicants. If introduced, our proposals would begin to come into effect from January 2026.

The consultation period has now closed. You can find updates on the scheme in the 'Latest news' section.

Overview	Background	Transport Strategy	Our Proposals
More Information 	Tell us your views	Questions?	Latest news

Questions?

You can use our [question tool](#) during the consultation period. We will respond to your questions as soon as we can.

You can also contact us by [email](#), via our telephone call back service (020 3054 6037) or in writing (FREEPOST TFL HAVE YOUR SAY)

[Return to the top of the page](#)



Type of conversation:

Consultation

Learn more about [Transport for London's types of conversations](#).

Key Dates

 Consultation opens
27 May 2025

 Consultation closes
11 August 2025

Lifecycle

Open
This consultation is open for contributions.

Under Review
Contributions to this consultation are closed for evaluation and review. The project team will report back on key outcomes.

Overview	Background	Transport Strategy	Our Proposals
More Information 	Tell us your views	Questions?	Latest news

Latest news

Update 12 August 2025

The consultation has now closed.

We would like to thank all respondents to the consultation for taking part.

We will review feedback received and produce a consultation report in due course. We will update this webpage and write to all respondents at that time.

The consultation report will help the Mayor to reach a decision on whether to confirm the proposals for the Congestion Charging scheme, with or without modification, and publish the revisions to the Mayoral Guidance.

The report will be published to our consultation webpage and made available to everyone. In addition, we will write to all those who take part in the consultation to share the report upon publication.

 Consultation closes
11 August 2025

Lifecycle

Open
This consultation is open for contributions.

Under Review
Contributions to this consultation are closed for evaluation and review. The project team will report back on key outcomes.

Final report
The final outcomes of the consultation are documented here. This may include a summary of all contributions collected as well as recommendations for future action.

(b) Consultation questionnaire:

 This survey no longer accepts submissions

Tell us your views

We are holding a ten-week public consultation to hear what you think about these proposals. Please complete and return our consultation survey to share your views on our proposals. Importantly, if you think our proposals can be improved then please use the survey to explain what you think should be changed and how.

You can reply by completing our survey. The closing date for responses is **Monday 11 August 2025**.

To take part in our online survey you will need to register with your email address. Your details will be kept [secure](#).

If you prefer, you can also let us have your comments by:

- Email: haveyoursay@tfl.gov.uk
- Telephone: 020 3054 6037 to leave your name and contact number and we will call you back. Please quote 'Congestion Charge proposals' when leaving your message
- Write to: FREEPOST TFL HAVE YOUR SAY no postage stamp required

Please note responses to the survey may be made publicly available after the consultation has closed, this would typically be in the form of a report on the results of the consultation exercise, but any personal information will be kept confidential. Your personal information will be properly safeguarded and processed in accordance with the requirements of privacy and data protection legislation. For further information, please visit our [privacy policy](#).

About you

To help us understand a bit more about you, please answer the following questions:

1. Can you please confirm if you are responding as an individual or as an official representative of an organisation (e.g. an interest group, charity or trade body).

(Choose one option)

- ☐ As an individual
- ☐ As an official representative of an organisation

2. If you are responding as an official representative of an organisation, then please provide its name below.

Maximum 255 characters

0/255

3. Please confirm your postcode:

Maximum 255 characters

0/255

4. What encouraged you to complete this questionnaire? I'm interested in the proposals because...

(You can choose more than one option)

- ☐ I'm a resident in the Congestion Charge zone
- ☐ I'm a local business owner in the Congestion Charge zone
- ☐ I'm employed in the Congestion Charge zone
- ☐ I drive in the Congestion Charge zone
- ☐ I'm a visitor to the area
- ☐ I'm a taxi driver (Black Cab)
- ☐ I'm a private hire vehicle driver
- ☐ I'm just interested in the proposals
- ☐ Other (please specify)

Your travel views

To help us understand your views on travel in London, please answer the following questions.

5. How important is it to you that we take steps to reduce traffic and congestion in central London?

(Choose any one option)

- ☐ Not at all important
- ☐ Slightly important
- ☐ Important
- ☐ Fairly important
- ☐ Very important
- ☐ No opinion

6. How important is it to you that we take steps to encourage the use of electric vehicles in central London where driving is necessary?

(Choose any one option)

- ☐ Not at all important
- ☐ Slightly important
- ☐ Important
- ☐ Fairly important
- ☐ Very important
- ☐ No opinion

Your travel habits

To help us understand more about how you travel in London, please answer the following questions.

7. Do you drive in central London?

- ☐ Yes
- ☐ No

8. If you drive in central London, what type of vehicle do you usually drive?*(Please tick all that apply)*

- ☐ Bus/Coach - electric
- ☐ Bus/Coach – petrol/diesel
- ☐ Large commercial vehicle (truck, HGV) – electric
- ☐ Large commercial vehicle (truck, HGV) – petrol/diesel
- ☐ Light commercial vehicle (van, pickup truck, three-wheeler) – petrol/diesel
- ☐ Light commercial vehicle (van, pickup truck, three-wheeler) – electric
- ☐ Minibus – electric
- ☐ Minibus – petrol/diesel
- ☐ Powered two-wheeler (e.g. Moped, motorcycle) – electric
- ☐ Powered two-wheeler (e.g. Moped, motorcycle) – petrol/diesel
- ☐ Private car – electric
- ☐ Private car – petrol/diesel

9. Are you registered for a discount or exemption to the Congestion Charge or have you used a reimbursement arrangement?

- ☐ Yes I am registered for a discount or exemption
- ☐ Yes I have used a reimbursement arrangement
- ☐ No
- ☐ Don't know

10. If relevant, please state the discount you are registered for or the reimbursement scheme you have used.

(Please tick all that apply)

- ☐ Discount - Residents' Discount
- ☐ Discount - Cleaner Vehicle Discount
- ☐ Discount - Blue Badge
- ☐ Discount - accredited breakdown
- ☐ Discount - vehicles with 9+ seats
- ☐ Discount - motor tricycles
- ☐ Discount - roadside recovery vehicles
- ☐ Reimbursement - NHS patient
- ☐ Reimbursement - NHS staff

11. How often do you drive in the Congestion Charge zone?

(Tick all that apply)

- ☐ Every day
- ☐ 5- 6 days a week
- ☐ 3-4 days a week
- ☐ 1-2 days a week
- ☐ 1-3 times a month
- ☐ Less than once a month
- ☐ Never

11. How often do you drive in the Congestion Charge zone?*(Tick all that apply)*

- ☐ Every day
- ☐ 5- 6 days a week
- ☐ 3-4 days a week
- ☐ 1-2 days a week
- ☐ 1-3 times a month
- ☐ Less than once a month
- ☐ Never

12. Do you have an Auto Pay account with TfL?

- ☐ Yes
- ☐ No, but I intend to register for a free account
- ☐ No, and I don't intend to register for a free account

Auto Pay is a free to register service that enables you to be billed automatically when you travel through the Silvertown or Blackwall tunnels. If you have an existing AutoPay account for Congestion Charge or ULEZ charges you do not need to register again. For more information please visit our webpage: <https://tfl.gov.uk/modes/driving/auto-pay>.

[Previous](#)[Save and continue](#)

Our proposals

The Congestion Charge scheme is an important tool for managing traffic and congestion in central London. It has been kept under review to ensure it remains effective and supports the delivery of Mayor's Transport Strategy.

We are now proposing changes to the charge level, a new Cleaner Vehicle Discount and the Residents' Discount for new applicants. For full details please see the consultation materials. If introduced, these proposed changes would begin to come into effect from 2 January 2026.

The proposals we are now consulting on are:

- [Proposal A: Increasing the Congestion Charge from £15 to £18](#)
- [Proposal B: New Cleaner Vehicle Discount for electric vehicles](#)
- [Proposal C: Change to Residents' Discount for new applicants](#)

The new proposals are part of the commitment by the Mayor of London and TfL to manage traffic and congestion in central London. This would improve London's air quality and encourage more journeys to be made by walking, cycling or public transport.

Mayor's Guidance on TfL's exercise of road user charging functions

The Mayor may issue guidance as to the exercise of our road user charging functions. We must have regard to any guidance that is issued.

On behalf of the Mayor, we are also seeking views on some proposed changes to the guidance which would better reflect the approach TfL follows when undertaking consultations in comparable circumstances and when setting charges for TfL services, notably public passenger transport fares.

13. [Proposal A: Increasing the Congestion Charge from £15 to £18](#)

(Click the link above to view the proposal)

How effective do you consider this proposed change to the Congestion Charge scheme would be in achieving our aims to manage traffic and congestion in central London?

- ☐ No effect
- ☐ Minor effect
- ☐ Moderate effect
- ☐ Major effect
- ☐ Don't know

14. [Proposal B: New Cleaner Vehicle Discount for electric vehicles](#)

(Click the link above to view the proposal)

How effective do you consider this proposed change to the Congestion Charge scheme would be in achieving our aims to manage traffic and congestion in central London?

- ☐ No effect
- ☐ Minor effect
- ☐ Moderate effect
- ☐ Major effect
- ☐ Don't know

15. [Proposal C: Change to Residents' Discount for new applicants](#)

(Click the link above to view the proposal)

How effective do you consider this proposed change to the Congestion Charge scheme would be in achieving our aims to manage traffic and congestion in central London?

- ☐ No effect
- ☐ Minor effect
- ☐ Moderate effect
- ☐ Major effect
- ☐ Don't know

16. **Do you have any comments about the proposals or the proposed changes to the Mayoral Guidance? This could include comments about the impact, positive or negative, that our proposals may have on you.**

Please highlight if this impact is due to a protected characteristic you may have, or whether the impact may affect others due to their protected characteristic.

Please note which proposal your comment is about or if you are commenting on the Mayoral Guidance.

16. Do you have any comments about the proposals or the proposed changes to the Mayoral Guidance? This could include comments about the impact, positive or negative, that our proposals may have on you.

Please highlight if this impact is due to a protected characteristic you may have, or whether the impact may affect others due to their protected characteristic.

Please note which proposal your comment is about or if you are commenting on the Mayoral Guidance.

17. How do you think our [proposals](#) would affect the way you travel within the CCZ?

(Choose any one option)

- ☐ I would travel more within the zone by public transport or active travel
- ☐ I would travel less within the zone by public transport or active travel
- ☐ I would travel more within the zone by electric vehicle
- ☐ I would travel less within the zone by electric vehicle
- ☐ I would be unable to travel into or within the zone
- ☐ It wouldn't make any difference to the way I travel

Previous

Save and continue

38% answered

18. As you've indicated that our proposals would likely reduce or prevent your travel into or within the CCZ, please indicate which element of the scheme would cause this?

- ☐ Proposal A: Charge level increase to £18
- ☐ Proposal B: New Cleaner Vehicle Discount for electric vehicles
- ☐ Proposal C: Change to Residents' Discount for new applicants from March 2027

Previous

Save and continue

Tell us your views

50% answered

19. Would our proposals affect your future intentions when purchasing a vehicle?

- ☐ Yes, I am a business owner and would consider shifting to electric vans or cars
- ☐ Yes, I am a business owner and would consider changing my fleet to electric HGVs
- ☐ Yes, I am self-employed and would consider changing to an electric van or car
- ☐ Yes, I would consider buying an electric car
- ☐ I already drive an electric vehicle
- ☐ No, it would not influence my vehicle choice

Previous

Save and continue

Tell us your views

63% answered

About the consultation

20. How did you hear about the consultation? Please select the main way you heard.

Select option



Improving how we consult

When we consult, we want to provide you with accessible, useful, and easy to understand information. We also want to make it as easy as possible for you to share your thoughts, feelings, and feedback on our proposals. We like to think we do this well, but we recognise that there are always lessons we can learn to help us do this better.

To help us constantly improve our consultation service, we'd appreciate just 2 minutes of your time to tell us what you think about this service.

21. Having just completed this consultation, which of the following statements best reflects your experience of accessing the consultation information and sharing your feedback with us.

- ☐ Exceeded my expectations: It was very easy to find the information I needed, and it was very easy to respond.
- ☐ Met my expectations: I was able to find the information I needed, and it was straightforward to respond.
- ☐ Partially met my expectations: I struggled to find some of the information I needed, and I found it difficult to respond.
- ☐ Did not meet my expectations: I couldn't find the information I needed, and it was very difficult to respond.

Previous

Save and continue

Tell us your views

75% answered

22. If we didn't meet your expectations, please tell us how you would like us to improve our consultation service in the future.

Please only share your feedback here on how we could improve our consultation service. If you have further comments on the proposals then please navigate to the main survey using the back button to leave your comments there.

Previous

Save and continue

Tell us your views

88% answered

23. It's always good to talk and we're always keen to discuss how we'll improve our consultation service going forward. If you'd be interested in taking part in helping to shape our consultation service in the future, by taking part in quick polls, webinars, surveys or focus groups, then select one or more of the options below.

☐ Yes – I'd like to take part in online surveys or quick polls

☐ Yes – I'd like to take part in focus groups or webinars

☐ No – I'm not interested in taking part in this research

Previous

Submit

(c) 'Quick Response' option:

! CLOSED: This survey has concluded.

Submit a quick response

We know that life is busy and you may just have one short moment to tell us what you think of our proposals. That's why we now let you submit a quick consultation response.

This is different from our consultation survey as we ask just one short question **"Tell us what you think of our proposal"**.

Your response can be long or short, but importantly it lets us know your views.

You will need to register with our Have Your Say platform to give us your quick response, although your details will be kept [secure](#).

You have until **Monday 11 August 2025** to give us your feedback.

Please note that responses will be made publicly available after the consultation has closed in the form of a report on the results. Your personal information will be properly safeguarded and processed in accordance with the requirements of privacy and data protection legislation. For further information, please visit our [privacy policy](#).

You will be submitting this survey as DavidMulligan, to change this [logout](#)

I. Tell us what you think of our [proposal](#)

Submit

Appendix B (ii): Video explainer script

We produced a short video (87 seconds) to explain the consultation proposals, the different way to find out more about proposals and to encourage the public to take part in the consultation. The video was hosted on our [YouTube channel](#) at [this link](#)⁵⁶; the video remains available to watch.

The following shows how the voiceover to the video would interact with the text on screen; please note the voiceover and text on screen together make up the video script.

Voiceover	Text/visual/animation

⁵⁶ The explainer video is available at this link: <https://youtu.be/gS0wTcdGXlw?si=SdLJVlumNlLyLOYq>.

	Text animates in: Your city centre. Your say. Fades out
We're proposing changes to the central London Congestion Charging scheme.	Cars moving in and out of frame past the Congestion Charge road sign, with pedestrians walking in the background
The Congestion Charge was first introduced in 2003. Since its introduction, the main aim of the scheme has been to manage traffic and congestion in central London by charging vehicles being driven in the area during the busiest times of day.	Zoom in to the Congestion Charge road sign The 'C' roundel changes into the top view of a roundabout with cars travelling around and turning on and off the road intersections
Our proposals include a change in the charge level from £15 to £18*, a new discount for electric vehicles, and a change to the Residents' Discount for new applicants.	Zoom back out, the roundabout changes back to the 'C' charge roundel, then back into the road scene with cars moving and pedestrians walking Text animates in a panel above the road scene: Charge increases from £15 to £18* New discount for electric vehicles¹ Change to the Residents' Discount for new applicants Show this asterisk text on screen at the bottom of the frame: *For those paying the charge in the three days after travel, the charge would increase from £18 to £21. ¹Zero Emission (at the tailpipe) Vehicles.
We're also proposing changes to the Mayoral Guidance which sets out how changes to the scheme are made.	New text animates in to the panel: Changes to the Mayoral Guidance
If introduced, our proposals would begin to come into effect from January 2026.	New text animates in to the panel: Effective from January 2026

Registering for Auto Pay is still recommended if you wish to continue using your vehicle in central London.	
For more details and to have your say on our proposals, scan the QR code, or	QR code and 'Have your say' device animates in
Search: 'TfL Congestion Charge proposals' Email: haveyoursay@tfl.gov.uk Telephone: 020 3054 6037 (this is a call back service) Or write to: Freepost TfL Have Your Say (Congestion Charge)	Text builds on screen: Search: 'TfL Congestion Charge proposals' Email: haveyoursay@tfl.gov.uk Telephone: 020 3054 6037 (call back service) Write to: Freepost TfL Have Your Say (Congestion Charge)
The consultation is open now until Monday 4 th August 2025	Consultation ends Monday 4 August 2025
	TfL and Mayor of London – end frame

Appendix B (iii): Stakeholder email

(a) Consultation beginning

At the start of the consultation on Tuesday 27 May 2025 we sent the following email to stakeholders we had identified as likely to have an interest in our proposals. Our list of stakeholders contacted is provided in Appendix F.

Subject: Proposed changes to the central London Congestion Charge

[Salutation]

I'm writing to inform you that today we are launching a public consultation on proposed changes to the central London Congestion Charging scheme. You can read full details about our proposals, and share your views, on our [consultation webpage](#).

The Congestion Charging scheme was introduced in central London in February 2003 with the primary objective to manage traffic and congestion in central London by imposing a charge during the busiest times of day.

Since its introduction, there have been a number of changes to the scheme, including to the level of daily charge and penalty charge for non-payment, the boundary of the charging zone, the operating days and hours, payment methods, discounts and exemptions to the charge. In 2019 we introduced a 100% Cleaner Vehicle Discount which currently applies to electric vehicles (EVs). This discount is due to end on 25 December 2025.

From 27 May, we will hold a 10-week consultation on a number of changes to the Congestion Charging scheme which will enable us to ensure that it continues to be effective

in managing traffic and congestion in central London, while contributing to achieving the Mayor's Transport Strategy objectives. These include the sustainable mode share target; the need to reduce car use and promote efficient movement in central London, particularly of essential freight, servicing and bus journeys; and using road user charging schemes to address toxic air pollution, the climate emergency and traffic congestion. The Mayor also has ambitions for London to become a net zero carbon city by 2030; and for the World Health Organisation's air quality guidelines to be achieved as soon as possible.

The consultation proposals are made up of three parts:

- Proposal A: increasing the Congestion Charge from £15 to £18 (and all other related charge levels) so it remains effective in managing traffic and congestion and retains its deterrent effect. The charge was last increased in 2020.*
- Proposal B: introducing a new Cleaner Vehicle Discount (CVD) for electric vehicles (EVs) with the discount level varying by vehicle type. The current 100 per cent CVD will end on 25 December 2025. We are proposing it will be replaced with a new CVD to offer long term targeted support for people and businesses switching to EVs, helping to reduce carbon and improve air quality.*
- Proposal C: changes to the Residents' Discount from 1 March 2027 for new applicants to support residents in switching to EVs.*

Additionally, on behalf of the Mayor, we are consulting on some proposed changes to the Mayor's road user charging guidance. The changes would better reflect the approach we follow when undertaking consultations in comparable circumstances and when setting charges for TfL services, notably fares. A proposed new procedure would allow the Congestion Charge to be increased each year in line with Tube fares, inflation plus 1 per cent or a lower amount. In line with the Mayor's commitment not to increase the ULEZ charge, the new procedure would only apply to the Congestion Charge. The new procedure is intended to ensure that public transport does not become proportionately more expensive than driving in central London. Any non-routine increases would still be subject to consultation.

During the consultation, we will be providing information to London's communities and businesses to support them to participate in the consultation. We will also offer separate briefings for business groups and our stakeholders to discuss and explain how the proposals may affect their sectors.

We would be happy to discuss the consultation further with you. Please respond to this email if you would like to arrange a meeting. The consultation is open now until Monday 4 August .

Sincerely,

[Name]

(b) Consultation closing

Towards the end of the consultation period, we wrote to all stakeholders who we contacted at the beginning to remind them of the ongoing consultation. This email was sent between 29-30 July 2025.

Subject: Proposed changes to the central London Congestion Charge

[Salutation]

I'm writing to remind you that our public consultation on proposed changes to the central London Congestion Charging scheme will close in XX days time on Monday 11th August 2025.

You can read full details about our proposals, and share your views, on our consultation webpage.

During the live consultation period we've already engaged with numerous stakeholders representing business, freight, local community – and many more. One such stakeholder requested additional information to help inform their views on our consultation proposals.

We compiled the information requested and, for openness and transparency, a note containing this additional information has been added to our consultation webpage and is accessible via this link.

If you have already provided a response to our consultation we are offering you the opportunity to amend your original consultation response if you wish.

To do so, please email haveyoursay@tfl.gov.uk and we will account for your revised response in our consultation feedback log. You may do so by reply at any time up to midnight of 11th August, which is a one-week extension beyond the consultation's original planned closing date of 4th August.

We would be happy to discuss the consultation further with you. Please respond to this email if you would like to arrange a meeting. The consultation is open now until Monday 11th August 2025.

Sincerely,

[Name]

Appendix B (iv): Customer Relationship Management emails

(a) Consultation beginning

[Salutation]

We have launched a [public consultation](#) on new proposals for the Congestion Charging scheme to help manage traffic and congestion in central London.

The proposed changes include:

- Increasing the Congestion Charge from £15 to £18 (and all other related charge levels) so it remains effective in managing traffic and congestion and retains its deterrent effect. The charge was last increased in 2020.*
- Introducing a new Cleaner Vehicle Discount (CVD) for electric vehicles (EVs) with the discount level varying by vehicle type. The current 100 per cent CVD will end on*

25 December 2025. We are proposing it will be replaced with a new CVD to offer long term targeted support for people and businesses switching to EVs, helping to reduce carbon and improve air quality.

- *Changes to the Residents' Discount from 1 March 2027 for new applicants to support residents in switching to EVs.*

We also are proposing to change the Mayoral Guidance which sets out how changes to the scheme are made. The changes would better reflect the approach we follow when undertaking consultations in comparable circumstances and when setting charges for TfL services, notably public passenger transport fares.

If introduced, our proposals would begin to come into effect from 2 January 2026.

Our ten-week consultation runs until 4 August 2025, and we want local stakeholders, businesses, and residents to share their views on these proposals.

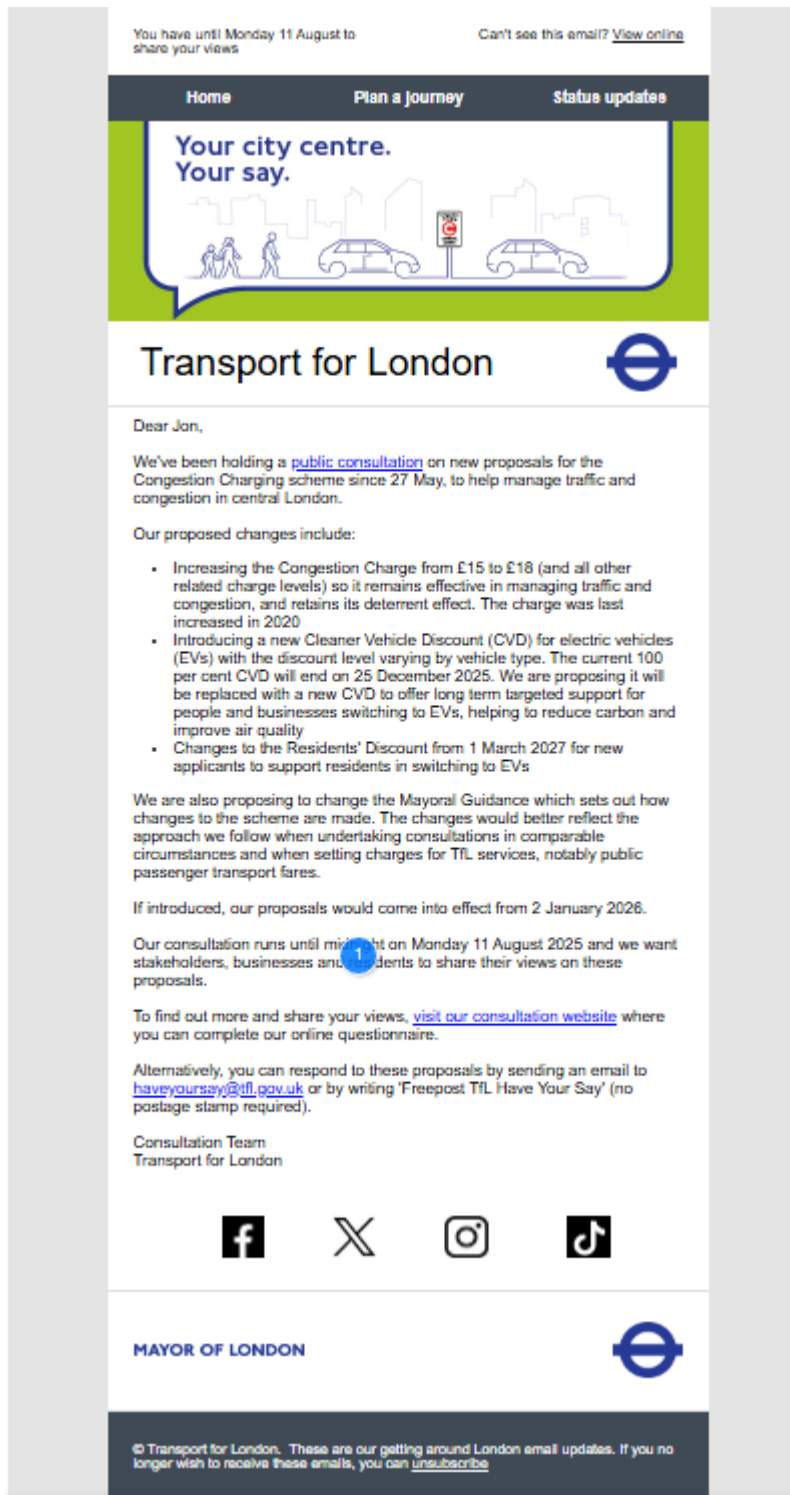
To find out more and to share your views please visit our [consultation website](#) where you can complete our online questionnaire.

Alternatively, you can respond to these proposals by sending an email to haveyoursay@tfl.gov.uk or by writing to 'Freepost TfL Have Your Say' (no postage stamp required).

Kind regards

[Name]

(a) Consultation closing:



Appendix B (v): Consultation poster and flyer

To promote the consultation, we produced a selection of differently sized consultation posters (A4, A3, DR); we also produced smaller sized flyers (A5). We placed copies of posters and/or leaflets at locations in and around the CCZ area in central London, including London Underground (LU) stations, Elizabeth Line stations and local libraries.

(a) Consultation poster:

Your city centre. Your say.

We're proposing changes to the central
London Congestion Charging scheme.

Our proposals include a change in the charge level from £15 to £18*, a new discount for electric vehicles¹ and a change to the Residents' Discount for new applicants. We also propose changes to the Mayoral Guidance which sets out how changes to the scheme are made. If introduced, our proposals would begin to come into effect from January 2026.

For more information and to have your say, please scan the QR code or:

Visit: tfl.gov.uk/congestion-charge-proposals
 Email: haveyoursay@tfl.gov.uk
 Telephone: 020 3054 6037 (call back service)
 Write to: Freepost TfL Have Your Say (Congestion Charge)

The consultation is open now until Monday 4 August 2025.

*For those paying the charge in the three days after travel, the charge would increase from £18 to £21.
¹Zero emission (at the tailpipe) vehicles.

MAYOR OF LONDON

 **TRANSPORT
FOR LONDON**
EVERY JOURNEY MATTERS

(b) Consultation flyer:*Front:**Back:*

Our proposals include a change in the charge level from £15 to £18*, a new discount for electric vehicles¹ and a change to the Residents' Discount for new applicants. If introduced, our proposals would begin to come into effect from January 2026.

For more information and to have your say, please scan the QR code or:

Visit: tfl.gov.uk/congestion-charge-proposals
 Email: haveyoursay@tfl.gov.uk
 Telephone: **020 3054 6037** (call back service)
 Write to: **Freepost TfL Have Your Say (Congestion Charge)**
The consultation is open now until Monday 4 August 2025.

*For those paying the charge in the three days after travel, the charge would increase from £18 to £21.
¹Zero emission (at the tailpipe) vehicles.

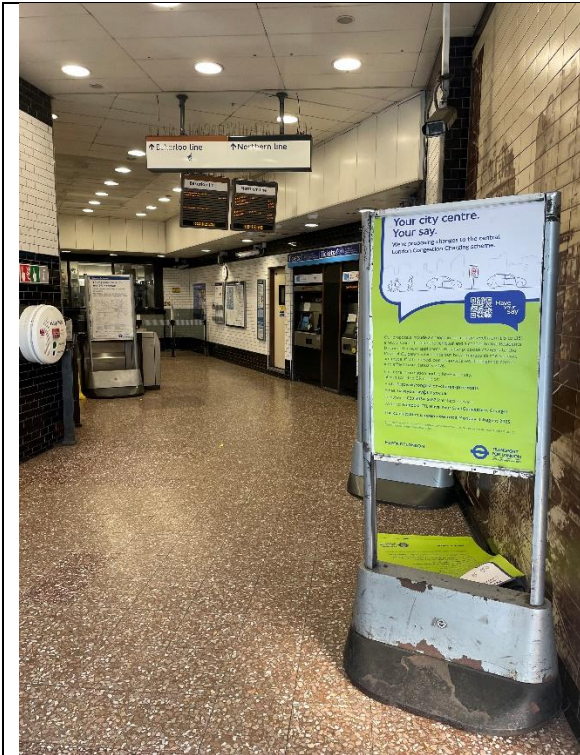


(c) Locations where posters and/or flyers were placed (not exhaustive):

Location name	Location type	Location address
Barbican Library	Library	Silk St, Barbican, London EC2Y 8DS
Barbican Station	LU station	Barbican, London EC1M 6EB
Bermondsey Station	LU station	Jamaica Rd, London SE16 4SN
Blackfriars Station	LU station	Blackfriars Rd, London EC4R 2BB
Bond Street Station	LU station	Oxford St, London W1R 1FE
Bond Street Station	Elizabeth Line station	Oxford St, London W1R 1FE
Camden Town Library	Library	Crowndale Centre, 218 Eversholt St, London NW1 1BD
Canada Water Station	LU station	Deal Porters Way, London SE16
Canary Wharf Station	LU station	3 Heron Quays Rd, London E14 4HJ
Canary Wharf Station	Elizabeth Line station	Canada Square, London E14 5AB
Elephant & Castle Station	LU station	London Rd, Elephant and Castle, London SE1 6LW
Green Park Station	LU station	Piccadilly, London W1J 9DZ
John Harvard Library	Library	211 Borough High St, London SE1 1JA

Liverpool Street Station	LU station	Bishopsgate, London EC2M 4JY
Liverpool Street Station	Elizabeth Line station	Liverpool St, London EC2M 7PP
London Bridge Station	LU station	21 Duke St Hill, London SE1 2SW
Marble Arch Station	LU station	1 Great Cumberland Pl, London W1H 7AL
Marylebone Library	Library	9-11 New Cavendish St, London W1G 9UQ
Mayfair Library	Library	25 S Audley St, London W1K 2PB
Pimlico Station	LU station	Rampayne St, Pimlico, London SW1V 2JA
Shoe Lane Library	Library	Hill House, 1 Little New St, London EC4A 3JR
Southwark Station	LU station	68-70 Blackfriars Rd, London SE1 8JZ
Stockwell Station	LU station	Clapham Rd, London SW9 9AE
Tottenham Court Road Station	LU station	Tottenham Court Road, London W1T 7RJ
Tottenham Court Road Station	Elizabeth Line station	Tottenham Court Road, London W1T 7RJ
Waterloo Station	LU station	York Rd, London SE1 7ND
Whitechapel Library (Idea Store)	Library	321 Whitechapel Rd, London E1 1BU
Whitechapel Station	LU station	Whitechapel Rd, London E1 1BY
Whitechapel Station	Elizabeth Line station	Whitechapel Rd, London E1 1BY
Vauxhall Station	LU station	Lambeth Rd, London SW8 1SS

(d) Images of consultation posters and flyers in a selection of locations



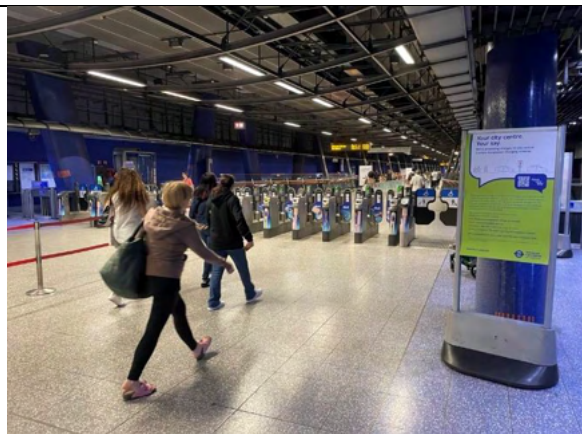
Elephant & Castle Station



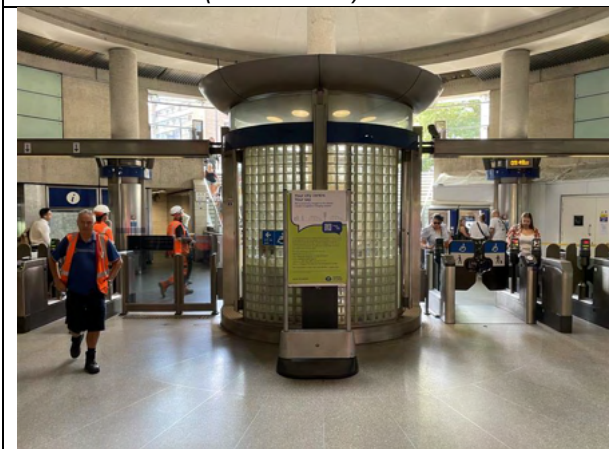
Marble Arch Station



Canada Water (bus station)



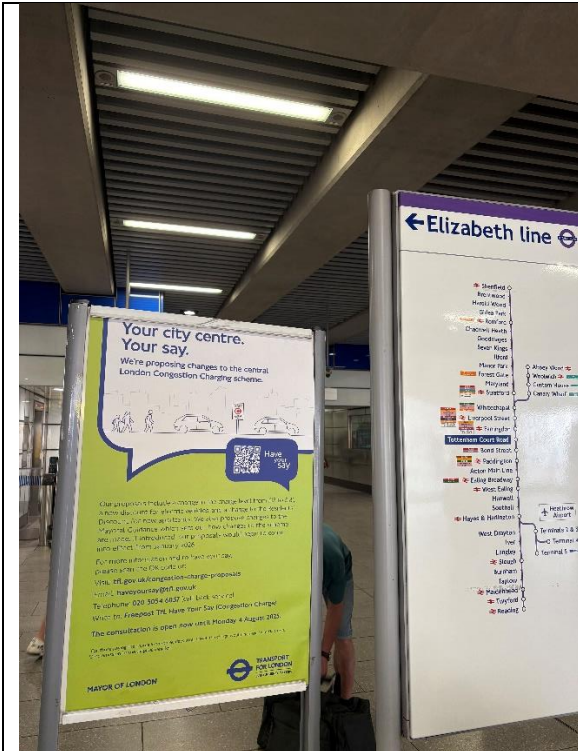
Canada Water (LU station)



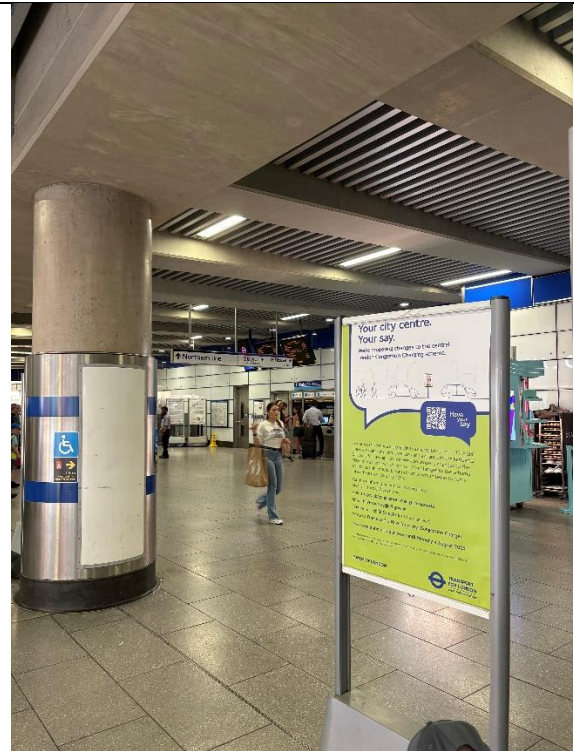
Southwark Station



Marble Arch Station



Tottenham Court Rd Station



Tottenham Court Rd Station



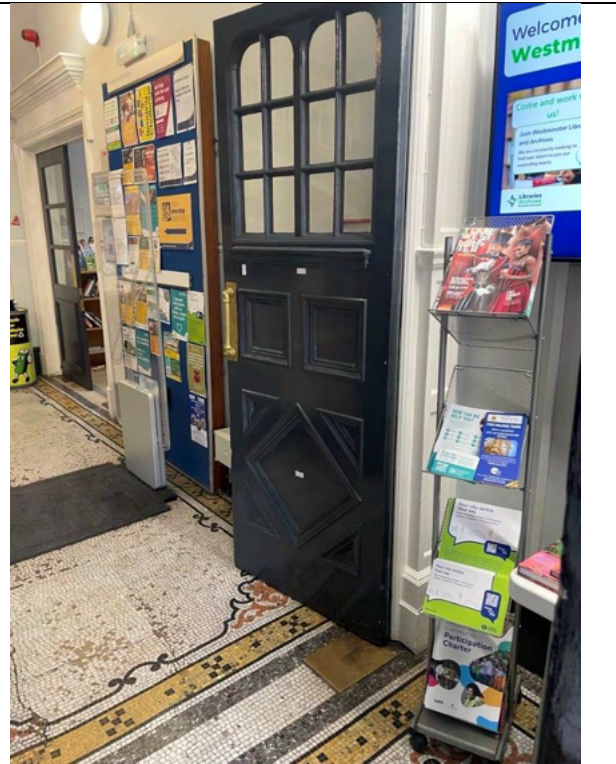
Green Park Station



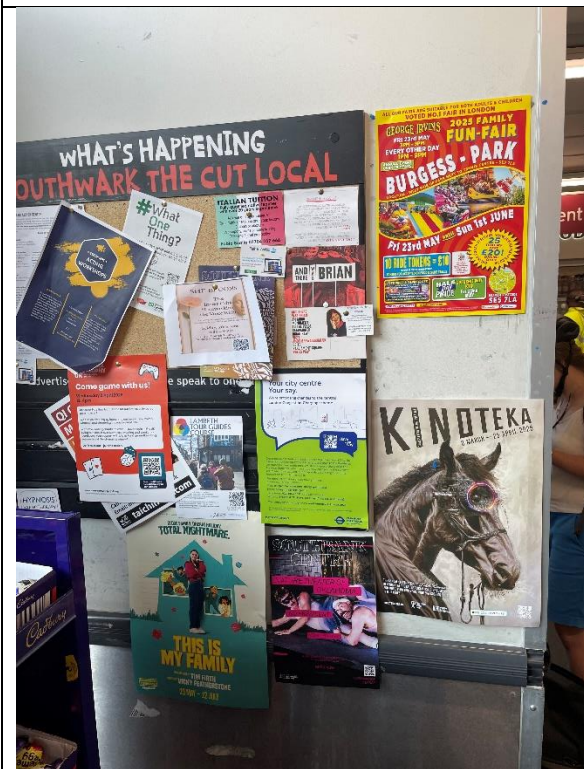
Bond Street Station (?)



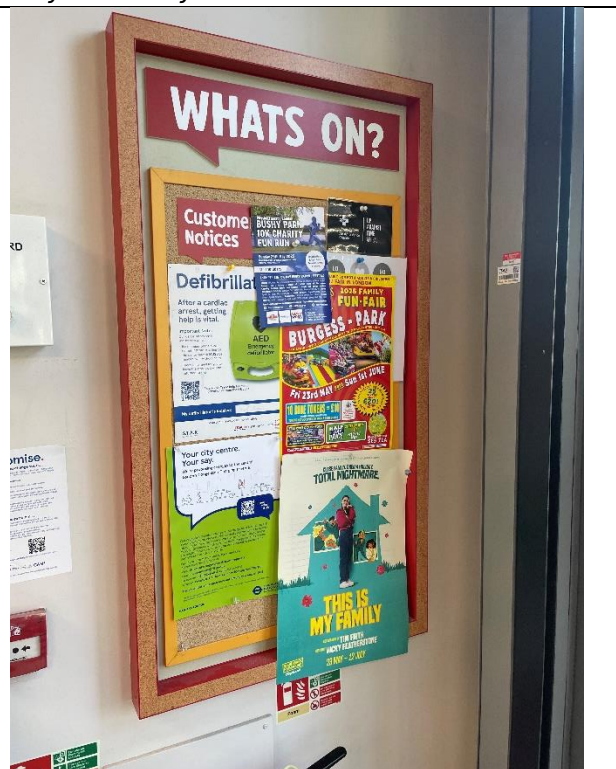
Barbican Station



Mayfair Library



Supermarket noticeboard



Supermarket noticeboard

Appendix B (vi): Metro article

On Thursday 29 May 2025 we published a feature to promote the consultation in the Metro Newspaper:

Travel news / METRO@tfl.gov.uk

brought to you by



TRANSPORT FOR LONDON
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Keeping London moving

Give your views on proposed changes to the central London Congestion Charging scheme in a new consultation from TfL

LONDONERS are being asked to have their say on changes to the Congestion Charging scheme to ease congestion, encourage the uptake of electric vehicles and promote sustainable travel.

The Congestion Charge is in place to manage traffic and congestion in the heart of London at the busiest times of day where road space is most constrained. These new proposals will work to continue managing traffic effectively in central London, and contribute to the Mayor's long-term vision for a cleaner, greener London.

Every year, congestion costs the city millions of pounds. In 2024, vehicle congestion amounted to £3.55 billion, averaging 1042 per driver. This heavily impacts businesses, bus customers and other essential services.

Charging up

Under the new plans, there would be an increase in the daily Congestion Charge level from 15% to 17% to ensure it remains effective in the future. The charge, which would come into effect from January 2026, would be the first increase since 2020.

TfL is consulting on other proposed changes to the Mayor's road user charging guidance, which would make the Congestion Charge to be reviewed each year in line with TfL's target inflation plus one per cent, or a lower amount.

These increases would only apply to the Congestion Charge and not the ULEZ, and would ensure that public transport, slowest because it is proportionately more expensive than driving in central London.

Greener travel

TfL is also proposing a new Cleaner Vehicle Discount from January 2026, with a higher discount for journeys that are made by walking, cycling and public transport, such as those made by hand for commercial purposes.

The discount will be rolled out in two phases. For electric cars registered for Auto Pay, there will be a 25 per cent discount from January 2026, with a 50 per cent discount for electric vans, HGVs, light quadricycles and heavy quadricycles registered for Auto Pay.

This will be followed by a 75 per cent discount for electric cars registered for Auto Pay from March 2026, with a 25 per cent discount for electric vans, HGVs, light quadricycles and heavy quadricycles registered for Auto Pay.

To make it easier for drivers to access the discount, it is proposed that it will be applied automatically from DfLA data, rather than having to manually register and prove a vehicle meets the standards.

TfL is proposing that, from March 2026, while new applications for the 90 per cent Residents' discount will only be able to receive the discount for an electric vehicle, those who are already registered for the discount ahead of this date will not see any changes.

Self-driving, equity issues for transport, and keeping London moving by reducing congestion is what we need for our city and for our economy. The Congestion Charge has been a huge success since its introduction, but we must ensure it is fit for purpose. At the same time we must support Londoners and businesses to use green and more sustainable travel.

That's why we're pleased we're proposing that substantial incentives remain in place for Londoners who switch to cleaner vehicles. We encourage everyone to have their say and respond to the public consultation.

The public consultation is open until Monday August 4.

For more information and to give your views on the scheme, visit the webpage tfl.gov.uk/road-user-charges/consultation

Proposed: The cost of the daily Congestion Charge could rise next year

Step-free planning made stress-free



Fit for the future: Changes to the scheme will ensure it remains effective



For more articles and to keep up to date with TfL announcements, visit tfl.gov.uk

London travel advice: plan your journey now

Check your travel tfl.gov.uk/travel-tools

24-hour travel information 0343 222 1234*

Plan your journey Download the TfL Go app

London Travelwatch London's transport watchdog call 020 3176 2999, or visit www.londontravelwatch.org.uk

*Service and network charges apply. See tfl.gov.uk/terms for details.

Newspapers left on the Tube can jam doors and cause delays to your journey. Take your newspaper with you or put it in a recycling bin.

The views expressed are those of TfL only and are not those of Metro.

Towards the end of the consultation, we included another notice in the Metro Newspaper to remind the public of the ongoing consultation. This was included in the edition of 8 August 2025:

Plan your travel for the weekend

For travel advice to help you make the most of what London has to offer, visit tfl.gov.uk

Check to see if the following engineering works will affect you this weekend. Consider walking or cycling if you can. For updates, visit tfl.gov.uk/travel-tools



Central line

Saturday: No service between Leytonstone and Newbury Park during Friday Night Tube. Use local or rail replacement bus services.

All weekend: No service between Leytonstone and Loughton, and between Woodford and Newbury Park via Hainault, including during Saturday Night Tube. Use local or rail replacement bus services.

London Overground

Suffragette line

Saturday: No service between Gospel Oak and Woodgrange Park. Use Tube or local bus services. A rail replacement bus service will run between Gospel Oak and Seven Sisters, and between Walthamstow Central and East Ham.

Sunday: No service between Gospel Oak and Barking Riverside. Use Tube or local bus services. A rail replacement bus service will run between Gospel Oak and Seven Sisters, and between Walthamstow Central and Barking.

Capping it off

MAKE the most of your travel in London with price caps when you touch in.

Price caps

Daily price caps are cheaper than a Day Travelcard. Once you reach a daily cap, you won't be charged for any further journeys you make that day within the zones you've travelled, as long as you use the same payment method to touch in and touch out each time.

Use the same card or device

Always use the same card or device when touching in and out to ensure all your journeys are calculated as part of the daily cap. For example, if you touch in using your bank card in the morning and then use your Apple watch later in the day, even if it's from the same bank account, they won't both be included towards your daily cap.

Round the clock

The daily cap is calculated over 24 hours, from 4.30am to 4.29am the next day. This means if you have reached your daily cap, you can enjoy a night out after work and travel home after midnight without having to worry about spending more.

Bus and tram daily cap

There's a specific daily cap for buses and trams, so if you travel using buses and trams only, you'll never pay more than £5.25. Plus, with the Hopper fare, you can take unlimited journeys within an hour of first touching in for just £1.75.

Track it

To help keep on top of your travel, you can now track your spend and see when you've reached a cap in the free TFL Go app. For more information, visit tfl.gov.uk/fares

Reduced service on the Windrush line

FROM Monday until Thursday, there will be no service on the Windrush line between Highbury & Islington and New Cross, New Cross Gate and Clapham Junction after 9.15pm each night.

A reduced service will run on the rest of the line. Use Tube, alternative rail,

or local bus services. A rail replacement bus service will run each night between Dalston Kingsland and New Cross Gate, and also between Canada Water and Clapham Junction.

To plan a journey, download the TFL Go app or visit tfl.gov.uk/travel-tools

Bagging a Banksy



Capturing creativity: The Banksy is the first contemporary street art acquired by London Transport Museum

All artwork by Banksy has been carefully moved from its initial location in Croydon and is now in Covent Garden on display at London Transport Museum.

The image, which depicts a rat hanging from the arm of a clock, first appeared on the door of a TFL signal controller cabinet in Croydon in 2019. In front of the artist's pop-up showroom installation, Gross Domestic Product.

The door of the cabinet, which still housed the technology for nearby traffic lights and tram signals, was carefully removed on the day it was discovered by TFL to prevent theft or damage of the artwork, and to ensure the continued safe operation of the transport network.

It has now been mounted on to an identical cabinet body and forms part of London Transport Museum's collection of artworks and vehicles for preservation and display.

Creative caretaker

The museum cares for London's iconic transport history and heritage, sharing stories of the capital's past, present and future. Its exhibits reveal how life in London has been shaped by transport, from engineering innovations to the people who have kept the city moving. Included in its collections and displays is the story of how artists, graphic designers, sculptors and architects have influenced London's identity.

As a recipient of Arts Council England funding, part of the museum's role is to document the contemporary story of London and its transport, preserving history as it is being made for future generations.

This is its first acquisition of a contemporary street artwork by a globally recognised artist like Banksy, and is just one of the many ways the museum is using creativity to tell the story of London's transport.

Adult tickets to visit London Transport Museum cost £25, while children up to 17 go free. To book tickets, visit ltnmuseum.co.uk



Rats: A clock and rat are depicted

Congestion charge proposals



Keeping London moving: A new Cleaner Vehicle Discount is planned

LONDONERS are being asked for their views on planned changes to the Congestion Charge scheme to keep London moving, manage traffic effectively in central London, encourage the uptake of electric vehicles and promote sustainable travel.

TfL is proposing a new Cleaner Vehicle Discount from January 2026 that has a higher discount for journeys that are harder to switch to walking, cycling and public transport, such as those made by vans for commercial purposes.

To make it easier for drivers to access the discount, it is proposed that it will be applied automatically from DVLA data, rather than having to separately register and prove a vehicle meets the standards.

If the changes go ahead, drivers with eligible vehicles will simply need to sign up to Auto Pay to receive the discount.

From March 1 2027, under the new plans, eligible new applicants for the 90 per cent Residents' discount would only be able to receive the discount for an electric vehicle. Those who are already registered for the discount ahead of this date will not see any changes.

The plans also include a change in the charge level from £15 to £18 so it remains effective in the future. The charge was last increased in 2020.

The consultation closes on Monday, August 11. For more information and to give your views, visit the website at tfl.gov.uk/congestion-charge-proposals

For the latest news and help planning your journey, visit tfl.gov.uk

Appendix B (vii): Press release and media reaction

At the start of the consultation on 27 May 2025, we published a press release to promote the launch of the consultation. This is provided below and is also available on our website here:

<https://tfl.gov.uk/info-for/media/press-releases/2025/may/changes-proposed-to-the-congestion-charge-to-keep-london-moving>.

(a) Press Release:

Changes proposed to the Congestion Charge to keep London moving

"Keeping London moving by reducing congestion is vital for our city and for our economy " – Seb Dance, Deputy Mayor for Transport

New Cleaner Vehicle Discount proposed in new public consultation incentivising the use of cleanest possible vehicles while managing traffic and congestion

- *Proposal to set the daily charge at £18 from January 2026 to ensure it remains effective - the first increase since 2020*
- *Analysis shows that there will be more than 2,200 additional vehicles on an average weekday without these proposed changes**
- *TfL is proposing that, from March 2027, and for new applicants only, the Residents' discount will be available only for electric vehicles*
- *Proposal to move to incremental annual increases to the Congestion Charge as with public passenger transport fares*

Transport for London (TfL) is today (Tuesday 27 May) seeking views on a number of changes to the Congestion Charge to help keep London moving, encourage the uptake of electric vehicles and promote sustainable travel across the capital.

*Every year, congestion costs London billions of pounds - in 2024 alone vehicle congestion cost the capital £3.85 billion, averaging £942 per driver**. This heavily impacts businesses, bus customers and other essential services. The charge is in place to manage traffic and congestion in the heart of London - the central one per cent of the city - at the busiest times of day where road space is most constrained. TfL is consulting on changes to the Congestion Charging scheme to ensure that it remains efficient at reducing congestion for years to come, so that central London can continue to thrive.*

These new proposals, launched in a public consultation starting today until 4 August 2025, will work to continue managing traffic effectively in central London, and contribute to the Mayor's long-term vision for a cleaner, greener London, through increased uptake in electric vehicles and more journeys taken by public transport.

Achieving this long-term vision will require cutting congestion further and a greater shift away from petrol and diesel vehicles towards walking, cycling and public transport. It will also require, for those journeys that are taken by car or van, increased adoption of electric vehicles.

TfL has assessed the proposals in this consultation against a 'do nothing' scenario, which would include the end of the current version of the Cleaner Vehicle Discount (CVD) on 25 December 2025. Without TfL's proposals, it estimates next year alone around 2,200 more vehicles would use the Congestion Charging Zone on an average weekday during charging hours - leading to increased congestion and undermining the current scheme.

To provide further support for people and businesses who have invested in, or are considering switching to an electric vehicle, TfL is proposing a new CVD from January 2026 that has a higher discount for journeys that are harder to switch to walking, cycling and public transport, such as those

made by vans for commercial purposes. The discount will change over the timeframe outlined in the consultation to give support to those making the green transition, while also keeping London moving.

This builds on an ongoing package of support from City Hall for businesses to switch to zero emission, including the Mayor's scrappage scheme which has provided financial assistance to help eligible London residents, businesses and charities, to scrap, donate or retrofit vehicles that do not meet the Ultra Low Emission Zone (ULEZ) emissions standards. Delivered jointly by the Mayor and TfL, the Mayor's Air Quality fund (MAQF) has provided boroughs with £27 million in funding, matched by £20 million in funding/resources from boroughs and partners to help projects working to improve air quality in the capital. This is alongside action to increase the number of public Electric Vehicles (EV) charging points in the capital to 40,000 by 2030.

The proposed new discount will be introduced in two phases:

From 2 January 2026:

- 50 per cent discount for electric vans, Heavy Goods Vehicles (HGVs), light quadricycles and heavy quadricycles registered for Auto Pay*
- 25 per cent discount for electric cars registered for Auto Pay*

From 4 March 2030:

- 25 per cent discount for electric vans, HGVs, light quadricycles and heavy quadricycles registered for Auto Pay*
- 12.5 per cent discount for electric cars registered for Auto Pay*

To make it easier for drivers to access the discount, it is proposed that it will be applied automatically from DVLA data, rather than having to separately register and prove a vehicle meets the standards. If the changes go ahead, drivers with eligible vehicles will simply need to sign up to Auto Pay to receive the discount.

The Congestion Charging Scheme is constantly kept under review and the charge level has been unchanged since 2020.

To ensure it remains effective, it is proposed that the charge level is increased from £15 to £18 from 2 January 2026 - the first increase in five years. Central London is already one of the world's best-connected places, helping to support sustainable travel; zone one alone has 71 train stations and with 700 bus routes serving the London area, people living, working and visiting in the zone have many sustainable alternatives to driving. London's Cycleways total network is now more than 400km, quadrupling in size from just 90km in 2016.

From 1 March 2027, it is proposed that eligible new applicants for the 90 per cent Residents' discount will only be able to receive the discount for an electric vehicle. This will help to incentivise the shift to the cleanest possible vehicles and give people moving into the zone time to plan ahead. Those who are already registered for the discount ahead of this date will not see any changes, reflecting that they might be reliant on their current form of transport.

TfL is also consulting on some proposed changes to the Mayor's road user charging guidance, which would allow the Congestion Charge to be increased each year in line with Tube fares, inflation plus 1 per cent or a lower amount. These increases would only apply to the Congestion Charge and not the ULEZ. The new proposed procedure would create consistency with the approach that applies when public passenger transport fares are set and would ensure that public transport does not become proportionately more expensive than driving in central London.

When the Congestion Charge was introduced in 2003, there was a 30 per cent reduction in congestion within the zone and a 15 per cent reduction in circulating traffic in the first year. It also boosted bus travel by 33 per cent and contributed to a 10 per cent shift in people using public

transport or active travel. Analysis shows there would have been three million additional journeys by car across London in 2019 without the changes TfL has introduced to encourage more sustainable travel patterns over the last couple of decades, of which the Congestion Charge was a critical first step.

Seb Dance, Deputy Mayor for Transport, said:

'Keeping London moving by reducing congestion is vital for our city and for our economy.'

'The congestion charge has been a huge success since its introduction, but we must ensure it is fit for purpose.'

'Sticking to the status quo would see around 2,200 more vehicles using the congestion charging zone on an average weekday next year.'

'At the same time we must support Londoners and businesses to use greener and more sustainable travel. That's why I'm pleased we're proposing that substantial incentives remain in place for Londoners who switch to cleaner vehicles.'

'We encourage everyone to have their say and respond to the public consultation.'

Christina Calderato, TfL's Director of Strategy, said:

'Since it was introduced in 2003, the Congestion Charge has been hugely successful in supporting the move to more walking, cycling and public transport and encouraging the uptake of the cleanest vehicles. With these proposed changes we want to make sure it continues to be effective in managing traffic and congestion in central London while providing ongoing support to those who need to drive in the zone to make the switch to an electric vehicle. I would encourage people to respond to the consultation to help shape our plans.'

Oliver Lord, UK Head of Clean Cities Campaign, said:

'We've record numbers of polluting diesel vans in the UK so I'm thrilled the Mayor is helping to reward businesses that invest in greener fleets. By prioritising electric and pedal powered freight, we will all benefit from cleaner air and quieter streets.'

'There's no use having a Congestion Charge that nobody pays so I think today's proposals strike a fair balance between its core aims around traffic and congestion, whilst also advancing our environmental goals.'

Izzy Romilly, Sustainable Transport Campaigner at climate charity Possible, said:

'To tackle the climate crisis, health inequalities, and air pollution, we have to tackle London's high levels of traffic.'

'We've got to look for the best and fairest ways to discourage unnecessary car trips, while also making sure that people who need to drive can switch to fully electric vehicles.'

'Getting the balance right on the congestion charge discount for EVs means incentivising the switch to electric, while discouraging car journeys that could be taken in a different way.'

'The bigger picture is that we need to make space for bus lanes, safe cycle paths, and walkable streets so that we can bring a lower traffic future to life - tackling air pollution, protecting the climate and creating places that are better to live in.'

Sophie O'Connell, Senior policy adviser at the Green Alliance, said:

'It's great to see London continuing its leadership in encouraging the switch to cleaner vehicles through the proposed changes to the Clean Vehicle Discount. With larger incentives for electric vans and delivery vehicles, which have further to go in decarbonising, these changes target the right'

areas. The new measures send a clear signal: driving a polluting vehicle through central London should not be cheaper than taking public transport, making the cleaner choice the obvious one while supporting both public health and the environment.'

**p28 of consultation supplementary information*

***Source: 'INRIX 2024 Global Traffic Scorecard: London most congested city in Europe; congestion costing the UK £7.7 billion', INRIX, 6 January 2025, <https://inrix.com/press-releases/2024-global-traffic-scorecard-uk> (accessed 23 April 2025)*

Notes to editors:

- *The public consultation runs from 27 May to 4 August 2025 and can be access here: <https://tfl.gov.uk/congestion-charge-proposals>*
- *Discounts and exemptions for the Congestion Charge can be found here: <https://tfl.gov.uk/modes/driving/discounts-and-exemptions>*
- *TfL proposes to increase the charge to £18 from 2 January 2026. The daily charge is currently £15 if you pay in advance or on the same day, or £17.50 by midnight of the third day after travel. For those paying the charge by midnight of the third day after travel, the charge would increase from £17.50 to £21*
- *The charge was last increased, to £15 in 2020. An increase to £18 in January 2026 is a below inflation increase for the period since the charge was last changed*
- *Those eligible for the residents' discount can register for the discount before March 2027 to retain eligibility for any vehicle type*
- *The Mayor committed to not increasing the cost of the ULEZ charge. The proposed new procedure would allow for routine annual increases to be considered in respect of the Congestion Charge. Any non-routine increase would be subject to public and stakeholder consultation*
- *The current CVD comes to an end on 25 December 2025 and it is proposed that the new scheme comes into force on 2 Jan 2026 due to the historical arrangement of the Congestion Charge not operating during the Christmas and New Year period*

(b) Media reaction to press release

At the start of the consultation on Tuesday, 27 May 2025, we published a press release to announce the consultation launch and describe the proposals. The press release was published to TfL's website and shared with media partners. The press release can be accessed online at the following link, or found in Appendix ?? of this document:

- <https://tfl.gov.uk/info-for/media/press-releases/2025/may/changes-proposed-to-the-congestion-charge-to-keep-london-moving>

After the press release was published, it was reported on by a number of media outlets including:

Broadcast Headlines (27 May 2025)

- Greatest Hits Radio (13:30 broadcast time)
- Capital Radio (15:57 broadcast time)

- BBC One (18:00 broadcast time)
- Heart London (18:00 broadcast time)
- ITV Evening News (18:30 broadcast time)
- Kerrang Radio (19:00 broadcast time)
- BBC Radio London (19:00 broadcast time)
- LBC Radio (21:50 broadcast time)

Interviews

- BBC Radio London – Alex Williams interview with Shay Kaur Grewal (27/05/2025, 17:05)
- BBC Radio London – Oliver Lord interview with Shay Kaur Grewal (27/05/2025, 17:15)
- BBC Radio London – Graham Bengie interview with Shay Kaur Grewal (27/05/2025, 17:20)

Print coverage (clipping in appendices):

- The Times, pg.18
- The Daily Telegraph, pg.8
- Financial Times, pg.3
- City AM, pg.7

Online Coverage

National/International:

- BBC – [Congestion Charge set to rise by 20% to £18](#)
- BBC – [Mayor urged to chase up £370m in unpaid Ulez fines](#)
- Bodyshop Mag – [Congestion charge in London set for 20% hike](#)
- Daily Mail – [London Congestion Charge to increase 20% to £18 a day next year](#)
- Financial Times – [London congestion charge set to rise by 20% under TfL plans](#)
- GB News – [Motorists to see Congestion Charge increase to £18 per day under bold new plans - 'Hugely successful'](#)
- ITV – [Sadiq Khan to scrap electric vehicle congestion charge exemption as prices to rise](#)
- Sky News – [London congestion charge could rise to £18 a day under new proposals](#)
- The Telegraph – [Sadiq Khan to end congestion charge discount for new residents without EVs](#)
- The Times – [TfL congestion charge to hit £18 a day as mayor goes greener](#)
- Yahoo – [Transport for London proposes hike in congestion charge - here's by how much](#)

Pan-London/Local:

- London Standard – [The Congestion Charge will rise from £15 to £18 next year under plans announced by Transport for London](#)
- MyLondon – [Transport for London proposes hike in congestion charge - here's by how much](#)
- City AM – [Transport for London proposes 20 per cent hike to Congestion Charge](#)
- Southwark News – [TfL seeking to increase Congestion Charge on motorists driving through central London](#)

Blogs:

- IanVisits – [TfL proposes a below inflation rate rise in London's Congestion Charge](#)
- Bloomberg – [EV Drivers to Pay Discounted London Congestion Charge From 2026](#)

- Londonist – [TfL Plans To Increase The Congestion Charge](#)

Appendix B (viii): London Gazette notice

At the start of the consultation, we arranged for a notice of the consultation commencement to be published in the London Gazette. This was included in their online edition on 27 May 2025 and in their print publication on 28 May 2025:

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Notice details

Type:
Other Notices
[> Other Notices](#)

Publication date:
27 May 2025, 17:20

Edition:
The London Gazette

Notice ID:
4893898

Notice code:
2301

Issue number:
64744

Page number:
10849

Other Notices

Transport for London

GREATER LONDON AUTHORITY ACT 1999

CONGESTION CHARGING

TRANSPORT FOR LONDON, as the charging authority, hereby gives notice that it has made an Order under Schedule 23 to the Greater London Authority Act 1999 entitled the Greater London (Central Zone) Congestion Charging (Variation) Order 2025 (the Congestion Charging Variation Order).

The Congestion Charging Variation Order amends the Greater London (Central Zone) Congestion Charging Order 2004 which was made by Transport for London on 30 September 2004, confirmed with modifications by the Mayor of London on 27 October 2004 and has subsequently been varied.

The Congestion Charging Variation Order contains the following proposed changes to the Congestion Charging Scheme:

- 1) increase the level of the Congestion Charge from £15 to £18 (and make consequential increases to the related charge levels) from 2 January 2025;
- 2) introduce a new Cleaner Vehicle Discount (CVD) for electric vehicles on 2 January 2025 with the discount level varying by vehicle type: 50% for electric vans, heavy goods vehicles and quadricycles and 25% for electric cars. The discounts would be halved on 4 March 2030. Payment would be by auto pay only;
- 3) amend the residents' discount for residents who apply after 1 March 2027 so that the discount will only apply in respect of an electric vehicle. Residents who have registered for the discount prior to 1 March 2027 would retain their discount regardless of their vehicle's fuel type, now and in the future, provided they continue to meet the discount's other eligibility criteria and renew their registration each year.

In addition, on behalf of the Mayor, Transport for London is consulting on some proposed changes to the Mayoral Guidance on the exercise of its road user charging powers. The changes would better reflect the approach TfL follows when undertaking consultations in comparable circumstances and when setting charges for TfL services, notably public passenger transport fares.

Transport for London invites the making of representations on, or objections to, the proposed changes to the Congestion Charging Scheme and to the Mayoral Guidance. Any representations that are submitted must be made in writing, specify the grounds on which they are made and be received by Transport for London by 4 August 2025. Transport for London also offer a callback service where we can transcribe a consultation response on behalf of an individual – further details are provided below.

Copies of the Variation Orders and other supporting documents may be inspected during business hours at the offices of Transport for London located at Palestra, 197 Blackfriars Road, London, SE1 8NU (Please ask for David Mulligan, Consultation Manager). This information is also available on: <https://tfl.gov.uk/congestion-charge-proposals> or may be obtained by emailing haveyoursay@tfl.gov.uk. Representations may be sent to this email address, by post to Freepost TfL Have Your Say (no stamp required) or via our telephone call back service (020 3054 6037. Service and network charges may apply. See tfl.gov.uk/terms for details).

Dated: 27 May 2025

Andy Lord
Commissioner

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Appendix B (ix): Advertisement in local newspapers

During the consultation period, we published advertisements to promote the consultation in a number of local newspapers. We focussed our campaign to local papers that focussed on boroughs that either host the CCZ or are in close proximity to it.

Kilburn Times:

kilburntimes.co.uk
July 24, 2025
NEWS 3

Human trafficking gang jailed

People smugglers jailed after migrants found screaming for help in trailer

By HOLLY BRECHER
holly.brecher@kilburntimes.co.uk

SEVEN members of a people smuggling ring that loaded migrants into lorry trailers for dangerous journeys from the UK to France have been jailed.

Videos found on the phone of one of the ringleaders revealed migrants screaming for help in the back of a locked trailer.

The operation, run from London, was dismantled by the National Crime Agency (NCA), after months of investigation.

A total of 19 members of the gang have been brought to justice following an extensive NCA investigation.

The ringleader, 41-year-old Algerian national Azize Benabib, of Willesden Lane, Brent, was sentenced at Isleworth Crown Court to 12 years and 11 months in prison on July 17.

He and his accomplices brought North African migrants into the UK on tourist visas, only to pack them into lorries and attempt to smuggle them into France via Dover, charging up to £1,200 for the perilous journey.

Investigators identified more than 20 separate smuggling runs between February and October 2023.

The gang loaded hundreds of migrants, including children as young as five, into refrigerated and non-refrigerated lorry trailers.

The co-conspirators, including Mohammed Bechkit, 36, of Leopold Road, Wimbledon; Mahmoud Haidous, 53, of Oakley Road, Islington; Abed Karrouz, 30, Amor Ghabbouri, 32, of Maida Hill, and Mohamed Abdelhadi, 50, of Inders

wick Road, Hammersmith, organised the runs and hired willing drivers.

The network's facilitator, Mohamed Bouriche, 43, of Redmond Mews, Hayes, was responsible for transporting people to rendezvous locations to be moved into the lorries.

The NCA launched its investigation on February 21, 2023 after 58 migrants were discovered by French border police at Calais, hidden inside a lorry that had arrived from the UK.

Repeated attempts to smuggle people were thwarted by NCA surveillance teams, with officers intercepting lorries at the UK border, rescuing the migrants inside and arresting the drivers.

In one attempt on September 6, 2023, 29 migrants, including women and children, were loaded into an airtight refrigerated lorry trailer at a lay-by in Sandwich, Kent.

NCA officers intervened to rescue the migrants, some of whom, including a child, required medical attention.

By early 2024, the NCA had identified key members at all levels of the organised crime group.

The ringleaders were arrested in a co-ordinated strike at properties in north London on March 30, 2024.

Videos of migrants travelling in lorry trailers were found on Bechkit's phone, including one where they could be heard banging on the sides of the trailer, screaming and crying for assistance.

Bechkit was jailed for 10 years and four months, Haidous received 12-and-a-half years, Karrouz eight years and 10 months, Ghabbouri nine years, Abdelhadi seven years and three months, and Bouriche seven-and-a-half years.

NCA senior investigating officer John Turner said: "These smugglers had no care for the safety or wellbeing of the people they crammed into lorry trailers – their only concern was making money."



Seven men have been jailed

Image: NCA

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Telephone: 020 3054 6037 (call back service)

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Zero emission (or 'tailpipe') vehicles.



TRANSPORT FOR LONDON
EVERY JOURNEY MATTERS

Camden New Journal:

Camden New Journal Thursday 24 July 2025

Support the CNU by signing up to: newjournal.substack.com

NEWS 7

down!' Threat shop row Tory

Shiva Tiwari appears on shop CCTV pushing an employee at Costcutter in West Hampstead as the row over ID for a parcel escalated

Left: Mr Tiwari is welcomed into the Tory party by leader Steve Adams



"I feel for the staff who I know have been very upset by this. Shop workers already too often face abuse – it is unacceptable from the public and even more so from an elected member." Liberal Democrat councillor Tom Simon, the leader of the opposition, added: "Losing your cool is one thing, but abusing your

authority to me suggests a very poor attitude towards public service. The comments – being a councillor – are shocking and I think bring the office of councillor into disrepute." Police had been called to the shop but officers said the matter was resolved at the scene without the need for further action.

Since the fast-moving chain of events on Thursday, some residents have told of similar difficulties picking up parcels from the shop – but staff say they have no choice but to follow stricter ID rules set by transit company UPS. Mr Bhimjiyani said it handled 250 parcels a day – many of them packages connected to

sales on the second-hand clothes selling website Vinted. "Even the 14-year-olds around here understand about the ID," he said.

"I'm still flabbergasted by the behaviour of this councillor. I spend more time here than in my home. If you are going to come in, behave."

Mr Tiwari, whose day job is in finance, was first elected in West Hampstead seven years ago as a Labour party candidate.

When people ask about his attendance record at the council over this time, he insists he has been the hardest working councillor for the ward.

The two Labour councillors still there, Sharon Hardwick and Nazma Rahman, wrote to the *New Journal* this week to condemn his actions.

Mr Tiwari had delivered one of the nomination speeches when Cllr Rahman was chosen as the Mayor of Camden three years ago, but their letter said: "We were appalled to learn of the threats and aggression directed at their team."

"Such behaviour is unacceptable from any member of the public – and utterly indefensible from an elected councillor."

While I have your attention... Owner issues crime warning

THE owner of a shop at the centre of the parcel rage row said he was hoping politicians and police would finally start listening to him, writes Tom Foot.

Rakesh Bhimjiyani – whose family have run the shop for almost four decades – said he had for at least seven years filled reports about rising crime and falling standards in Finchley Road.

He said: "I am hoping that first of all: If there are any more councillors who think they can throw their weight around they will now think they can't do that."

"The other thing is that if I have become a bit notorious for them, even for a short time, I may be able to achieve what I have been trying to do for the last seven years. I have been reporting many things for ages, and



nobody does anything about it."

Mr Bhimjiyani (pictured above) said his main concern is "north of Swiss Cottage on Finchley Road" where he said small groups were running amok. He claimed some other shopkeepers could be fuelling the problem by buying stolen goods – including bottled alcohol from supermarkets.

Mr Bhimjiyani also criticised a decision to remove the loading bay outside his shop, failure to stop a fly-tipping hotspot on the corner of Lilthorpe Road and the "crazy" location of a National Express bus stop in a highly congested section of the high road.

He said he used to keep a German Shepherd dog called Smokey in the store and has in the past kept a baseball bat in case of trouble.

Known as "Uncle Rak", his family came to this country with only £50 after being forced out of Uganda by Idi Amin in 1972.

Initially they had lived in Mitcham but later moved to Watford, where Mr Bhimjiyani said he was happy to go on the record saying he voted for the Liberal Democrats.

"Where I live, their policies are very sensible," he said.

Well known in the community close to Finchley and Finsbury Park overground station, he said his branch of Costcutter had over the years served many celebrities including pop star Kylie Minogue, actors Dame Emma Thompson and Claire Foy, Culture Club singer Boy George and more recently athletics legend Dame Jessica Ennis.

Your city centre. Your say.

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Have your say

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TRANSPORT FOR LONDON
EVERY JOURNEY MATTERS

First inspection for primary

Ofsted rules 'pupils thrive' at school with good and outstanding qualities

By GIANNI CIRILLO
gianni.cirillo@eastlondonadvertiser.co.uk

A Canary Wharf primary school "fostering kindness and empathy" has been praised by Ofsted following its first inspection.

Mulberry Wood Wharf Primary School in Brunan Street was visited by the education watchdog in May and the findings were made public on June 23.

It was deemed 'good' in the categories of 'quality of education' and 'leadership and management' and 'outstanding' in 'behaviour and attitudes', 'personal development' and 'early years provision'.

Inspectors found that "pupils thrive" here and prove themselves to be "caring citizens who know how to keep themselves safe and understand they have a role to play in looking after others".

The school has a mantra - "When someone is without a smile, you give them one of yours" and inspectors claimed this sums up its approach to "fostering kindness and empathy".

The report said pupils are taught the learning habits of creativity, resilience and respect and new pupils who join part way through are made equally welcome because the school fosters "inclusivity" "exceptionally well".

The school opened in September

2023 with one reception class and now has two reception classes, two year one classes and one year two class.

As well as praising the behaviour of pupils and the ethos of the school, Ofsted described the curriculum as "ambitious and well sequenced".

Teachers were found to have strong subject knowledge and present information clearly.

Reading is a priority at Mulberry Wood Wharf, Ofsted said, and the youngest children enjoy acting out stories they are learning to perform at Mulberry Arts Festival.

"They use newly acquired language from the story "with precision" when performing to an audience.

Inspectors also reported that staff quickly identify any pupils who need additional help and put in place a range of "immediate and effective support".

This results in pupils, including those with special educational needs and/or disabilities (SEND), becoming "fluent, confident and enthusiastic readers".

Executive headteacher Sarah Jane said: "We are absolutely delighted with the outcome of our first Ofsted inspection.

"Since opening, we've worked tirelessly to build a school where every child is known, nurtured and inspired, and we're proud that Ofsted recognised this."



This is the school's first Ofsted inspection

Image: Mulberry Wood Wharf Primary School

Probe after park rape reported

AN investigation is underway after a woman reported being raped at a park in Spitalfields.

Metropolitan Police officers were called to Allen Gardens, along Buxton Street and Cole Street, in the early hours of July 18. A woman in her 30s reported that she had been raped.

Allen Gardens was cordoned off from July 18 to July 20 while the investigation got underway.

There have been no arrests at this stage and enquiries are ongoing.

A spokesperson for the Met said: "Police are investigating after a woman in her 30s reported that she had been raped in Allen Gardens, Tower Hamlets in the early hours on Friday, 18 July."

"No arrests have been made as of yet and enquiries remain ongoing."

Anyone with information is asked to contact police by calling 101 or online, quoting CAD 988/12JULY.

Alternatively, you can contact the independent charity Crimestoppers anonymously on 0800 555 111.

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²Zero emission (at the tailpipe) vehicles.



TRANSPORT
FOR LONDON
EVERY JOURNEY MATTERS

Greenwich and Lewisham Weekender:

LIFESTYLE

Green spaces around Greenwich



the beauty of the spaces all year round.

This detailed approach meant each book takes around two years in the making, as Candy had to visit each park multiple times to get photos and give the parks justice in her description.

She also worked closely with local volunteering groups and Friends of the parks, who shared their unique perspectives with Candy and she showcased the work they are doing.

We asked Candy what her advice would be for someone who wants to explore Greenwich but doesn't know where to start. She said: "There are many more interesting spaces in addition to Greenwich Park and people don't

often know much beyond that.

"Everyone enjoys Greenwich Park, but there are lots more places worth investigating. It totally depends on how you're feeling, whether you want woods, trees, wide open spaces, or a long versus short walk."

"There are also a suit every mood in Greenwich."

Candy is currently working on a new book titled Green Southwark which will explore the overlooked green spaces from London Bridge down to Dulwich.

The books are available from Amazon and Waterstones but are also in the Greenwich and Lewisham library system.

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TRANSPORT
FOR LONDON
EVERY JOURNEY MATTERS

TV stars join authors at book festival

A stellar line up of literary stars and TV faces has been lined up for The Queen's Park Book Festival in August.

Breakfast TV presenter Naga Munchetty and the BBC's Chief International Correspondent Lyse Doucet are among the names appearing in the North West London park across the two-day festival.

The 2025 line up also includes The Line of Beauty author Alan Hollinghurst; a rare in person appearance by Buddha of Suburbia author Hanif Kureishi; local literary star Zadie Smith; and actress Tuppence Middleton, who openly chronicles her experiences with OCD in her memoir Scorpions.

For food fans there's the added bonus of seeing cook and restaurateur Yotam Ottolenghi alongside Ben Lippett and Wahaca founder and MasterChef winner Thomasina Miers.

Taking place in tents in the picturesque park, the festival

Bridge Galton

bridge.galton@newsquest.co.uk

blends village fête charm with conversations from some of the most prestigious literary minds and performers today.

Topics range from fiction and memoir to current affairs, history and cookery - as well as family events.

Naga Munchetty draws on her personal experience battling adenomyosis, and exposes the truth about how women seeking help with their health have been repeatedly failed in It's Probably Nothing.

Booker prizewinner Alan Hollinghurst discusses his recent novel Our Evening, a portrait of modern England through the lens of one man's acutely observed experience.

Following an accident that left him paralysed, Hanif Kureishi dictated an extraordinary series of



Local author Zadie Smith returns to the festival

dispatches to his family from his hospital bed, which formed his life-affirming memoir Shattered.

And Lyse Doucet takes the story of the Intercontinental Kabul to weave a rich history of modern Afghanistan in her forthcoming book The Finest Hotel in Kabul: A People's History of Afghanistan.

Other stand-out events include acclaimed novelist KJ de Waal in conversation with journalist Alex Clark about her new novel The

Best of Everything, a tender and uplifting story of family, love and kindness.

And Zadie Smith returns to the festival alongside poet and novelist Nick Laird to share their new children's picture book, In the Wild.

The Queen's Park Community Tent is free to all and dedicated to nurturing local talent and artists, and partnering with local charities. Queen's Park Voices features writers, poets and playwrights

from the area followed by brilliant panels with the Brent Biennial.

On Sunday another local hero Simonetta Wenkert who runs Ida Italian restaurant in Kilburn Lane talks about her book Ida At My Table, which describes opening a neighbourhood dining spot without any prior experience.

The Queen's Park Book Festival runs August 30 and 31. Further details at www.queensparkbookfestival.co.uk

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TRANSPORT
FOR LONDON
EVERY JOURNEY MATTERS

newhamrecorder.co.uk

July 23, 2025

NEWS 11

Park reveals summer events

Whole host of family activities on offer at Queen Elizabeth Olympic Park

By JOE BENHAM

joe.benham@newhamrecorder.co.uk

QUEEN Elizabeth Olympic Park has unveiled a host of activities for the summer.

Visitors can explore the V&A East Storehouse, which offers access to more than 250,000 objects, all available through the free Order an Object service.

The World Press Photo Exhibition at MPH Gallery, Here East, will be open until August 30 for those interested in photojournalism.

Fans of the virtual band Gorillaz can celebrate their 25th anniversary at the Hooze of Kong exhibition at the Copper Box Arena from August 8 to September 3.

Art enthusiasts can enjoy a series of abstract painting workshops at Barge East's rooftop bar in Hackney Wick throughout the summer.

Beach tennis will be available for seven weeks from July 26, courtesy of Bola Beach Tennis.

Young people aged 12 to 17 can attend the East Summer School, which offers a week of free, interactive workshops from industry experts from July 28 to August 8.

The park will host UK Black Pride on August 10, the world's largest free celebration for LGB-

BTQ+ people of African, Asian, Caribbean, Latin American, and Middle Eastern descent.

The Dancing City event will return on September 6, showcasing a variety of dance styles in the park's outdoor spaces.

The park also offers a range of year-round activities, including boat tours, restaurants, trail guides, swim pedalos, and Zip World.

The V&A East Storehouse is open daily from 10am to 5pm, with late-night openings every Thursday and Saturday until 10pm.

Sadler's Wells East has a variety of performances lined up for the summer, including an exploration of nightclub culture and Akash Odedra's fusion of Sufi Kathak and Islamic poetry.

The park also offers a mix of food and drink destinations and outdoor activities.

These include Draughts, the Big Market at Riverside East, Hackney Bridge, and Barge East.

Visitors can also enjoy guided boat tours, various play parks, free trail guides, and Zip World London at the ArcelorMittal Orbit.

For sports and fitness enthusiasts, the London Aquatics Centre is open to the public seven days a week.



Sadler's Wells East has many performances lined up this summer

Image: LLDG

Free two-day festival returns

A free two-day festival celebrating a range of entertainment is returning to Royal Victoria Docks.

Ensemble Festival 2025, produced by Certain Blacks, will take place on Saturday July 26 and Sunday July 27 from 12pm to 10pm, featuring a packed programme of circus, dance, physical theatre, and street arts.

Oliver Lyette, artistic director of Certain Blacks, said: "Ensemble represents everything we're about at Certain Blacks."

"Our aim is to bring diverse artists from the margins into the mainstream."

Now in its sixth edition, the festival marks the 10th anniversary of Certain Blacks.

The programme will feature new commissions, returning favourites, and international artists.

Highlights include Hydro-punk, an interactive water installation by Arizumi and Tenderfoot Theatre, and HUG, an aerial performance by Le Vanies Dance Theatre exploring connection and physicality.

With step-free access, accessible toilets, and a dedicated access team, the festival is designed to be inclusive and welcoming to all.

The full programme is available at www.certainblacks.com.

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TRANSPORT
FOR LONDON
EVERY JOURNEY MATTERS

Wimbledon & Wandsworth Times:

Thursday, July 24, 2025

News | 5

Details of homes scheme for former hospital wing

By CHARLOTTE LILLYWHITE
Local democracy reporter

DETAILED plans to bulldoze a former hospital wing to make way for 150 new homes have been unveiled.

The future of Regens Wing, in Coombe Road, has been hanging in the balance since it stopped being used by Kingston Hospital in 2021.

The Planning Inspectorate granted Advanced Listing (Kingston) Limited's appeal to demolish the wing and build 128 new flats for elderly people, a wellness centre and restaurant in a block, up to eight storeys tall in 2022. The plans included 45 parking spaces, but were never carried out.

New owner Bywater Properties bought the site in 2024 and has now published detailed plans to transform it, after consulting with residents in June. It wants to build 150 new homes across three blocks on the site, with a mix of one to three bedrooms, along with 200 cycle parking spaces, green space and a play area.

The development would be car-free, except for designated Blue Badge spaces, and feature 30 new trees. It would have facilities for residents on the ground floor, including co-working spaces, an indoor gym and a lounge. The central block would have a concierge to manage the site.

A website set up by Bywater outlines key differences between the approved scheme and its plans. It says the revised development would have a smaller footprint, allowing for much more green space, while the tallest block would be shorter, at 21.2 metres instead of 26.5 metres. It adds there would be more distance between the new blocks and neighbours' gardens on Wolven Avenue.

The website said: "Following Bywater's purchase of the site in 2024, we have been working hard to design an improved scheme which relates more comfortably to its surrounding context, while continuing to deliver much needed new homes for Kingston."

It added: "Our proposals have been designed to ensure that the character of the local area is respected and enhanced by the development, ensuring that the new buildings become a part of the community."

Regens Wing is a Victorian building which was previously the infirmary for Kingston Union Workhouse. It was later used as offices for Kingston Hospital, but is no longer part of Kingston and Richmond NHS Foundation Trust and has been empty since 2021.

Bywater will need to submit a planning application.

Council to be taken over

The government has confirmed it will press ahead with the appointment of commissioners to take control of Croydon Council, despite Mayor Jason Perry's insistence that his administration "is not failing".

The four commissioners will be given sweeping powers over the council's leadership, governance, financial management and senior appointments, effectively allowing them to override key decisions if necessary.

The announcement follows growing concern in Whitehall over Croydon's financial stability.

Last month, Minister for Local Government Jim McMahon warned that the borough's financial position was "deteriorating rapidly" and that a "short, sharp rouse" was required.

Mr Perry said: "In response to the government's 'minded to' decision, we submitted serious, credible proposals to address Croydon's challenges. It is deeply disappointing that neither these nor the council's substantial progress, including significant improvements to leadership, governance and culture, have been recognised."



Early CGI for the plans for Coombe Road

Image: Bywater Properties

Your city centre. Your say.

We're proposing changes to the central London Congestion Charging scheme.





Have
your
say

MAYOR OF LONDON

Our proposals include a change in the charge level from £15 to £18, a new discount for electric vehicles and a change to the Residents' Discount for new applicants. We also propose changes to the Mayoral Guidance which sets out how changes to the scheme are made. If introduced, our proposals would begin to come into effect from January 2026.

For more information and to have your say, please scan the QR code or:

Visit: tfl.gov.uk/congestion-charge-proposals

Email: haveyoursay@tfl.gov.uk

Telephone: 020 3054 6037 (call back service)

Write to: **Freepost TfL Have Your Say (Congestion Charge)**

The consultation is open now until Monday 4 August 2025.

For those paying the charge in the three days after travel, the charge would increase from £18 to £21.
Zero emission for the tailpipe vehicles.



TRANSPORT
FOR LONDON

EVERY JOURNEY MATTERS

(x) Social Media promotions

(a) Organic social media campaign

Through our in-house teams, we promoted the consultation on TfL social media channels at the beginning, middle and end of the consultation period. We published posts on platforms Facebook, LinkedIn and X (formerly Twitter).

Outcome of campaign:

As at 13:00 on 4 September 2025:

Announcement post: 27 May:

Metrics	Facebook	X	LinkedIn
Impressions*	22.9k 3.5% ↑ above benchmark	85.9k 280.15% ↑ above benchmark	79.3k 215.45% ↑ above benchmark
Engagement (likes/dislikes, comments, shares)	396 Reactions 169 Comments 29 Shares 2 Saves 174.62% ↑ above benchmark	127 Reactions 171 Comments 88 Shares 28 Saves 280.62% ↑ above benchmark	197 Reactions 114 Comments 25 Shares 10.64% below benchmark
Link clicks	269	1043	n/a

Reminder post: 1 July:

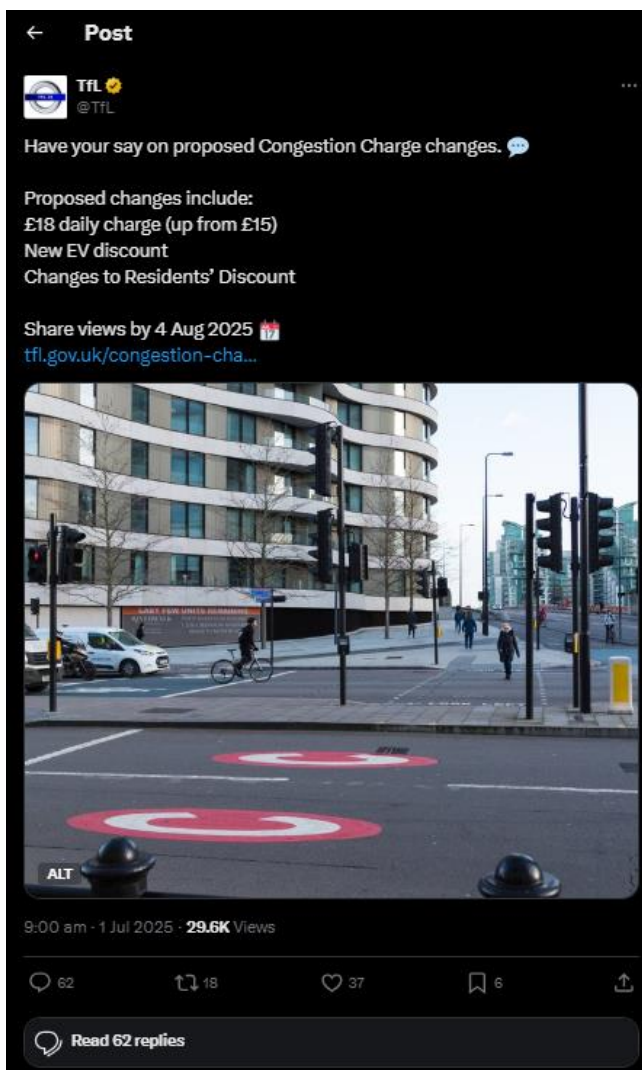
Metrics	Facebook	X	LinkedIn
Impressions*	24.2k 9.38% ↑ above benchmark	29.6% 31% ↑ above benchmark	23.5k 6.52% below benchmark
Engagement (likes/dislikes, comments, shares)	81 Reactions 140 Comments 6 Shares 0 Saves 4.60% ↑ above benchmark	37 Reactions 62 Comments 18 Shares 6 Saves 13.08% ↑ above benchmark	34 Reactions 13 Comments 5 Shares 86.17% below benchmark
Link clicks	231	308	n/a

Final post: 5 Aug

Metrics	X
Impressions*	24.3k

	7.54% ↑ above benchmark
Engagement (likes/dislikes, comments, shares)	32 Reactions 54 Comments 14 Shares 0 saves 8.06% ↓ below benchmark
Link clicks	277

Post on X/Twitter:



(b) Paid-for social media campaign

Through our marketing agency Wavemaker, we ran a focussed four-week campaign during the consultation period on Meta channels (Facebook and Instagram) to promote the consultation. Wavemaker prepared the following report on the performance of the campaign:

What Happened?

The TFL Congestion Charge campaign ran on Meta from 10 July to 6 August, reaching 8.5M unique users and fully spending its budget. While reach (-18%) and impressions (-4%) slightly underdelivered against targets, the campaign significantly exceeded engagement expectations. It generated 31,805 link clicks, with a click-through rate (CTR) of 0.20%, a 564% improvement over the planned 0.03%. Cost efficiency was a strong point, with CPC decreasing by 84% and CPM remained steady against planned target. The budget was updated mid-flight to account for over-pacing impressions and DV fees. The campaign was also extended to 6 August (instead of 4 August) to align with the updated consultation deadline of 11 August. Corresponding copy updates were made to reflect this revised date.

Why it happened?

Extending the campaign by two days helped deliver an extra 927K impressions and kept momentum high. Messaging continued to focus on Congestion Charge changes and EV discounts, relevant to targeted boroughs. A refined targeting approach improved CTR within high-priority boroughs. Frequency increased to 1.88 (from a planned 1.60), reinforcing the message, while CPM stayed steady.

Audience Engagement

Reach delivery was highest among younger audiences, with 25–34s reaching 2.8M and 18–24s reaching 2.07M, though their CTRs were comparatively lower at 0.18% and 0.15%. In contrast, older audiences (especially 45+) delivered lower reach volumes but significantly stronger CTRs - ranging from 0.25% to 0.32%, showing a more intentional engagement with the messaging. Gender-wise, male users accounted for a higher share of total reach (4.4M) and delivered a CTR of 0.22%, compared to 0.17% from females. Males also accounted for 59% of total link clicks, further reinforcing their stronger response to the campaign content.

Creative Impact

Both creative versions performed well. Version 2 achieved the highest reach, with 5.79M users, while Version 1 reached 4.90M. However, Version 1 delivered stronger engagement (CTR of 0.22% vs. 0.18%) and slightly more link clicks (16,146 vs. 15,660). This suggests Version 2 was more effective for reach objectives, while Version 1 proved more efficient for driving action and interest. The low-angle perspective in Version 1 made the creative feel more dynamic and immersive, placing viewers in the driver's seat and likely resonating with those most affected by the charge, helping to boost engagement. In contrast, Version 2's straight-on viewpoint offered clear, authoritative messaging and broad recognition, supporting reach objectives but resulting in lower engagement. Consistent CPMs and an even split in spend indicate both assets were equally prioritised, providing a balanced test of performance.

Age	Reach	Link clicks	CTR
18-24	2,070,533	6,229	0.15%
25-34	2,809,863	10,036	0.18%
35-44	1,746,948	6,602	0.22%
45-54	899,074	4,388	0.25%

55-64	630,786	2,872	0.28%
65+	307,201	1,679	0.32%

Gender	Reach	Link clicks	CTR
Female	3,966,985	12,587	0.17%
Male	4,411,402	18,868	0.22%

Static Creative	Reach	Link clicks	CTR
CC Sign - Version 1	4,903,481	16,146	0.22%
CC Sign - Version 2	5,788,616	15,660	0.18%

Meta platforms advert:


Transport for London

Sponsored · Paid for by Transport for London

We're consulting on changes to the Congestion Charge:

- A daily charge increase from £15 ...see more

About this ad



www.tfl.gov.uk

Proposed changes to the Congestion Charge

Learn more

Stephan... 149 comments 21 shares

Like Comment Share

C – Integrated Impact Assessment (IIA)

Integrated Impact Assessment for the proposed changes to the central London Congestion Charge (Updated Version for Mayoral Decision)

October 2025

Table of Contents

Executive Summary	97
1. Introduction	98
1.1 Overview	98
1.2 Structure of the IIA.....	98
2. Context and Proposals	99
2.1 Background	99
2.2 Policy Context	101
2.3 Our proposals.....	106
3. Approach to the IIA	109
3.1 Overview of the IIA process	109
3.2 Purpose of the IIA.....	110
3.3 IIA Assessment Framework	110
3.4 Stakeholder engagement.....	121
4. Suggested Modifications to our Proposals Post-Consultation	122
5. Additional Information Post-consultation	125
6. Baseline	128
6.1 Spatial context.....	128
6.2 Economy Baseline.....	134
6.3 Environment Baseline.....	143
6.4 People Baseline	146
7 Forecast Impacts of Proposed Changes on Travel Patterns	176
7.1 Introduction.....	176
7.2 Key Outputs.....	177
8 Economy	180
8.1 Introduction.....	180
8.2 Assessment Criteria	180
8.3 Assessment.....	180
8.4 Summary of Assessments	188
9 Environment	189
9.1 Introduction.....	189
9.2 Assessment Criteria	189
9.3 Assessment.....	190
9.4 Summary of Assessments	194
10 People (Health and Equality)	196
10.1 Introduction.....	196

10.2	Assessment Criteria	196
10.3	Assessment.....	197
10.4	Summary of Assessments	240
11	Summary of Impacts and Potential Mitigation	248
12	Monitoring and Evaluation	255

Figures Index

Figure 1: Integrated Impact Assessments framework.....	109
Figure 2: Congestion Charge Zone (CCZ) area in central London	120
Figure 3: Host boroughs map	121
Figure 4: Public Transport Accessibility Level (PTAL) score map.....	129
Figure 5: Education facilities in the CCZ	130
Figure 6: Healthcare facilities in the CCZ.....	131
Figure 7: Community centres in the CCZ.....	132
Figure 8: Religious centres in the CCZ	133
Figure 9: Impact of Proposed Changes compared to the 'Do Nothing' scenario in each assessed year in terms of percentage change in numbers of vehicles in the CCZ on an average weekday.....	178

Tables Index

Table 1: Proposed Changes to Congestion Charging scheme	107
Table 2: Overview of the IIA assessment remit.....	109
Table 3: Summary assessment topics scope table	111
Table 4: Scope of IIA assessments	112
Table 5: Topics scoped out of IIA assessments.....	116
Table 6: Impact rating matrix	118
Table 7: Scale of overall effect of impact (rating).....	118
Table 8: Employees in CCZ by Broad Industry Group	134
Table 9: Employment by occupation of residents	135
Table 10: Main mode of travel to work for Londoners who work within the CCZ	136
Table 11: Main mode of travel to work for CCZ residents	136
Table 12: Licensed private hire operators split by tier.....	136
Table 13: PHV fuel type breakdown	137
Table 14: New PHV registrations	138
Table 15: Number of VAT and/or PAYE based local units by broad industry group	138
Table 16: Number of VAT and/or PAYE based local units by employment size bands....	139
Table 17: Number of micro local units (0-9 employees) by broad industry group	139
Table 18: London resident leisure trips with destination in CCZ by main mode.....	140
Table 19: London van stock and mileage	140
Table 20: Size of van fleets, business van keepers only.....	140
Table 21: Annual spend by commuters and tourists within the CCZ (£bn)	142
Table 22: NO _x emissions in the CCZ for 2024 (tonnes/year)	143

Table 23: PM ₁₀ emissions in the CCZ for 2024 (tonnes/year)	144
Table 24: PM _{2.5} emissions in the CCZ for 2024 (tonnes/year)	144
Table 25: CO ₂ emissions in the CCZ for 2024 (tonnes/year)	145
Table 26: Population for relevant geographic areas	146
Table 27: London residents (aged 5+) using modes at least once per week	147
Table 28: London resident trips with CCZ destination, by mode	147
Table 29: London residents with access to a car by relevant geographic area	148
Table 30: Age distribution for relevant geographic areas	149
Table 31: London residents (aged 5+) using modes at least once per week, by age	150
Table 32: London's residents' access to cars	150
Table 33: Proportion of population with disability by relevant geographic area	152
Table 34: London residents (aged 5+) using modes at least once per week, by disability	153
Table 35: London resident access to one or more cars in household, by disability	153
Table 36: Dial-a-Ride travel data by borough (Period 12 (02/02/2025 -01/03/2025))	154
Table 37: Blue Badge holders by relevant borough	154
Table 38: Racial identity of population by relevant geographic area	157
Table 39: London resident access to one or more cars in household, by race	158
Table 40: London residents (aged 5+) using modes at least once per week, by ethnicity	158
Table 41: Religious identity of population	160
Table 42: Fertility rates 2023	161
Table 43: Sex of population	162
Table 44: London residents (aged 5+) using modes at least once per week, by gender	163
Table 45: Trans identity of population	164
Table 46: LGB+ identity of population	165
Table 47: Number of people assessed as owed a duty (July to September 2024)	166
Table 48: Number of people seen rough sleeping in Host boroughs 2023/2024	166
Table 49: Number of Asylum Seekers in receipt of support, by borough	167
Table 50: Employment and unemployment levels	168
Table 51: People on Universal Credit (December 2024)	169
Table 52: Approximated social grades	170
Table 53: Income deprivation by borough	170
Table 54: London population employed in certain care activities	172
Table 55: Unpaid carers	172
Table 56: London residents (aged 5+) using modes at least once per week, by income	173
Table 57: Mode of travel into CCZ by London residents based on income	173
Table 58: London resident access to one or more cars in household, by income	174
Table 59: Impact of Proposed Changes compared to the 'Do Nothing' scenario in each year on numbers of vehicles in the CCZ during an average weekday (veh/day, rounded to the nearest 100) and the percentage difference.	177
Table 60: Impact of Proposed Changes compared to the 'Do Nothing' scenario in each year on numbers of vehicles in the CCZ during an average weekend day (veh/day, rounded to the nearest 100) and the percentage difference.	179
Table 61: Summary of findings for each topic of the Economy Impact Assessment	188
Table 62: Estimated impact of Proposed Changes on NO _x emissions in the CCZ during charging hours for cars, vans, PHVs and HGVs (percentage change)	190

Table 63: Estimated impact of Proposed Changes on PM ₁₀ emissions in the CCZ during charging hours for cars, vans, PHVs and HGVs (percentage change)	191
Table 64: Estimated impact of Proposed Changes on PM _{2.5} emissions in the CCZ during charging hours for cars, vans, PHVs and HGVs (percentage change)	191
Table 65: Estimated impact of Proposed Changes on CO ₂ emissions in the CCZ during charging hours for cars, vans, PHVs and HGVs (percentage change)	192
Table 66: Summary of findings of the potential impacts of Proposed Changes to the Congestion Charge on London's environment.....	194
Table 67: People assessment topics and objectives	196
Table 68: Summary of impacts for older people	219
Table 69: Summary of impacts for younger people	221
Table 70: Summary of impacts for disabled people	224
Table 71: Summary of impacts for people based on their race	227
Table 72: Summary of impacts for people based on their religion or belief.....	229
Table 73: Summary of impacts for people based on their sex	230
Table 74: Summary of impacts for pregnant and maternal women.....	232
Table 75: Summary of impacts for people on low incomes.....	235
Table 76: Summary of impacts for asylum seekers and refugees	236
Table 77: Summary of impacts for homeless people	237
Table 78: Summary of impacts for carers	237
Table 79: Summary of impacts for LGBT people	238
Table 80: Summary of findings of the potential impacts of Proposed Changes to the Congestion Charge on London's People (Health and Equality)	240
Table 81 Summary of impacts and proposed mitigations and enhancements	248

Executive Summary

This report presents the findings from the Integrated Impact Assessment (IIA) of the proposed changes to the Congestion Charging scheme. The IIA provides an integrated assessment of the potential positive and negative effects on the environment, people, including their health and with protected characteristics or are disadvantaged in London, and the economy. It also identifies mitigation measures to either enhance potential positive effects or minimise negative ones.

Table 86 summarises the identified impacts of our proposals in relation to the assessed topics relating to the economy, environment, and people (equality and health) within this report, alongside mitigations and enhancements where relevant. The findings of this assessment have been reviewed and updated post-consultation, including considering how the modifications we are recommending to the Mayor in response to feedback, as summarised in Section 4, help to mitigate the identified impacts should they be approved.

1. Introduction

1.1 Overview

This report presents an Integrated Impact Assessment (IIA) for a package of proposed changes (Proposed Changes) to the Congestion Charging scheme.

An IIA is an integrated assessment of both positive and negative effects of a proposal. It provides a comprehensive evaluation that considers the potential effects of the Proposed Changes on various aspects of society, including people, the economy and the environment. The purpose is to identify, measure and understand the implications of the Proposed Changes, shape potential changes to them and help mitigate any negative effects and enhance beneficial effects. The assessment and its findings help to ensure the decision-maker is informed of the anticipated impacts of the Proposed Changes and the mitigations required when making their decision.

The report sets out the approach to assessment of potential impacts including the policy context, background and a summary of the Proposed Changes. The assessment looks at the impact of the Proposed Changes to the Congestion Charging scheme on the Environment, Economy and People (including Health and Equality) explaining the potential effects and mitigation.

1.2 Structure of the IIA

The IIA follows this structure:

- Chapter 2: summarises the Proposed Changes, including policy context, background of the Congestion Charging scheme, and a description of the Proposed Changes
- Chapter 3: provides an overview of the IIA process and its role in decision making, including the scope of the analysis
- Chapter 4: outlines our recommended modifications to our proposals post-consultation
- Chapter 5: provides further information on the assessments within the IIA following public consultation feedback
- Chapter 6: presents the baselines used for each of the assessments, including the data sources used
- Chapter 7: presents the expected impacts of the Proposed Changes on traffic levels and travel inside the Congestion Charge Zone (CCZ)
- Chapter 8: presents the assessment of the impacts on the economy
- Chapter 9: presents the assessment of the impacts on the environment
- Chapter 10: presents the assessment of the impacts on people including health and equality impacts
- Chapter 11: provides a summary of the impacts identified and introduces the decision-making process based on those
- Chapter 12: includes monitoring and evaluation for the Proposed Changes

2. Context and Proposals

2.1 Background

Managing traffic levels and using London's road space more efficiently with better-managed freight and fewer car trips, and supporting journeys by public transport, walking and cycling will help address many of the challenges Londoners face. These include the climate crisis, air pollution, health and inactivity, road danger and congested roads. Less congestion means fairer access to amenities, jobs and services. It will enable children to travel independently, create more pleasant streets and strengthen the local economies in our town centres and high streets. One of the ways in which we can achieve these aims is through the Congestion Charging scheme.

2.1.1 Introduction to the scheme

The Congestion Charging scheme was first introduced in central London on 17 February 2003. The primary objective of the scheme is to manage traffic and congestion in central London by reducing the number of vehicles that enter the CCZ during charging hours by imposing a charge during certain hours.

The scheme requires that a daily charge is paid for each charging day that a vehicle is driven in the charging zone during charging hours. The Congestion Charging scheme has a number of discounts and exemptions, and a small number of reimbursements. Generally, customers have to register for a discount and provide proof of eligibility. Exemptions are usually automatically applied.

Following its introduction in February 2003, the Congestion Charging scheme was very effective in reducing traffic and congestion in the CCZ. By April 2004, there was a 30 per cent reduction in congestion within the CCZ, and a 15 per cent reduction in circulating traffic within the zone.⁵⁷ It remains an integral part of managing demand for road space in central London and delivering the aims of the Mayor's Transport Strategy (MTS), and achieving the Mayor's vision for a safer, fairer and greener London.

In addition, by reducing the overall volumes of traffic within the CCZ and increasing the efficiency of circulating traffic, the Congestion Charging scheme was responsible for a reduction in emissions. As of April 2004, this equated to approximately a 12 per cent emissions reduction of both NO_x and PM₁₀ from road traffic within the zone⁵⁸ and 20 per cent reduction in emission of CO₂ (carbon dioxide) from road traffic within the zone based on a 24-hour average day, since the introduction of the scheme.⁵⁹

2.1.2 Congestion Charge in recent years

The Congestion Charging scheme has now been in operation for more than 20 years and has been modified many times in that period. These changes have covered a variety of aspects,

⁵⁷ TfL (2004) [Congestion Charge Second Impacts Monitoring Report](#)

⁵⁸ Nitrogen dioxide (NO₂) and particulate matter (PM) are the two main pollutants of concern in London owing to their adverse impacts on human health. The exhaust emissions that give rise to NO₂ are oxides of nitrogen (NO_x), which are made up of both nitrogen oxide (NO) and NO₂. PM₁₀ refers to particles with a diameter of 10 microns and smaller

⁵⁹ Congestion Charge Second Impacts Monitoring Report, TfL, 2004

ranging from the level of the charge to changes to payment methods, operating hours and changes to discount eligibility criteria.

In accordance with Proposal 20 in the MTS, we continually monitor the number of vehicles being driven in the CCZ, and this includes characteristics such as the vehicle type, how and when it is used, the mix of fuel types, and the number of uncharged vehicles.⁶⁰

The Congestion Charge has progressively increased since its introduction in order to maintain its deterrent effect: £8 per day from July 2005; to £10 from January 2011; to £11.50 from June 2014; and to £15⁶¹ from 2020.

Similarly, we have progressively tightened the criteria for the 'green discount' for vehicles with low emissions or electric vehicles (currently the Cleaner Vehicle Discount (CVD)) as the number of eligible vehicles in the zone has risen and vehicle technology has improved. We have also made changes to improve the offer to our customers, such as the introduction of Auto Pay in 2011⁶², which removes the risk of a Penalty Charge Notice (PCN) for non-payment. Auto Pay now acts as a single payment account for other road user charges such as the Ultra Low Emission Zone (ULEZ) and the Silvertown and Blackwall tunnels charges, and is used by most customers.

These changes were made to maintain the effectiveness of the scheme to manage traffic in central London and respond to changing wider conditions, such as the availability of new payment technology.

2.1.3 The Cleaner Vehicle Discount

There has always been a 'green discount' for the Congestion Charge so that there is 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.

The criteria for this discount have tightened over time, enabling us 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. The most recent version was introduced in 2019 and is known as the CVD. It has three phases:

- Zero Emission Capable (ZEC)⁶³ from April 2019
- Electric vehicles (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.

Following their implementation, these changes led to short-term reductions in the number of vehicles registered for the 'green discount'. However, the general trend is an increase in registered

⁶⁰ Certain vehicles such as TfL buses, vehicles with 9+ seats, taxis and motorcycles do not pay the Congestion Charge. For a full list of discounts and exemptions, see: <https://tfl.gov.uk/modes/driving/discounts-and-exemptions>

⁶¹ This was a temporary increase which was made permanent following a Mayoral decision in in 2021.

⁶² Fleet Auto Pay existed prior to this date

⁶³ Euro 6 standard, emit no more than 75g per km of CO2 and have a minimum 20-mile zero emission capable range

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 CVD.

As set out in the Mayoral decision 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 2018⁶⁴ giving drivers and vehicle owners seven years' advance notice of the phased approach to the discount and its eventual withdrawal date.

Four years after the most recent change to the CVD when the criteria tightened to EVs (battery electric or hydrogen fuel cell vehicles only), the number of vehicles registered for this discount has risen considerably. Around 20,000 vehicles were registered for the discount at the start of 2019, and as of September 2025, there are now around 118,000 vehicles registered. The vast majority of these are cars (91 per cent) with the second highest vehicle type being vans (light good vehicles, LGVs) (six per cent, circa 6,200 vans registered for the CVD). This represents an all-time high, and with two months until the discount closes in December 2025, is likely to continue to increase even further.

2.2 Policy Context

The Proposed Changes to the Congestion Charging scheme are presented in the context of the Mayor's strategic priorities for London, as set out in his Transport Strategy, the London Plan, and the London Environment Strategy.

The central aim of the MTS is for 80 per cent of all trips in London to be made on foot, cycle or public transport by 2041. To achieve this, the expected outcomes of the MTS include:

- a 95 per cent mode share for walking, cycling and public transport for trips within central London (up from 90 per cent in 2015) by 2041
- a 99 per cent mode share for walking, cycling and public transport for trips between central London and inner/outer London (compared with 95 per cent and 90 respectively in 2015) by 2041

Proposal 20 of the MTS commits to keep road user charging schemes under review to ensure their effectiveness in achieving the MTS policies and proposals:

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.

In 2022, following a public consultation, the Mayor published a revision to the MTS which reflected the Mayor's ambitions for air quality aims in Greater London to align with new World Health Organisation (WHO) guidelines⁶⁵ and for London to be a net zero carbon city by 2030. A new proposal was inserted which provides that TfL may use road user charging schemes to address the specific challenges of toxic air pollution, the climate emergency and traffic congestion:

Proposal 24.1

⁶⁴ Mayoral Decision (MD) 2397 <https://www.london.gov.uk/decisions/md2397-amendments-congestion-charge-and-ultra-low-emission-zone>

⁶⁵ [WHO guidelines](#) were tightened in September 2021 so that there are now lower thresholds for recommended levels of pollutants

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.

Although this revision was made in the context of the proposed expansion of ULEZ London-wide (which was subsequently implemented in August 2023), it also applies to the Congestion Charging scheme.

2.2.1 MTS objective for an 80 per cent active, efficient and sustainable mode share by 2041

The central aim of the MTS is for 80 per cent of all trips in London to be made on foot, cycle or public transport by 2041, with changes across London's transport network designed to make journeys faster and more reliable and transform London's streets for a more sustainable future.

Reducing traffic improves conditions for active, efficient and sustainable modes by reducing delay to journey times for individuals and businesses, improving reliability for buses and making streets safer for people walking, wheeling and cycling. The Congestion Charging scheme is a means of encouraging a shift to sustainable modes by acting as a deterrent to some vehicle trips in central London.

Delivering this objective requires that London's public transport provides a reliable and practical alternative to car use, and that people feel safe and confident to walk and cycle. Achieving this requires that the negative impacts of traffic and congestion caused by motorised vehicles are reduced, and that there is an appropriate difference between the cost of public transport and the cost of driving.

In 2023, the active, efficient and sustainable mode share for all travel in London was estimated at 63.2 per cent, an increase on the two previous years but below the required target to meet the MTS aim.⁶⁶ In central London, 94 per cent of London residents travelling into the CCZ use these modes.⁶⁷

Central London is very well-served in terms of options for public transport, walking and cycling, meaning that for many trips there are excellent alternatives to private car use.

2.2.2 MTS objective of efficient use of street space in central London

Given the tightly constrained road network in central London, efficient movement is fundamental to the continued success of this area and, given its strategic importance, the success of London in general. Reliable deliveries and servicing, high-quality public services and easy access to workplaces and cultural and leisure attractions are all dependent on an efficient transport network.

Compared to buses and people walking and cycling, cars take up considerably more road space per person. Hence, a shift from car use to sustainable modes makes more efficient use of London's streets, providing the only long-term solution to the congestion challenges that, as outlined in the MTS, threaten London's status as an efficient, well-functioning city.

The MTS sets a total traffic reduction target of 10-15 per cent by 2041 to tackle congestion and improve the efficiency of streets for the movement of people and goods.

⁶⁶ TfL (2024) [Travel in London 2024 \(P.11\)](#)

⁶⁷ LTDS, 2023/24.

The Congestion Charging scheme helps to manage demand for road space in central London by requiring that most drivers pay a charge during charging hours, meaning that some will choose to use other modes (such as bus or walking), re-time their journey to outside charging hours, or not make the journey.

Freight and servicing in central London

Managing freight and servicing trips has benefits in terms of reducing air quality and carbon emissions and achieving Vision Zero. The MTS has an objective to reduce the number of lorries and vans entering central London during the weekday morning peak by 10 per cent from 2016 levels, by 2026. This reflects pressures on the road network at this time of the day and will help to reduce road danger.

Since the pandemic, the reduction in vehicles has meant this target has been met, but prior to this van numbers had been increasing and in the period 2017/18-2018/19 they were above the target. In 2024, although below the target, van traffic increased. It remains important to reduce motorised freight trips to avoid vehicle numbers returning to pre-pandemic figures. We must also continue to encourage a shift to the most efficient and sustainable options for these journeys. This includes re-timing journeys where possible to avoid peak periods, switching to EVs and making it easier to make some trips using more sustainable modes such as cargo bikes.

2.2.3 Air Quality and the climate emergency

The Mayor has set out his ambition for a net zero carbon London by 2030, his ambition to achieve the 2021 WHO air quality guideline levels and that this will require coordinated action from all levels of government.⁶⁸ This is reflected in Proposal 24.1 (described above), while a number of other policies and proposals in the MTS set out how we will reduce harmful air pollution and carbon emission from road transport. Approximately half the nitrogen dioxide (NO₂) emissions in London derive from road transport and the highest NO₂ concentrations are located at congested roads.⁶⁹

There are a number of policies and programmes which support us meeting our air quality and climate ambitions. A key scheme here is the ULEZ, which was first implemented in central London in April 2019, and subsequently expanded to inner London (October 2021) and London-wide (August 2023). As a result of all phases of the ULEZ, in 2024 roadside NO₂ concentrations are estimated to be 54 per cent lower in central London, 29 per cent lower in inner London and 24 per cent lower in outer London than they would have been without the ULEZ.⁷⁰ In addition, road transport is also responsible for 19 per cent of carbon emissions⁷¹ in London; Again, ULEZ schemes have had an impact on reducing carbon emissions. CO₂ emissions are estimated to be six per cent lower across London in 2024 due to all phases of the ULEZ.⁷² Cumulatively since 2019, CO₂ emissions are estimated to be 813,000 tonnes lower across London, equivalent to a two per cent reduction.⁷³

We are also taking action on the vehicle fleets we operate and regulate. London continues to have the largest zero-emission bus fleet in western Europe, which has increased to over 1,900 buses compared to just 30 in 2016. We are on track to have a fully zero-emission bus fleet by 2034 and

⁶⁸ [Greater London Authority \(2024\), Air Quality in London 2016-2024](#)

⁶⁹ London Assembly press release 21 Feb 2022 [Air pollution from London's road transport | London City Hall](#)

⁷⁰ [TfL \(2025\), London-wide Ultra Low Emission Zone – One Year Report](#)

⁷¹ In 2015. From [London Environment Strategy \(2018\)](#)

⁷² [TfL \(2025\), London-wide Ultra Low Emission Zone – One Year Report \(p.57\)](#)

⁷³ [TfL \(2025\), London-wide Ultra Low Emission Zone – One Year Report \(p.57\)](#)

are working on opportunities to accelerate in line with the Mayor's ambition for a fully zero-emission bus fleet by 2030 (subject to additional Government funding).

For taxis and private hire vehicles (PHVs), licensing requirements have accelerated the shift to ZEC⁷⁴ and EVs. The taxi trade and the PHV industry have been very successful in switching to these vehicles and reducing emissions. Over 60 per cent of London licensed taxis and 53 per cent of London licensed PHVs are now ZEC or electric.⁷⁵

The green discounts for the Congestion Charge have been one of the ways we have incentivised drivers in central London to shift to cleaner vehicles, to ensure that where people drive, their impact on air quality and carbon emissions is as low as possible.

Electric vehicles in the CCZ

We are now seeing an average of 16,589 unique EVs in the zone⁷⁶ during weekday charging hours, out of a total average of 105,168 cars, PHVs and 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.⁷⁷ The number of EVs in the zone is expected to continue to increase to the end of 2025 when the CVD is due to close, to an estimate of 20,300 EVs during charging hours on an average weekday. This is close to 20 per cent of all vehicles seen in the zone.

The proportion of EVs inside the CCZ has increased with time.⁷⁸ Comparing an average day in September 2022 to an average day in September 2024, 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.

Support for businesses to make the switch to zero emission transport

As described above we have number of policies and programmes in place to help the transition to EVs and thereby reduce carbon and air pollutant emissions. We have a particular focus on supporting businesses, where there is the opportunity to achieve significant emissions reductions but greater challenges in terms of moving away from using petrol and diesel vehicles and in adopting EVs.

TfL is supporting the transition to electric vans and more sustainable freight modes by working with stakeholders to improve our understanding of the challenges facing the freight and servicing industry, supporting EV charging infrastructure rollout, including charge points suitable for them and facilitating the wider adoption of cargo bikes as a sustainable alternative for many van trips. The proposed new CVD is another way we propose to support businesses with electrification.

⁷⁴ For taxis, this means having CO₂ emissions of no more than 50g/km and a minimum 30 mile zero emission range. For PHVs, it means they must emit no more than 50g/km CO₂ and be capable of being operated with no (zero) exhaust emissions for a minimum range of 10 miles; or emit no more than 75g/km CO₂ exhaust emissions and be capable of being operated with no (zero) emissions for a minimum range of 20 miles

⁷⁵ From [Taxi and private hire action plan \(2025\)](#)

⁷⁶ On an average weekday in September 2024. Average figures during weekend charging hours for September 2024 are: 5,469 electric cars (excluding PHVs), 4,943 electric PHVs and 543 electric vans, out of 10,955 total EVs and 67,433 vehicles in total. The weekend figures were not given in the original version of this document; additionally, the weekday average of unique EVs has been updated from 16,568 and the word 'weekday' added for clarity.

⁷⁷ On an average weekday in September 2024. In an earlier version of this document this was erroneously described as weekdays and weekends.

⁷⁸ Number of times each vehicle is captured by our cameras

There are more than 25,509 public charging points across London⁷⁹ which means that the EV infrastructure network in London has grown by over 500 per cent since 2019⁸⁰ and that we are on track to have more than 40,000 charge points by 2030.

This includes the delivery of rapid and ultra rapid charge points, which are more likely to suit the needs of high-mileage business users such as electric van users for top-up charging.

We also continue to unlock Greater London Authority (GLA)⁸¹ group land for rapid EV charging, providing new rapid and ultra-rapid charge points on our road network in addition to the 300 rapid charge points we have already delivered. In December 2024, Places for London, TfL's property company, entered into a joint venture partnership with charge point operator Fastned to develop a network of new ultra-rapid charging hubs across our estate. Each hub site will deliver at least six ultra-rapid charging bays and will use 100 per cent certified renewable energy. Construction at the first site in Hatton Cross has commenced and is expected to be operational by early 2026.

We, along with the Mayor and other organisations, have also been calling for the extension of the plug-in van grant to 2026, which has recently been confirmed by the Government.

During the consultation period, the Government made announcements about supporting the purchase of certain electric cars, vans and HGVs. The £650m Electric Car Grant⁸² and the extension to the plug-in van and truck grant⁸³ until at least 2027, will reduce the costs of vehicle purchase for individuals and businesses.

Grants are also available for organisations, including businesses and charities, towards the cost of installing charge points at their sites.

The scrappage scheme which supported the London-wide expansion of the ULEZ provided a higher level of grant (an additional £2,500) for businesses and charities upgrading to an electric van. As a result, eligible applicants could receive £9,500 towards the scrapping or donating of a non-compliant van and purchase of an electric van to replace it. As of 7 September 2024, over 380 applications for scrapping a non-compliant van and replacing with an electric van had been approved. The previous scrappage scheme which supported the ULEZ introduction to central London and its subsequent expansion to inner London also included higher grant payment levels for those scrapping and replacing a non-compliant van with an electric van. The previous scrappage scheme approved 169 applications for this option.⁸⁴

We are also supporting the shift towards more sustainable movement of freight through the promotion of and support for cargo bikes. They are a safe, clean and in many cases more efficient alternative to vans and other light goods vehicles. In line with the actions outlined in our Cargo bike

⁷⁹ TfL (October 2025), [London's electric vehicle infrastructure strategy – 2025 update](#)

⁸⁰ Department for Transport & Office for Zero Emission Vehicles (October 2025), [Electric vehicle charging infrastructure statistics](#)

⁸¹ TfL is a statutory body created by the Greater London Authority (GLA) Act 1999. This Act gives the Mayor of London a general duty to develop and apply policies to promote and encourage safe, integrated, efficient and economic transport facilities and services to, from and within London. For more information on how TfL is governed, see [How we are governed - Transport for London](#).

⁸² 5 August 2025 [First car models approved for £1,500 discount to turbocharge the move to electric - GOV.UK](#). Discounts up to £3,750 will be available at the point of sale for new eligible electric cars priced at or under £37,000.

⁸³ 18 August 2025 [Government discounts for electric vans and trucks extended - GOV.UK](#)

⁸⁴ The previous scrappage scheme reported vans and minibuses together, so this figure includes both vehicle types.

action plan, we published the Cargo bike operations in London: a guide in July 2024. This is the UK's first comprehensive guidance on cargo bikes, providing businesses with the tools and information to help them make the switch to cargo bikes.

Despite this progress, we still need to go further to meet our targets. The Congestion Charging scheme is an effective way of contributing to the above MTS objectives and in delivering the Mayor's vision for London. While we must carefully manage the number of vehicles driving in the CCZ, the transition to EVs is a critical part of achieving air quality and climate change ambitions, improving the environment in London. The changes proposed to the scheme in this consultation arise from the need to ensure the scheme remains effective in managing traffic in central London, supporting the move away from motorised traffic where possible, while ensuring those who drive do it in the cleanest possible vehicles.

2.3 Our proposals

As well as managing traffic, the Congestion Charge also has a role to play in contributing to other MTS objectives in London. The changes proposed arise from the need to ensure it remains effective in managing traffic in central London, to optimise its contribution to other MTS objectives including supporting a shift to EVs. By supporting people and businesses in the shift to EVs and the consequent air quality and carbon benefits of these vehicles, the changes will help to achieve the Mayor's vision for a fairer, safer and greener London.

The current charge level is £15 per day for a vehicle driven inside the CCZ during charging hours; most customers use Auto Pay to pay the charge but there are also other ways to pay in advance or up to midnight on the day of travel. There is an option to pay by midnight of the third day after travelling in the zone, set at £17.50.⁸⁵ We are proposing that the charge level would increase to £18 on 2 January 2026,²⁸ with the charge for paying up to three days after travel increasing to £21. This increase would help to maintain the traffic management effects of the Congestion Charge in central London and support the other aims of the MTS and meet the Mayor's ambitions to improve air quality in London, achieve a net zero carbon city by 2030 and cut congestion in the Capital.

While we must carefully manage the numbers of vehicles driving in the CCZ, the transition to EVs is a critical part of achieving air quality and climate change ambitions, improving the environment in London. The new proposed CVD will achieve a balance between managing overall traffic and congestion in the CCZ and supporting the electrification of the fleet in support of MTS objectives. Varying the level of discount by vehicle type enables us to provide greater support for vehicles where the transition towards EVs has been slower and there are other potential benefits, such as furthering progress towards MTS objectives. Maintaining a discount at some level for all EVs also provides ongoing support and incentives for those driving in the zone to do so in an EV. We have set out how this discount will evolve, with an initial phase from January 2026 and a further phase from March 2030. This discount would be available only to customers registered for Auto Pay.⁸⁶

Having reviewed the scheme, continuing a 100 per cent discount for all EVs after December 2025 is not proposed, and hence, not assessed in this IIA, as it would lead to a significant increase in traffic levels, undermining the objective of the Congestion Charging scheme. We are expecting to see around 20,300 EVs during charging hours on an average weekday by the end of 2025, when the CVD is coming to an end.⁸⁷ However, following consultation feedback, we are proposing a

⁸⁵ Sometimes referred to as Pay Next Day, because prior to a change in February 2022 the requirement was to pay by midnight of the following charging day.

⁸⁶ Discount is on the daily charge only. There is no option to pay discounted charges after the day of travel.

⁸⁷ Including cars, PHVs and LGVs but excluding non-chargeable vehicles such as taxis and buses

targeted new 100 per cent discount for back to base car club EVs based in the Residents' Discount zone. Further detail is provided in Section 4.

The proposal also includes changes to the Residents' Discount, proposing that for new applicants of the scheme, eligibility for the 90 per cent Residents' Discount will be limited to only EVs, starting on 1 March 2027. Existing residents who have registered for the discount prior to this date would retain their benefit, regardless of fuel type, provided that the discount's other eligibility criteria continue to be met and timely renewals are made. Following consultation feedback, we are recommending a modification to extend the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030 as explained further in Section 4. The Proposed Changes are set out below:

Table 6: Proposed Changes to Congestion Charging scheme

Area	Existing policy	New proposals
Cleaner vehicle discount	End of the CVD (100 per cent discount for EVs) on 25 December 2025. From 2 January 2026 there will be no discount for EVs operating in the CCZ.	New Cleaner Vehicle Discount (CVD). From 2 January 2026: 50 per cent discount for electric vans, Heavy Goods Vehicles (HGVs), and quadricycles (L6 and L7 category vehicles) 25 per cent discount for electric cars including PHVs From 4 March 2030: 25 per cent discount for electric vans, HGVs, and quadricycles (L6 and L7 category vehicles) 12.5 per cent discount for electric cars including PHVs
Charge level Pay within three days	£15 £17.50	From 2 January 2026: £18 From 2 January 2026: £21
Residents' Discount	90 per cent for all residents following registration for discount	From 1 March 2027: 90 per cent discount for EVs only (for new applicants, existing residents would retain 'grandparent rights')

In comparison to the scheme in operation currently, the Proposed Changes are:

- the continuation of discounts for EVs, under a new approach where discounts are offered at different rates depending on vehicle type (car, van, HGV, L6 or L7), with two phases for the discount (changing in 2030)
- an increase in the daily charge of £3, from £15 to £18
- an increase in the charge for pay within three days of £3.50, from £17.50 to £21
- a change in the Residents' Discount from 1 March 2027, where the discount for new applicants will only be available for EVs. Those with existing Residents' Discounts, have 'grandparent rights' and will retain their benefit, provided that the discount's other eligibility criteria continue to be met and timely renewals are made.

As discussed in Section 4, following public consultation we are recommending two modifications to our proposals.

In order to qualify for the new CVD, the following conditions must be met:

- The vehicle must be electrically-propelled (either battery electric or hydrogen fuel cell) and have zero tailpipe emissions (in other words, it must be an EV)
- The vehicle must be registered with the Driver and Vehicle Licensing Agency (DVLA) as an EV. Unlike the existing CVD, a customer will not need to separately register for the new CVD as we will be able to identify the vehicle's fuel type and the vehicle class from its Vehicle Registration Mark (VRM) and the associated DVLA vehicle record⁸⁸
- Once we are satisfied the vehicle is an EV, the discounted charge must be paid by Auto Pay. There is no fee to set up an Auto Pay account and the discounted levels would be automatically applied if the vehicle associated with the Auto Pay account qualifies for the new CVD
- Where a customer is already registered for Auto Pay (or Fleet Auto Pay), and their vehicle is registered with the DVLA as an EV, we will automatically collect the discounted charge

The development and rationale of the Proposed Changes can be found in the Supplementary Information document, provided as Appendix A of the Report to the Mayor.

⁸⁸ A person will still be required to register for the new CVD and provide proof that their vehicle is an EV if their vehicle is not registered with the DVLA or the DVLA record relating to their vehicle is incomplete, inaccurate or does not otherwise show that the vehicle is an EV or what its vehicle class is.

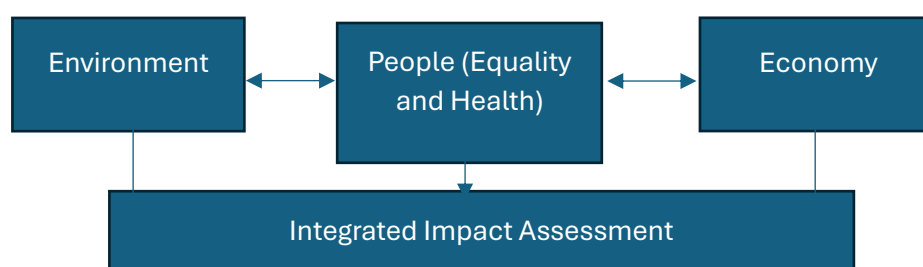
3. Approach to the IIA

3.1 Overview of the IIA process

The IIA allows us to obtain a holistic view on the potential positive and negative impacts of our proposals through an integrated assessment across three themes: Environment, People (equality and health) and Economy (Figure 7).

The IIA evaluates the impacts of the Proposed Changes to the Congestion Charge in an integrated manner to inform decision making. A single assessment framework allows all potential impacts to be assessed together rather than individually. The assessment identifies and analyses impacts across multiple topics assessing both positive and negative potential impacts. This includes how negative impacts might be avoided or mitigated and positive impacts enhanced. The Environment and Economy assessments conducted as part of this IIA not only provide the expected impacts of the Proposed Changes on the environment and the economy, but also help inform potential inequalities arising from those topics that can impact on people with protected characteristics or are disadvantaged in London disproportionately or differentially.

Figure 7: Integrated Impact Assessments framework.



This allows us to integrate perspectives coming from each of the three IIA themes, gaining a holistic view of potential impacts, identifying interdependence of impacts (for example people who are more vulnerable to poor air quality, with low access to health services), and finally allowing more targeted mitigations.

Table 2 sets out the remit of the assessment against the central themes of Economy, Environment and People.

Table 7: Overview of the IIA assessment remit

Assessment	Remit
Economy	Identifies and assesses the impacts on London's Economy as a result of the Proposed Changes and identifies potential impacts on small to medium sized enterprises (SMEs) and key groups including PHVs and van drivers that operate in the area.
Environment	Identifies and assesses the impacts across a range of environmental issues as a result of the Proposed Changes, including air quality, noise, and climate change.
People (Health and Equality)	Identifies and assesses the impacts on people, including those groups with protected characteristics or who are socio-economically disadvantaged.

3.2 Purpose of the IIA

The IIA process is a tool for identifying key impacts associated with the Proposed Changes, including how potential negative impacts could be avoided or mitigated where possible, and how the potential positive impacts resultant of the Proposed Changes could be enhanced. The IIA report brings together the findings of each of the assessments into one integrated document, where they are reported under the three themes Economy, Environment and People. The IIA informs the development of the proposals and the decision for their implementation.

3.3 IIA Assessment Framework

This section presents the scope and methodology of the IIA. It includes the topics assessed and those scoped out, quantification of effects, temporal and geographic scope and cumulative assessment.

3.3.1 Assessment objectives

An IIA framework and assessment is led by a set of objectives against which the potential impacts are assessed. The MTS forms a key part of the policy framework which supports and shapes London's social and economic development. The IIA for the Mayor's Transport Strategy (2017) set clear objectives which aligned with those set by the MTS. These objectives formed the basis for subsequent IIAs for changes to the Congestion Charging scheme.

This IIA is based on those same objectives to ensure consistency with previous IIAs and that the outcomes align with MTS policy:

- to maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong diverse and resilient economy providing opportunities for all
- to reduce emissions and concentrations of harmful atmospheric pollutants particularly in areas of poorest quality and reduce exposure
- to ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks
- to minimise noise and vibration levels and disruption to people and communities across London and reduce exposure
- to contribute to safety and security and perceptions of safety
- to maximise accessibility for all in and around London and to enhance and improve connectivity for all to and from and within and around London including expanding travel horizons for those requiring safe, accessible travel options
- to ensure London has socially integrated communities which are strong, resilient and free of prejudice
- to improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the city and between communities, reducing emissions of harmful atmospheric pollutants in areas of poorest air quality as well as minimising noise and vibration levels, as well as disruption to people and communities across London
- to make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population

3.3.2 Scoping of the Assessment

Table 8 sets out the topics assessed across the three themes of Economy, Environment and People. Table 9 identifies the IIA objectives for each topic with an explanation of the justification for this assessment and potential impacts that will be assessed.

Table 8: Summary assessment topics scope table

Theme	London's Economy	London's Environment	London's People
Topics	Employment Businesses London's Wider Economy	Air Quality Climate Change Noise	Crime Reduction and Safety Accessibility, Connectivity and Social Integration Health and Health Inequalities Access to Jobs and Training Protected Characteristics and disadvantaged groups

Table 9: Scope of IIA assessments

Theme	IIA Objective		Justification	Impacts Assessed
London's Economy	Employment	To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong diverse and resilient economy providing opportunities for all.	Changes to the Congestion Charge may impact on access to employment and employment opportunities.	Impact on access to work by private vehicles Impact on those that use a vehicle for their work, including van drivers and PHV drivers
	Businesses		Changes to the Congestion Charge may impact on business costs and operations.	Impact on businesses due to higher costs to run the business or services Impact on businesses due to higher financial costs to users and changes in their commuting patterns Impact on businesses due to changes to journey times and journey time reliability Impact on businesses due to employees' commuting patterns Impact on businesses due to changes to the street environment in the CCZ
	London's Wider Economy		Changes to the Congestion Charge may impact London's economy, given the impact on journey and travel times.	Impact of change on London's economy overall due to increased cost of driving Impact on domestic and international tourism Impact on wider supply chain and the economy

Theme		IIA Objective	Justification	Impacts Assessed
London's Environment	Air Quality	To reduce emissions and concentrations of harmful atmospheric pollutants particularly in areas of poorest quality and reduce exposure.	Changes in traffic levels and distribution within the CCZ may lead to changes in emissions of nitrogen dioxides (NO _x) and particulates, which can have impacts on health.	Impacts on Air Quality given changes to NO _x and particulates.
	Climate Change	To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.	Changes in traffic levels within the CCZ may lead to changes in emissions of carbon dioxide (CO ₂) which is a greenhouse gas contributing to global warming and climate change. These changes may influence the ability to adapt and become more resilient to the impacts of climate change and extreme weather events.	Impacts on Climate Change given changes to CO ₂ emissions.
	Noise	To minimise noise and vibration levels and disruption to people and communities across London and reduce exposure.	Changes in traffic levels as well as changes in the ICE/EV fleet composition in the CCZ could impact noise levels on London's roads.	Impact on traffic noise levels.

Theme		IIA Objective	Justification	Impacts Assessed
London's People	Crime Reduction and Safety	To contribute to safety and security and perceptions of safety.	Changes in traffic volume and patterns may impact road safety. Changes to travel mode may impact vulnerable groups disproportionately.	Impact on travel patterns for those with a fear for their safety on public transport. Impact on road safety.
	Accessibility, Connectivity and Social Integration	To maximise accessibility for all in and around London and to enhance and improve connectivity for all to and from and within and around London including expanding travel horizons for those requiring safe, accessible travel options. To ensure London has socially integrated communities which are strong, resilient and free of prejudice.	Changes to the Congestion Charging scheme may impact how people travel in London, including use of active and sustainable modes, the viability of travel by private modes, the provision of services, and the availability and cost of travel to key facilities. This may impact how people live, socialise and spend recreation time, and social integration generally.	Impact on travel by active and sustainable modes Impact on charities delivering services or transport of goods/equipment to vulnerable people in charging hours. Impact on community groups and access to community groups operating within CCZ. Impact on access to religious services during charging hours. Impact on access to education for people who may be reliant on private transport for travel.

Theme		IIA Objective	Justification	Impacts Assessed
	Health and health Inequalities	To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities, reducing emissions of harmful atmospheric pollutants in areas of poorest air quality as well as minimising noise and vibration levels, as well as disruption to people and communities across London.	Changes to the Congestion Charging scheme may potentially impact people's health, and health inequalities that are experienced disproportionately by people with protected characteristics or vulnerable groups, including changes in air quality, noise and access to health and social care.	Impact on mental and physical health as a result of changes in traffic, including impacts of air quality and noise. Impact on access to health and social care for people who require access by private vehicles during charging hours.
	Access to jobs and training	To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong diverse and resilient economy providing opportunities for all.	Changes to the Congestion Charge may impact people in low-income jobs who need to drive to work during charging hours.	Impact on carers providing services to vulnerable groups by private vehicle, where charge is not covered by their employer. Impact on people that need to access work in the CCZ by private vehicle. Impact on low-income workers or PHV drivers that require travel to work in the CCZ.
	Protected characteristics and disadvantaged groups	To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population.	Changes to the Congestion Charge may have a disproportionate or differential Impact on people in London with protected characteristics or who are disadvantaged.	Impact on protected characteristic groups and disadvantaged groups assessed across all People topics. Impacts for protected characteristic and disadvantaged groups resultant of proposed changes which do not fall within any specific topic are also assessed against this objective.

Table 5 explains the topics that were scoped out of the IIA with an explanation of why they have been excluded.

Table 10: Topics scoped out of IIA assessments

Assessment	Scoped out impacts	Justification
Economy	Impacts on infrastructure	Proposed Changes do not require or provide new infrastructure.
	Sustainable land use	Proposed Changes could enable future reallocation of road space. Unlikely to have any impact on overall patterns of development.
	Housing supply, quality, choice and affordability	No impact expected on housing provision.
	Cultural assets	Proposed Changes have no impact on heritage or cultural assets.
Environment	Energy use and supply	The overall impacts on energy use and supply due to additional uptake of EVs given the Proposed Changes are likely to be small scale and challenging to assess.
	Flood risk, geology and soils	The Proposed Changes are not proposing alterations to the built environment which may lead to changes in flood risk, or impacts on/use of London's geology and soils.
	Historic Environment	It is not anticipated that the Proposed Changes to the scheme will lead to changes in pollutants that negatively impact buildings in the CCZ, to a level detrimental to the historic environment.
	Materials and Waste	While the Proposed Changes may lead to an increase in the number of EVs being purchased for travel within the CCZ, this proposal does not include a scrappage scheme, meaning fewer vehicles are likely to be scrapped compared to previous schemes, and thus a lower level of waste.
	Natural Capital and Natural Environment	There is not anticipated to be a significant impact on pollution deposition on protected habitats due to changes in traffic flow and proportion of electric/ICE vehicles.
	Biodiversity	There is not anticipated to be an impact on ecological sites sensitive to air pollution (Special Areas of Conservation, Special Protection Areas, SSSI, Ramsar, National Nature Reserves) as resultant of changes in air pollution.
People (Health and Equality)	Design of the public realm and placemaking	Impacts of the Proposed Changes likely to be indirect and changes which may occur to

Assessment	Scoped out impacts	Justification
		public realm and placemaking not known. Challenging to assess to a significant extent.

3.3.3 Protected Characteristics

As a public authority exercising public functions, we have a duty under section 149 of the Equality Act, the Public Sector Equality Duty (PSED) to have due regard to the need to:

1. Eliminate unlawful discrimination, harassment, victimisation, and any other conduct prohibited by or under the Act
2. Advance equality of opportunity between people who share a protected characteristic and people who do not share it by:
 - removing or minimising disadvantages experienced by people that are connected to that protected characteristic
 - taking steps to meet the needs of people with protected characteristics that are different from the needs of people without the characteristic
 - encouraging people with protected characteristics to participate in public life or other activities in which participation by such people is disproportionately low
3. Foster good relations, between people who share a 'protected characteristic' and people who don't

The Equality Act identifies nine protected characteristics:

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnerships
- Pregnancy and Maternity
- Race
- Religion or Belief
- Sex
- Sexual Orientation

The People category has included an assessment of these 'protected characteristic' groups. This enabled us to understand how the proposals could impact these groups and individuals.

The duty in respect of the protected characteristic relating to marriage and civil partnership is to eliminate unlawful discrimination and other prohibited conduct under the Act only. This protected characteristic has been scoped out of this assessment as it is not anticipated that the Proposed Changes will be of relevance.

As a functional body of the Greater London Authority (GLA) we have also considered the wider impacts of the Scheme on other groups who are disadvantaged in London, and as such have included consideration of the potential impact on:

- People on low incomes;
- Asylum seekers and refugees;
- Homeless people; and
- Carers (paid, voluntary, informal and personal assistants (PAs).

3.3.4 Quantification of effects

The potential impacts have been determined using two assessment parameters: the scale of the impact against the sensitivity of the receptor.

- **Scale:** this looks at the extent to which an assessment group would be impacted, positively or negatively, by the proposals including the range, in terms of area, and number/proportion of impacted individuals. It takes into account duration of impact where relevant
- **Sensitivity:** this looks at the severity of the impact, and how the assessment groups might respond, whether they are able to absorb or adapt to the proposed changes where negatively impacted. If the affected group has no alternatives and, as such, will be greatly impacted by the proposal then it is considered to have a high sensitivity to the Proposed Changes. Where they are able to continue to function as normal, sensitivity would be low

The People Assessment follows the methodology set out above when assessing against the relevant objectives. However, to capture the effects on protected characteristic and disadvantaged groups within Section 10.3.5, the assessment has identified whether the impact is likely to have a disproportionate or differential effect, described as follows:

- **Disproportionate:** where there is a proportionately greater impact on members of an equality group than on other members of the general population in a particular area
- **Differential:** an impact which affects members of an equality group differently from the rest of the general population because of specific needs or a recognised vulnerability

The is shown in the impact rating matrix (Table 11). The impact is scored using a seven-point scale from -3 to +3 (Table 12).

Table 11: Impact rating matrix

Scale of impact					
Sensitivity		No change	Low	Medium	High
	High	Neutral	Minor or moderate	Moderate or major	Major
	Medium	Neutral	Minor	Moderate	Moderate or major
	Low	Neutral	Neutral or minor	Minor or moderate	Minor or moderate

Table 12: Scale of overall effect of impact (rating)

Scale of overall impact	Rating	Description
Major positive	+3	Contributes greatly towards achieving the IIA objective
Moderate positive	+2	Contributes to achieving the IIA objective
Minor positive	+1	Contributes to achieving the IIA objective but with a limited scope (only for some groups and over the short term)
Neutral	0	No significant positive or negative impact
Minor negative	-1	Conflicts with the IIA objective but with a limited scope (only for some groups and over the short term)
Moderate negative	-2	Conflicts with the IIA objective
Major negative	-3	Greatly hinders or prevents the achievement of the IIA objective

3.3.5 Cumulative impacts

The Congestion Charge is one of several road user charging schemes in London, including the ULEZ, Low Emission Zone (LEZ), and Silvertown and Blackwall Tunnels User Charge. Each of these schemes has a distinct primary objective, and specific charging rules including as to chargeable vehicles, charge levels, hours of operation, discounts and exemptions.

It is recognised that in some instances, there may be vehicles which are subject to other road user charges in London in addition to the Congestion Charge. However, it has been concluded that there are unlikely to be any new or substantially different cumulative effects associated with the proposed changes to the Congestion Charge (when compared to the 'Do Nothing' scenario from 2 January 2026) and interaction with other schemes including ULEZ, LEZ and Tunnels User Charge, and as such cumulative impacts are outside of the scope of this IIA.

3.3.6 Temporal scope

The Proposed Changes, if approved, will come into effect from 2 January 2026, except for the changes to the Residents' Discount which will come into effect from 1 March 2027.

The assessment has considered a temporal scope of 10 years (up to 2035). In line with the MTS Proposals 20 and 24.1, it is anticipated that the Congestion Charging scheme and the Proposed Changes will be kept under review including for the purpose of considering whether it and other road user charging schemes remain effective in addressing the triple challenges of toxic air pollution, the climate emergency and traffic congestion. Further changes may be proposed within the assessment timeframe. Such changes would be subject to further assessments and public consultation.

3.3.7 Geographical scope

The geographical scope of the assessment is the CCZ, which is shown in Figure 8. The CCZ covers all or some of the following boroughs, referred to collectively as the 'host boroughs' within this assessment:

- City of London
- City of Westminster
- London Borough of Camden
- London Borough of Lambeth
- London Borough of Southwark
- London Borough of Hackney
- London Borough of Islington
- London Borough of Tower Hamlets

The study area includes the CCZ, host boroughs and Greater London. However, the geographical scope for each topic baseline and assessment of impacts will depend upon the data sets used for each evaluation, including emissions and traffic, both baseline data and assessment modelling.

Figure 8: Congestion Charge Zone (CCZ) area in central London

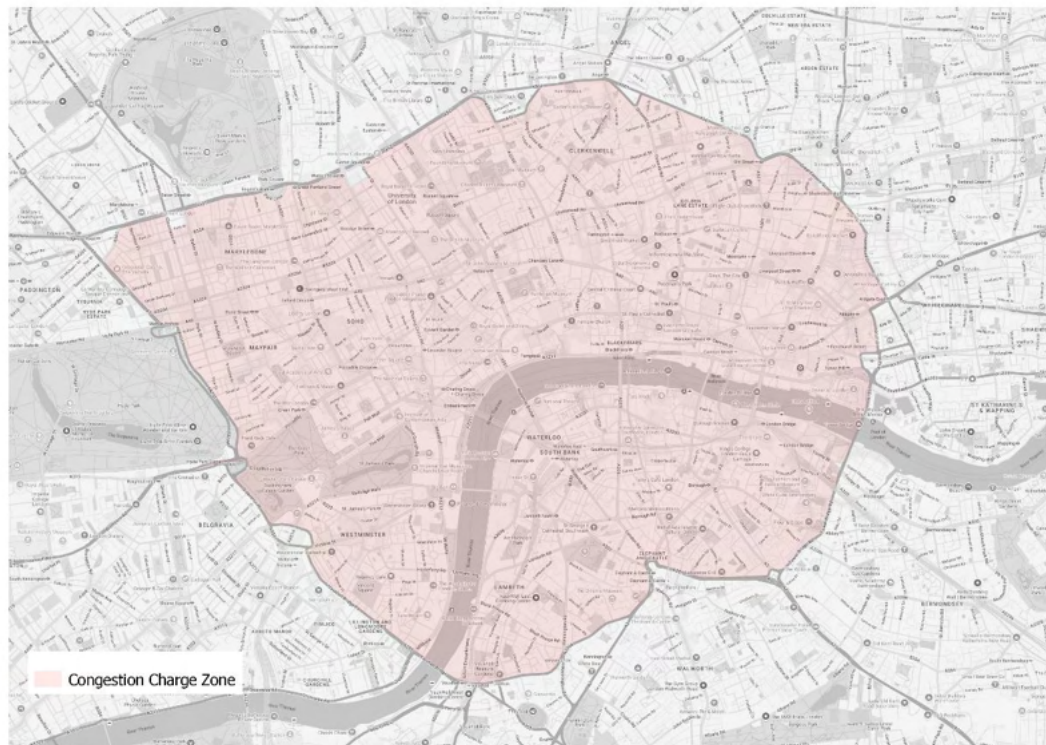
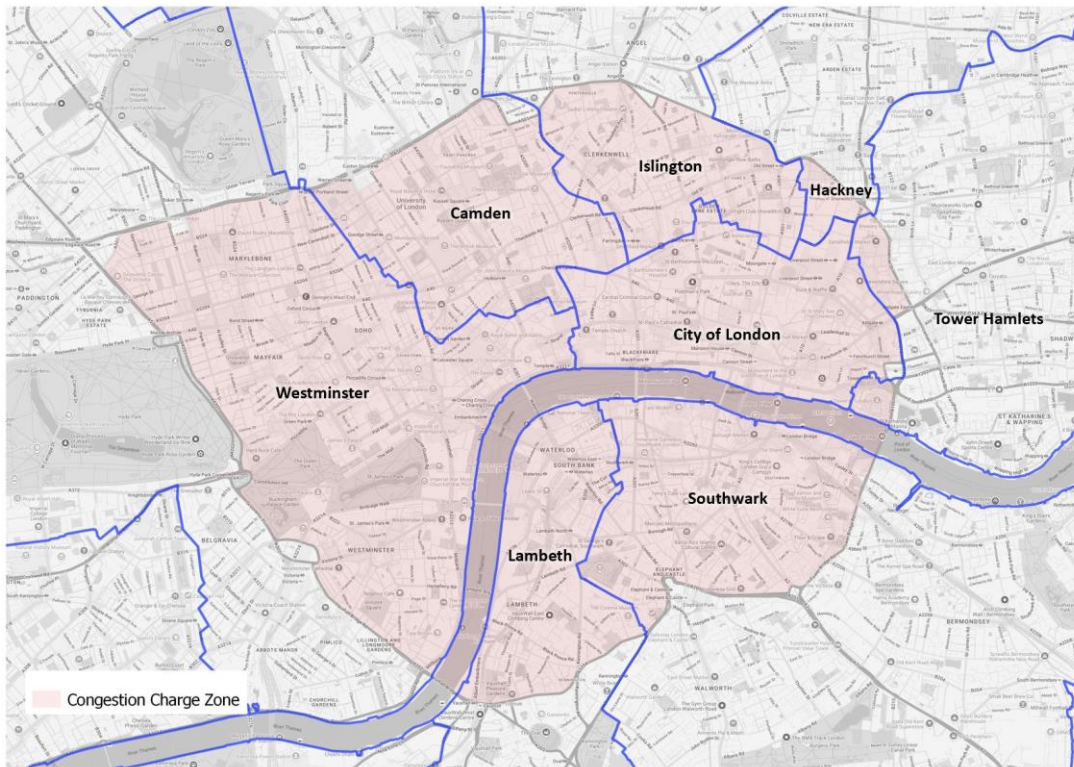


Figure 9: Host boroughs map



3.4 Stakeholder engagement

This IIA has been informed by a number of documents and data analysis, including previous consultations on changes to the scheme.

A public and stakeholder consultation on the Proposed Changes ran for eleven weeks from 27 May 2025. As part of this process, engagement was undertaken to inform our assessments and feed into finalising the IIA post consultation.

A public questionnaire, which was made available on our consultation webpage, and a copy of which is provided in the Consultation Report (provided at Appendix B of the Report to the Mayor) invited respondents to share their views on the Proposed Changes, and asked them to optionally identify any potential impacts arising from the Proposed Changes which are relevant due to a protected characteristic they, or others may have.

The Report to the Mayor (which this IIA is provided as an appendix to) at Chapter 3 details the public consultation and stakeholder engagement undertaken. This includes information on how the consultation was promoted, the engagement which took place and information on the number of public and stakeholder responses. Additionally, the consultation report summarises the responses received from stakeholders. Within Chapter 5 of the document, our response to the public and stakeholder feedback is provided.

4. Suggested Modifications to our Proposals Post-Consultation

We have reviewed all responses received from the public and stakeholders and have considered whether there is a need to mitigate the impacts of the proposals and propose some modifications. During consultation, certain stakeholders raised concern regarding the potential impacts of the changes to the Residents' Discount on low-income and disabled residents of the CCZ. As such, we have developed two mitigations (A and B below).

Mitigation A addresses concerns related to potential impacts on low-income and disabled residents, to further support residents who may be less able to afford or access an EV but may require a vehicle to travel and be unable to avoid the CCZ. Mitigation B also responds to the issue concerning low-income residents who cannot access an EV, while it may also provide an alternative to car ownership for those that live in the CCZ.

These additional mitigations have been reflected in the IIA where relevant to consider how, if approved, they would help to mitigate the identified impacts.

A. Extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030

We propose to extend the current vehicle eligibility criteria to qualify for the Residents' Discount for new applicants in receipt of certain benefits (including low-income). The new vehicle eligibility criteria are proposed to apply from 1 March 2027, however, in response to feedback we intend to adjust the rules for residents in receipt of certain benefits. These residents need not have an EV in order to qualify for the Residents' Discount between 1 March 2027 and 4 March 2030 (i.e. their vehicle's fuel type will not be relevant to determining eligibility for the Residents' Discount) and will receive grandparent rights going forward (a 90 per cent discount regardless of their vehicle's fuel type) if registered before the later date. The qualifying benefits are :

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

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

This modification would serve as a mitigation for residents in receipt of certain benefits, including low-income and disabled residents, due to their potential reduced ability to own or access an EV. For disabled residents applying after March 2027, if they do not receive the 100 per cent Blue Badge discount or disabled tax class vehicle exemption, and for whom switching modes is unviable, the reduced ability to own an EV may be resultant of factors including a lack of accessible charge points, the potential barriers relating to the technology, and need for an adapted vehicle (in relation to availability and associated costs for adaptations).

The draft IIA recognised that our proposals could have a potential minor negative impact on low-income residents, disabled people and older residents 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 100 per cent 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.

B. 100 per cent discount for car club EVs based in bays in the Residents' Discount zone

A specific new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone (the CCZ plus a buffer area) is recommended as a mitigation to the proposed changes to the Residents' Discount for existing and future residents including those on low incomes who may require a vehicle to travel and for whom it may be harder to access EVs, without which they would have to pay the full user charge for travel in the CCZ within charging hours from 2030. This discount will act as an incentive for residents to use these vehicles, rather than purchase a vehicle in advance of the Residents' Discount changes coming into place. The car club must be the registered keeper of the EV and the EV must be driven by the member of the car club. The discount excludes vehicles which are licensed as private hire vehicles (PHVs).

This mitigation is specifically intended for residents in the Residents' Discount zone who need to use a vehicle from time to time but are unable or do not wish to privately own or lease an EV. The rental cost of the car club EV and the 'back to base' nature of the hire arrangement mean that unnecessary mileage is unlikely to be incurred, thereby, reducing the discount's traffic and congestion impacts. For data protection and administrative reasons, the discount is not, however, limited to car club members who are residents in the Residents' Discount zone. We will not seek to collect data on individuals using this mitigation nor will we request that car clubs share any such data with us.

Car club EVs which are also licensed as PHVs are, however, excluded from this mitigation since they are likely to generate additional traffic and congestion in the CCZ given they will be driven in the zone without passengers for at least part of the time, and the rental costs will be offset by revenue from passengers. Residents who are also PHV drivers may continue to be able to benefit from the Residents' Discount, the 100 per cent Blue Badge discount or the exemption for wheelchair-accessible PHVs.

It is considered that this modification will help to further mitigate the impacts of 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 for the extended period). This would come into effect at the same time as most of the other changes, 2 January 2026.

5. Additional Information Post-consultation

During public and stakeholder consultation, some respondents raised issues relating to the draft IIA published as part of the consultation materials. We have reviewed the consultation responses and, where considered relevant, have made amendments to the IIA in response. The following key themes were raised in relation to our approach to assessing the impact of our proposals, and our response to this is provided below:

5.1 The IIA does not assess the impact of our proposals against present day conditions

To understand the effect of the proposals, we have assessed the impacts of implementing them versus not implementing them. Hence, the proposals are assessed against what would happen if no proposals were implemented ('Do Nothing'), not against a hypothetical scenario with a 100 per cent CVD after 2025 alongside our other proposals. Comparing against the situation today would not represent the actual effect of the proposals, as the methodology would not account for a major known change to the scheme rules that has been in place for some time (the end of the CVD on 25 December 2025).

5.2 The IIA does not consider the impact of our proposals outside of the CCZ

Impact assessments typically focus on the geographical area impacted by the proposals (which in this case is the CCZ, which covers around one per cent of the Greater London area). We do not consider that it would be informative to undertake full London-wide modelling of the consultation proposals. To do so would mean presenting a lot of information which has the potential to confuse, introduce complexity and detract from information which is needed to understand the consultation proposals themselves and their more specific impacts.

It is not disputed that EV PHVs (or vehicles in general) will likely drive the majority of the time outside the CCZ. It can be true both that the majority of emissions benefits of vehicles benefitting from a CVD are felt outside central London and that the impact is negligible in those areas due to the very small proportion of vehicles they represent in the vehicle fleet in that larger area. The number of vehicles which are EVs as a direct result of a CVD is even smaller given that the majority of vehicles seen in the CCZ are there infrequently, and therefore the charge is unlikely to be a significant factor in the wider decision or cost comparison when deciding whether to purchase an EV. Purchasing decisions for vehicles which more frequently operate in central London may be more directly influenced by a CVD, but this is a minority of EVs seen in the CCZ, leading to the conclusion that the impact of the CVD on air quality at a London-wide level is likely to be negligible. Providing London-wide figures is, therefore, considered to be disproportionate to the level of information required to submit an informed consultation response on the impact of the proposed changes to the Congestion Charging scheme, which operates in the central one per cent of London (21 square kms of more than 1500 square kms). As we explained in the additional information published on 18 July, to give a sense of scale, the request to undertake London-wide modelling would have entailed generating additional data and a programme of bespoke strategic model runs for impacts arising from 0.2 per cent of vehicles driven in Greater London.

5.3 The IIA does not assess the impact of a ‘Do Nothing’ scenario

The ‘Do Nothing’ scenario refers to the Congestion Charging scheme in the form it would exist from the first charging day of 2026 without any intervention. Effectively, it means that the charge level remains at £15 and the 100 per cent CVD comes to its planned end in December 2025. The proposals we consulted on would change this ‘Do Nothing’ scenario with the proposed introduction of a new CVD providing support for EV drivers for longer (as well as our other proposals). We have not undertaken a full impact assessment of the ‘Do Nothing’ scenario. The 2018 decision was fully supported by impact assessments (which recognised the potential negative financial impacts of ending the 100 per cent CVD) and the planned implementation of that decision in January 2026 forms our baseline. However, we are now proposing a new set of circumstances will take effect in January 2026 and have undertaken a full assessment of the impacts of our new proposals. The impact of moving from a 100 per cent CVD to no CVD (the ‘Do Nothing’ scenario) would serve no purpose in this consultation as it does not reflect our proposals, which have been fully assessed.

5.4 The IIA does not consider the impact of providing a 100 per cent discount

The scope of the IIA is the proposals rather than multiple alternatives (i.e. different percentages of discount) which are not being taken forward as part of the proposals. To assess alternatives which had been ruled out as proposals would have created confusion and unnecessary complexity as to which of the presented datasets were relevant to providing feedback on the proposal being consulted on. To ensure the accessibility of our consultations we aim to present clear, relevant supporting information which informs respondents about the impacts of the proposal being put forward. We seek to strike a balance between providing rigorous data and analysis and making technical information such as modelling accessible for non-technical respondents. Presenting full data and analysis for options not considered viable is not considered necessary to provide feedback on the proposals, and increases the volume and complexity of analysis to be read and digested, potentially limiting engagement with the consultation.

Additional data about the impact of the hypothetical scenario of the 100 per cent CVD continuing was provided pursuant to an Environmental Information Regulations (EIR) request during the consultation period. As our response was published on TfL’s transparency pages, we made this hypothetical scenario data available on the consultation portal so everyone who was interested in the consultation had equal access to it, but it was made clear that it did not inform the assessment of the consultation proposals we were putting forward in the IIA.

The consultation materials stated that continuing with a 100 per cent CVD was not compatible with the Congestion Charging scheme’s objectives based on the current number of EVs seen in the CCZ, with historical trends indicating that they would continue to increase. The growing number of EVs in the CCZ means that reintroducing a 100 per cent discount would undermine the deterrent effect of the scheme, encouraging more vehicle entries and contributing to worsening traffic. A scenario with a 100 per cent CVD was, therefore, ruled out as a reasonable alternative and was not fully assessed.

We did, however, construct a hypothetical ‘100 per cent CVD continues’ scenario in which the CVD would not come to an end in December 2025 as a methodological stepping stone to estimate the

'Do Nothing' scenario. This '100 per cent CVD continues' scenario assumed a continuation of the current scheme rules, and would therefore follow the historical trends mentioned above.

The '100 per cent CVD continues' scenario was required as an interim step to assessing a genuine 'Do Nothing' scenario which accounted for the end of the CVD which was planned to take effect before the point of comparison with our proposals. We then created the 'Do Nothing' scenario, using monitoring data from past Congestion Charge changes and data from literature, to estimate how road users would respond to extra costs to drive in the CCZ under this scenario, to reflect the end of the CVD in December 2025.

As the '100 per cent CVD continues' scenario was a methodological stepping stone we did not undertake further refinement of the output or additional analysis beyond estimating the numbers of vehicles. It was a hypothetical scenario developed to help create the baseline for analysis.

6. Baseline

This chapter outlines the baseline for the assessment. It sets out the existing situation against which the impacts are assessed. It uses data collected from a range of sources including desktop research and modelling.

Section 6.1 provides a broad overview on the spatial context. The baseline is then split across the three themes for Economy, Environment and People in Sections 6.2, 6.3 and 6.4 respectively.

6.1 Spatial context

The CCZ as shown in Figure 8, comprises much of London's 'Central Activities Zone', which is London's globally iconic core and one of the world's most attractive and competitive business locations.⁸⁹ It includes the City of London ('the Square Mile'), national government and cultural institutions in the City of Westminster and the cultural districts of Soho, the Southbank and the retail and entertainment focused 'West End'. It also includes a wide range of culturally significant museums and galleries.

6.1.1 Transport connectivity in the CCZ

The CCZ is well served by public transport both within the CCZ but also from Greater London. Several terminus rail stations are located in the CCZ, including London Bridge, Waterloo, Liverpool Street, Charing Cross and Fenchurch Street. Victoria, Marylebone, Paddington, Kings Cross, Euston and St Pancras International stations are all located adjacent to, or within a short distance of the boundary of the CCZ. Collectively, these stations provide excellent connections across London, the UK and internationally (via Eurostar). They also provide direct access to London's airports including Heathrow, Gatwick, Luton and Stansted. All London Underground lines, the Elizabeth Line, and DLR and London Overground lines serve the CCZ providing fast and frequent connections across the CCZ and to and from surrounding areas.

Numerous bus routes run through and into the CCZ, providing connections to all parts of the city.

The Congestion Charging scheme works in combination with other TfL plans and policies. The reduction in the number of vehicles travelling across and within the CCZ has allowed for road space reallocation within the CCZ, leading to dedicated bus lanes to improve bus journey times and reliability.

River boat services provide connectivity from the CCZ to east and west London. The Thames also acts as an important shipping route, and as a physical barrier separating north and south London, cutting through the CCZ. Some of London's most iconic and important road bridges are located within or adjacent to the CCZ.

Travel by bike is well served across the London boroughs and within the CCZ. This cycle infrastructure has been enhanced and expanded in part due to the traffic reduction and subsequent

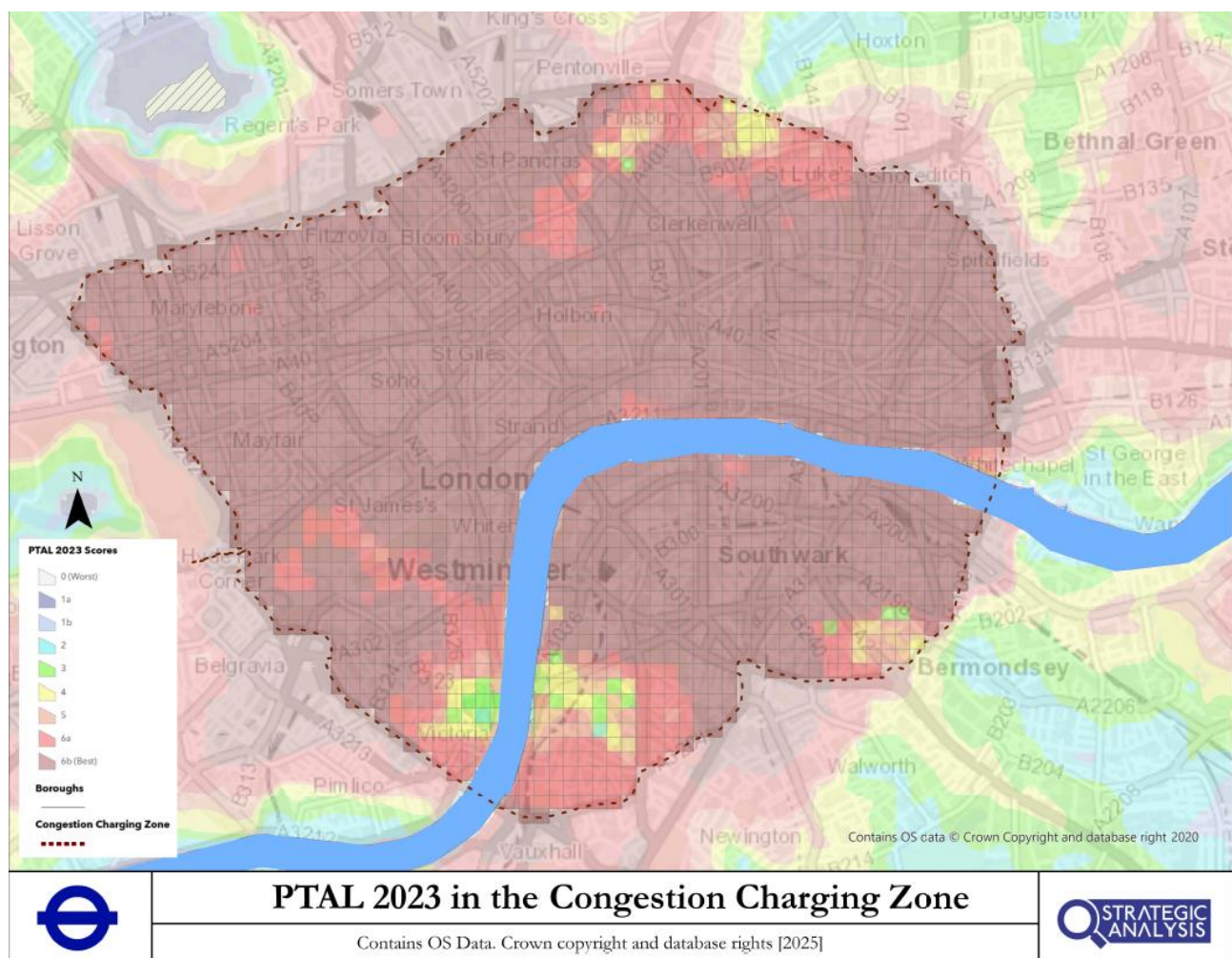
⁸⁹ Central Activities Zone Supplementary Planning Guidance, Greater London Authority, March 2016

road space reallocation benefits of the Congestion Charging scheme. A number of cycleways run thorough and into the CCZ, many of these routes being segregated from road traffic.

Our Santander Cycles operate within the CCZ, as well as other third party shared micro mobility modes such as dockless e-bikes and e-scooters. Furthermore, walking and wheeling within the CCZ is made easily accessible through wide and segregated paths, pedestrianised areas and the high number of crossings with pedestrian safety features such as crossing countdowns.

As shown in Figure 10, the excellent level of public transport connectivity within the CCZ means that the CCZ has an exceptionally high Public Transport Accessibility Level (PTAL) score with most areas having the highest score (6b).⁹⁰

Figure 10: Public Transport Accessibility Level (PTAL) score map



⁹⁰ Detailed and accurate measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability. The method is essentially a way of measuring the density of the public transport network at any location within Greater London.

This excellent public transport and active travel network leads to the CCZ having high levels of public transport and active travel use, and lower levels of car ownership and use than other areas of London. This is covered further in Section 6.4.

6.1.2 Facilities and services in the CCZ

The following figures shows services and facilities in the CCZ area, including education facilities, healthcare facilities, community and religious centres.

Figure 11: Education facilities in the CCZ

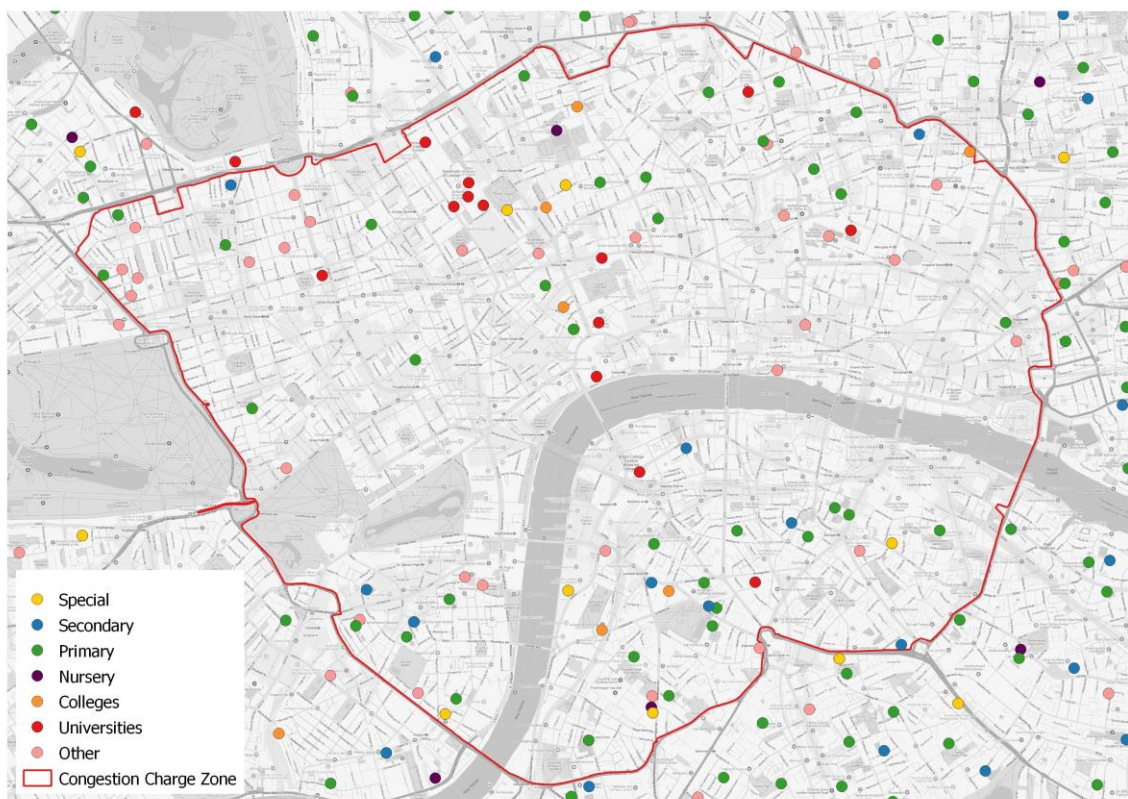


Figure 12: Healthcare facilities in the CCZ

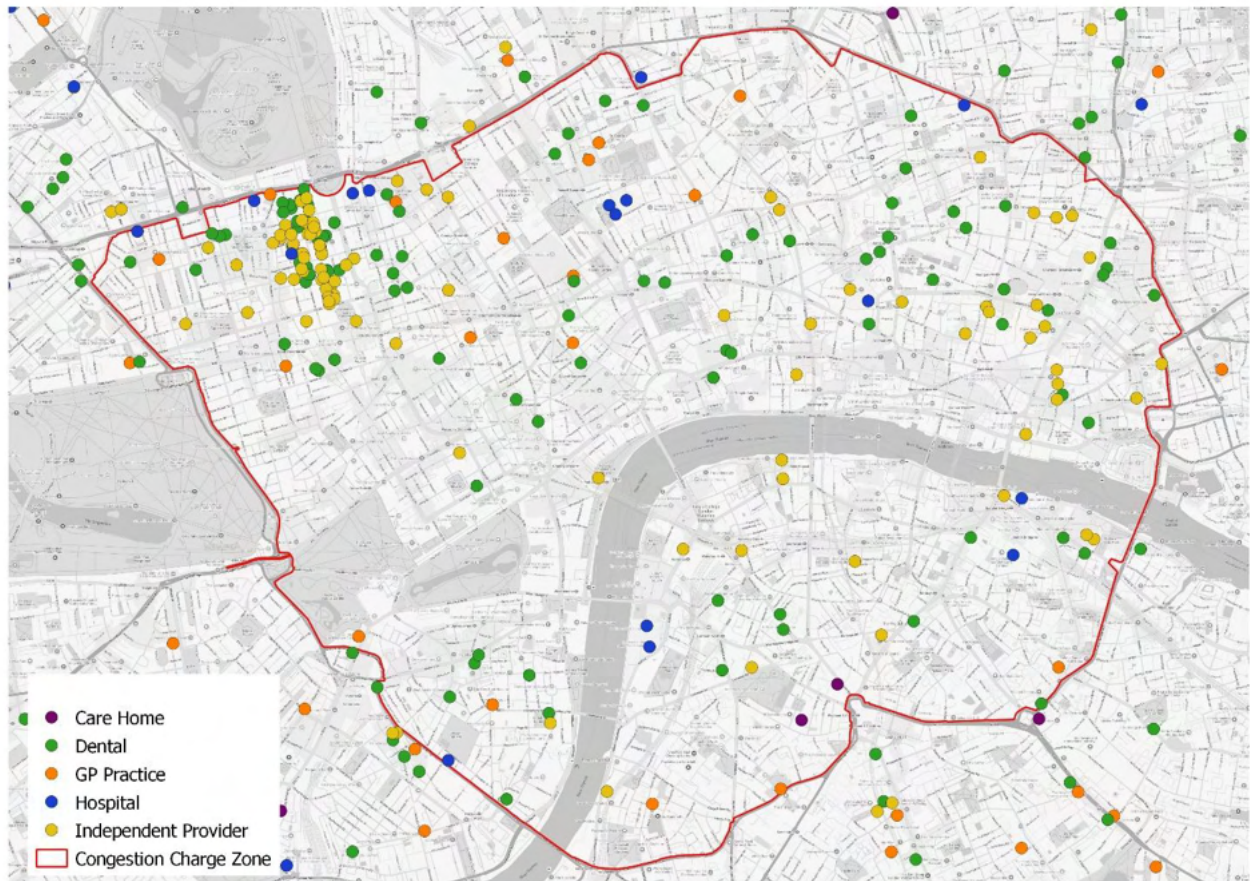
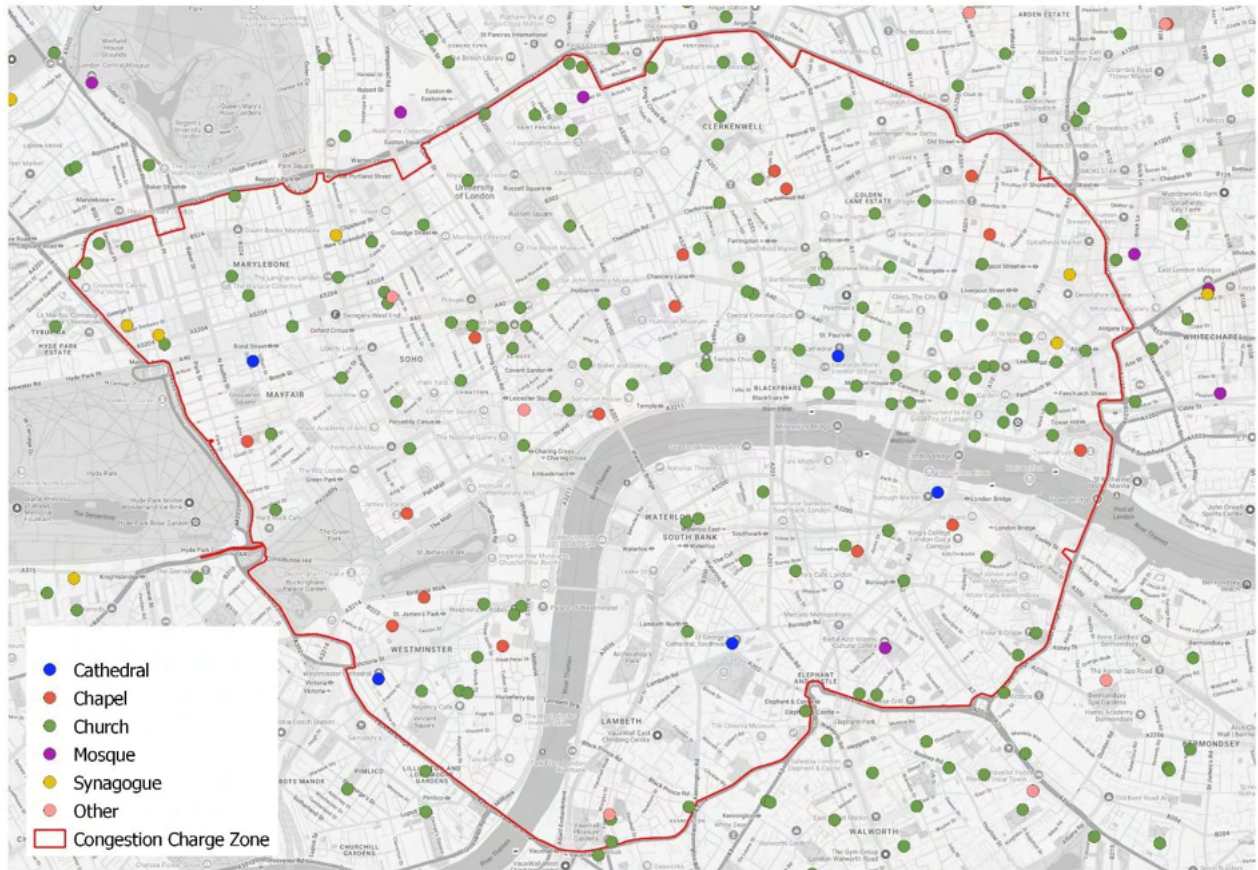


Figure 13: Community centres in the CCZ



Figure 14: Religious centres in the CCZ



6.2 Economy Baseline

This section sets out the baseline for the three Economy assessment topics: employment (those who travel to work in the CCZ), business (businesses that operate within the CCZ), and the wider economy. It is based on desktop research drawing on a range of data sources.

6.2.1 Employment baseline

6.2.1.1 Jobs in the CCZ

The Business Register and Employment Survey (2023) shows there are circa 2,000,000 employees in the CCZ (Table 13). The CCZ has the highest level of job density in London.

Circa 15 per cent of people working within the CCZ are employed in 'finance and insurance', making up the second highest proportion of employees in the CCZ, despite only seven per cent of local units being within this industry group. The data in Section 6.2.2.1 highlights that most of the local units (individual site e.g. shop, office, factory) in the CCZ are in 'Professional, scientific & technical activities', 'Information & communication' and 'Business administration & support services' (Table 20). As shown in Table 13, these industry groups make up circa 23 per cent, 14 per cent, and 11 per cent of employees in the CCZ respectively.

Table 13: Employees in CCZ by Broad Industry Group⁹¹

Industry Group	CCZ	CCZ %	London	London %
1: Agriculture, forestry & fishing (A)	260	0%	1,500	0%
2: Mining, quarrying & utilities (B,D and E)	11,820	1%	34,000	1%
3: Manufacturing (C)	16,460	1%	119,000	2%
4: Construction (F)	36,765	2%	200,000	4%
5: Motor trades (Part G)	1,105	0%	33,000	1%
6: Wholesale (Part G)	33,280	2%	153,000	3%
7: Retail (Part G)	78,165	4%	387,000	7%
8: Transport & storage (inc. postal) (H)	31,750	2%	246,000	4%
9: Accommodation & food services (I)	145,220	7%	440,000	8%
10: Information & communication (J)	290,465	14%	520,000	9%
11: Financial & insurance (K)	306,685	15%	435,000	8%
12: Property (L)	58,140	3%	152,000	3%
13: Professional, scientific & technical (M)	472,555	23%	831,000	15%
14: Business administration & support services (N)	233,010	11%	599,000	11%
15: Public administration & defence (O)	92,375	4%	256,000	4%
16: Education (P)	78,695	4%	390,000	7%
17: Health (Q)	105,855	5%	612,000	11%
18: Arts, entertainment, recreation & other services (R,S,T and U)	94,100	5%	291,000	5%

⁹¹ ONS (2023), Business Register and Employment Survey

6.2.1.2 Employment by Occupation

Table 14 shows that a higher proportion of residents of the CCZ are employed in jobs which may be higher income, such as 'Managers, directors and senior officials' and 'Professional occupations' than the rest of London. Westminster has the highest percentage of residents in potentially higher earning jobs within the host boroughs. Conversely, CCZ residents are less likely to be employed in potentially lower income jobs such as 'elementary occupations' and 'process, plant and machine operatives' roles than in London as a whole.

Table 14: Employment by occupation of residents⁹²

	Camden	City of London	Hackney	Islington	Lambeth	Southwark	Tower Hamlets	Westminster	CCZ	London
Managers, directors and senior officials	17.8%	20.7%	13.9%	15.2%	14.1%	13.8%	13.3%	22.5%	18.5%	14.6%
Professional occupations	34.4%	43.9%	29.8%	34.2%	30.2%	30.6%	31.5%	30.6%	35.0%	25.8%
Associate professional and technical occupations	18.7%	19.2%	20.6%	19.9%	18.9%	17.3%	17.9%	17.3%	17.6%	15.3%
Administrative and secretarial occupations	6.2%	5%	7.0%	6.4%	6.9%	6.9%	7.2%	6.6%	6.4%	8.5%
Skilled trades occupations	3.7%	1.8%	4.8%	4.3%	5.2%	4.8%	4.8%	3.4%	3.3%	7.5%
Caring, leisure and other service occupations	6.1%	2.8%	7.3%	5.9%	7.2%	7.7%	6.0%	6.1%	5.5%	7.7%
Sales and customer service occupations	5.0%	2.3%	5.4%	4.9%	4.9%	5.2%	6.7%	5.1%	4.8%	6.3%
Process, plant and machine operatives	2.9%	0.9%	3.4%	3.0%	3.4%	3.6%	4.5%	2.7%	2.7%	5.0%
Elementary occupations	5.2%	3.3%	7.9%	6.3%	9.4%	10.1%	8.1%	5.7%	6.3%	9.2%

⁹² ONS (2021) Census: Occupation

6.2.1.3 Mode of travel to work in the CCZ

Table 15 shows that public transport is the most common mode of travel to work for Londoners who live or work in the CCZ according to London Travel Demand Survey (LTDS) data. It shows that 44 per cent of CCZ residents, and 82 per cent of all London residents working in the CCZ use public transport to travel to work. With regard to all London residents who work within the CCZ, 14 per cent walk or cycle to work while 50 per cent of journeys to work by CCZ residents are walking or cycling journeys.

Private transport is the least common method of travel to work. Only six per cent of Londoners living within the CCZ and four per cent of all Londoners who work in the CCZ commute to work by private transport.

Table 15: Main mode of travel to work for Londoners who work within the CCZ⁹³

	Walk/Cycle	Public Transport	Private Transport
All London residents	14%	82%	4%

Table 16: Main mode of travel to work for CCZ residents⁹⁴

	Walk/Cycle	Public Transport	Private Transport
CCZ residents	50%	44%	6%

6.2.1.4 Private Hire Vehicles (PHVs)

Table 17 shows that most PHV operators are small businesses with almost 77 per cent having only a maximum of 10 PHVs available to them to carry out PHV bookings.⁹⁵ TfL's Licensing and Regulation data shows a declining trend in the number of licensed PHV operators since 2012 from 3,164 operators in 2012 to 1,785 operators in 2025. However, the number of licensed PHVs shows an increase in the same period from 53,960 licensed vehicles in 2012 to 96,788 licensed vehicles in 2025.

Table 17: Licensed private hire operators split by tier⁹⁶

Tier	Maximum number of PHVs available	PHV Operators	Percentage
1	0-10 PHVs	1,367	76.58%
2	11-20 PHVs	177	9.92%
3	21-50 PHVs	145	8.12%
4	51-100 PHVs	79	4.43%

⁹³ LTDS (2-year average) 2022/23-2023/24

⁹⁴ LTDS (2-year average) 2022/23-2023/24. Note small sample size

⁹⁵ TfL Licensing and Regulation data, February 2025

⁹⁶ TfL Licensing and Regulation data, February 2025

Tier	Maximum number of PHVs available	PHV Operators	Percentage
5	101-500 PHVs	13	0.73%
6	501-1,000 PHVs	0	0.00%
7	1,001-10,000 PHVs	2	0.11%
8	10,000+ PHVs	2	0.11%
	Total	1,785	100%

TfL Licensing and Regulation data from shows that as of February 2025 there were:

- 107,998 licensed PHV drivers,
- 96,788 licensed PHVs,
- 1,787 licensed private hire operators, and
- 397 designated wheelchair accessible PHVs, which was 0.41 per cent of the total PHV fleet.

Most of the PHV drivers work with one or multiple of operators.

TfL Licensing and Regulation data also shows that as of January 2025, 27 per cent of PHVs are electric, up from 25.7 per cent in November 2024 (Table 18). Historical data shows that there is a month on month increase of fully electric fleet since June 2022 (11 per cent in June 2022 to 27 per cent in January 2025). TfL data also shows that when comparing an average day in September, electric PHV captures have increased from 23 per cent in 2022 to 32 per cent in 2024 in the CCZ during charging hours.

Table 18: PHV fuel type breakdown⁹⁷

PHV Fuel Type	Jan-25		Dec-24		Nov-24	
	Number	%	Number	%	Number	%
Electric	26,130	27.0%	25,407	26.4%	24,695	25.7%
Total	96,828	100.0%	96,387	100.0%	96,044	100.0%

TfL Licensing and Regulation data shows that the proportion of electric vehicles in new PHV registrations is also increasing, with 71 per cent of new registrations in January 2025 being electric (Table 19).

⁹⁷ TfL Licensing and Regulation data, February 2025

Table 19: New PHV registrations⁹⁸

Proportion of new registrations in year so far	Jan 25	Dec 24	Nov 24
Electric	71%	69%	69%
Electric Hybrid (includes petrol and diesel electric hybrids)	14%	31%	31%

6.2.2 Business baseline

6.2.2.1 Business types and numbers within the CCZ

The 2024 ONS data on UK Business (Table 20) shows that 'Professional, scientific & technical' is the most common industry subsector of local units in London (19 per cent) and the CCZ (26 per cent). The second and third largest industry subsectors in the CCZ are 'Information & communication' (13 per cent) and 'Business administration and support services' (11 per cent) while in London these are 'Construction' (11 per cent) and 'Information & communication' (11 per cent).

Table 20: Number of VAT and/or PAYE based local units by broad industry group⁹⁹

Industry Group	CCZ	CCZ %	London	London %
1: Agriculture, forestry & fishing (A)	175	0%	895	0%
2: Mining, quarrying & utilities (B,D and E)	1,450	1%	3,140	1%
3: Manufacturing (C)	2,565	2%	14,950	3%
4: Construction (F)	6,275	5%	62,790	11%
5: Motor trades (Part G)	390	0%	8,065	1%
6: Wholesale (Part G)	4,450	3%	22,740	4%
7: Retail (Part G)	8,570	6%	53,955	9%
8: Transport & storage (inc. postal) (H)	2,090	2%	18,850	3%
9: Accommodation & food services (I)	7,315	5%	36,695	6%
10: Information & communication (J)	18,235	13%	63,125	11%
11: Financial & insurance (K)	9,250	7%	16,550	3%
12: Property (L)	8,445	6%	32,325	5%
13: Professional, scientific & technical (M)	34,475	26%	110,500	19%
14: Business administration & support services (N)	15,280	11%	57,900	10%
15: Public administration & defence (O)	410	0%	1,710	0%
16: Education (P)	2,170	2%	13,055	2%
17: Health (Q)	3,800	3%	27,320	5%
18: Arts, entertainment, recreation & other services (R,S,T and U)	9,835	7%	44,840	8%

Table 21 shows the number of local units in the CCZ by employment size band. It shows that more than 80 per cent of the local units in the CCZ are micro businesses, a lower percentage than London wide (87 per cent).

⁹⁸ TfL Licensing and Regulation data, February 2025

⁹⁹ ONS (2024), UK Business Counts

Table 21: Number of VAT and/or PAYE based local units by employment size bands.¹⁰⁰

Area	Micro (0 to 9)	Small (10 to 49)	Medium-sized (50 to 249)	Large (250+)	Total
CCZ	108,595	20,240	5,115	1,220	135,170
London	511,840	61,735	13,270	2,560	589,405

Table 22 shows the breakdown of local units in the smallest size band (micro, 0 – 9 employees) by industry sector. The highest proportion of micro businesses in the CCZ are in 'Professional, scientific & technical' (26 per cent), 'Information & communication' (13 per cent) and 'Business administration & support services' (11 per cent). This is a similar picture London wide, except that 'Construction' is also one of the more common subsector types for micro businesses.

Table 22: Number of micro local units (0-9 employees) by broad industry group¹⁰¹

Industry Group	CCZ	CCZ %	London	London %
1: Agriculture, forestry & fishing (A)	155	0%	815	0%
2: Mining, quarrying & utilities (B,D and E)	1,295	1%	2,640	1%
3: Manufacturing (C)	2,275	2%	13,065	3%
4: Construction (F)	5,625	5%	60,170	12%
5: Motor trades (Part G)	370	0%	7,340	1%
6: Wholesale (Part G)	3,760	3%	19,550	4%
7: Retail (Part G)	7,025	6%	45,825	9%
8: Transport & storage (incl. postal) (H)	1,795	2%	16,820	3%
9: Accommodation & food services (I)	3,605	3%	25,060	5%
10: Information & communication (J)	14,490	13%	56,930	11%
11: Financial & insurance (K)	7,060	7%	13,505	3%
12: Property (L)	7,460	7%	29,815	6%
13: Professional, scientific & technical (M)	28,645	26%	100,785	20%
14: Business administration & support services (N)	12,160	11%	50,410	10%
15: Public administration & defence (O)	155	0%	630	0%
16: Education (P)	1,590	1%	8,340	2%
17: Health (Q)	2,860	3%	19,680	4%
18: Arts, entertainment, recreation & other services (R,S,T and U)	8,275	8%	40,460	8%

6.2.2.2 Mode of travel to CCZ for leisure purposes

Table 23 shows that only three per cent of leisure trips with a destination in the CCZ are made by private transport.

¹⁰⁰ ONS (2024), UK Business Counts

¹⁰¹ ONS (2024), UK Business Counts

Table 23: London resident leisure trips with destination in CCZ by main mode¹⁰²

All London residents	
Public transport	48%
Private transport	3%
Walk/cycle	49%

6.2.2.3 Van fleets in London

The most recent data, from 2019 (Table 24) indicates that approximately 61 per cent of vans in London are owned by a business (sole trader, partnership or Ltd company) and 39 per cent are owned privately. That figure changes to 75 per cent and 25 per cent respectively when looking at van mileage in London, showing that business owned fleets have higher mileage per vehicle than privately owned vans. Given that the most recent data is pre-pandemic, the data may have changed.

Table 24: London van stock and mileage¹⁰³

	London van stock	London van mileage
Owned by private individual	39%	25%
Businesses van keepers	61%	75%

Table 25: Size of van fleets, business van keepers only¹⁰⁴

Fleet size	London van stock	London van mileage
1	22%	14%
2-5	34%	34%
6-10	11%	13%
11-20	8%	12%
21-50	7%	8%
51-100	7%	9%
100+	10%	8%

Data from the DfT Van Survey (2019) showed that:

- Two thirds (66 per cent) of vans kept by businesses in London were in fleets of up to 10 vans, with 34 per cent of vans in fleets of two to five vans
- Businesses with only one van made up 14 per cent of total van mileage in London, despite making up 22 per cent of total vans
- London's van keepers most frequently used vans for 'carrying equipment, tools and materials' (60 per cent of vans, 62 per cent of van mileage); followed by 'delivery/collection of goods' (21 per cent of vans, 29 per cent of van mileage)
- 10 per cent of vans were primarily used for private/domestic non-business use (5 per cent of van mileage)

¹⁰² LTDS (2-year average) 2022/23-2023/24

¹⁰³ DVLA Licensing data (2022) and DfT Van Survey (2019)

¹⁰⁴ DfT Van Survey (2019)

6.2.2.4 *Traffic and congestion cost*

Our Congestion Charging monitoring report¹⁰⁵ concludes that at the aggregate level for the whole CCZ, there is no measurable differential impact from the central London Congestion Charging scheme on business and economic activity based on analysis and surveys conducted by us. Business performance (sales and profitability) and business start-ups (VAT registrations) were stronger in the CCZ after the introduction of Congestion Charging compared to prior to charging. Retail businesses in the CCZ have outperformed retail businesses in inner and outer London since the introduction of congestion charging in terms of sales, profitability and employment growth. The same report shows that analysis of office and retail commercial property data shows stronger rental growth performance in the CCZ post charging than prior to the introduction of charging.

Several studies from across Europe have shown that retail businesses benefit from less traffic and from improvements to the quality of the streets. Research from Berlin,¹⁰⁶ London and Brussels¹⁰⁷ has shown that shop owners have overestimated the importance of car use for customers. While the average spend per visit was the highest among car users, most customers use active travel modes or public transport, and these customers visit the shops more frequently. The Berlin research showed that customers travelling by active modes, including walking and cycling or public transport contributed 91 per cent of total revenue. Research commissioned by us¹⁰⁸ looking at the contribution made by visitors travelling by different modes to the economic health and viability of town centres across London showed that those who walk to town centres, including the CCZ are the most frequent visitors (49 per cent visit five days a week or more) followed by train or tube (31 per cent) and bus users (28 per cent), a lot less than car users (17 per cent). In addition, previous research by Living Streets¹⁰⁹ found that well planned improvements to public spaces within town and city centres and investing in better spaces for walking could boost commercial trading by up to 30 per cent.

Less congestion also benefits drivers who drive for work and drive to work. Commercial fleets are under pressure to boost productivity and according to a survey¹¹⁰ conducted in 2023, almost half (46 per cent) of UK drivers said spending less time stuck in traffic would improve their working lives. The survey shows that congestion negatively affects both the driver and the overall performance of the company. When accounting for all drivers, transport analytics company Inrix¹¹¹ estimated that the total cost of congestion to London in 2024 was £3.85 billion, averaging £942 per driver.

¹⁰⁵ [TfL \(2008\), Central London Congestion Charging Impacts Monitoring, Sixth Annual Report](#)

¹⁰⁶ [von Schneidmesser, Dirk, and Jody Betzien \(2021\), Local Business Perception vs. Mobility Behavior of Shoppers: A Survey from Berlin | Published in Findings](#)

¹⁰⁷ [CleanCities \(2021\), Why Fewer \(polluting\) Cars in Cities are Good News for Local Shops: A review of evidence: impact of low emission zones and other "Urban Vehicle Access Regulations" on retail in European cities](#)

¹⁰⁸ [Accent \(for TfL\) \(2013\), Town Centres 2013](#)

¹⁰⁹ [Living Streets \(2018\), The Pedestrian Pound: The Business Case for Better Streets and Places](#)

¹¹⁰ [FleetPoint \(2023\) Van drivers biggest concern: traffic congestion](#)

¹¹¹ [INRIX \(2024\), Global Traffic Scorecard: London most congested city in Europe; congestion costing the UK £7.7 billion](#)

6.2.3 London's Wider Economy Baseline

6.2.3.1 Annual spend by commuters and tourists in the CCZ (£bn)

Table 26 shows GLA research¹¹² which suggests the total annual spend by commuters in the CCZ in 2019 was £4.8bn and the annual spend by tourists in the CCZ in the same year was £33.2bn. The data shows that annual spending by tourists is much larger than that of commuters. With hybrid working now more common than before the coronavirus pandemic, the annual spend by commuters is expected to be lower than in 2019.

International tourists in the Central Activities Zone (CAZ)¹¹³ brought £15.7 billion to the UK's economy in 2019, more than 63 per cent of all international tourist spending in England.¹¹⁴ The high concentration of tourist attractions, shopping and leisure destinations in the CCZ contributes to the high spending figures by tourists.

Table 26: Annual spend by commuters and tourists within the CCZ (£bn)

Commuter Group	Value
London Commuters	£3.5
UK Commuters	£1.3
Total	£4.8

Tourist Group	Value
Domestic	£17.5
International	£15.7
Total	£33.2

Research by The International Institute for Industrial Environment Economics¹¹⁵ suggests that the introduction of measures to reduce car access to a city centre is unlikely to have a negative impact on tourist numbers and may even increase them. A study by Alegre & Cladera¹¹⁶ suggests that traffic congestion could be perceived as an unsatisfactory experience by tourists, with a negative effect on a possible future visit or even lead visitors to seek out alternative destinations.

6.2.3.2 Cost of traffic delay

Transport analytics company Inrix reports that London is Europe's most congested city, ahead of Paris and Dublin. Drivers in London spent 101 hours sitting in traffic in 2024, an increase of two per cent compared to 2023.¹¹⁷ Data from recent years show an increase from 97 hours in 2022 and 99 hours in 2023 and that London continues to account for approximately 50 per cent of all UK traffic

¹¹² [GLA Economics \(2020\), Lost worker vs. tourism expenditure in the Central Activities Zone \(CAZ\) during the COVID-19 Pandemic - London Datastore](#)

¹¹³ A large proportion of the CAZ is made up of the CCZ. However, it also contains areas outside of the CCZ, including Canary Wharf.

¹¹⁴ [Arup \(2021\), The economic future of the Central Activities Zone \(CAZ\)](#)

¹¹⁵ [Wylie \(2019\), "People shop, cars don't" - Reducing business opposition to car-free city centres: The case of Oslo](#)

¹¹⁶ [Alegre, Cladera \(2006\), Repeat Visitation in Mature Sun and Sand Holiday Destinations](#)

¹¹⁷ [INRIX \(2024\) Global Traffic Scorecard: London most congested city in Europe; congestion costing the UK £7.7 billion.](#)

delay. Inrix estimated that the total cost to London in 2024 was £3.85 billion, averaging £942 per driver. TfL estimated in 2023 that congestion is costing London £4.9 billion a year.¹¹⁸

6.2.3.3 Economic output of CCZ

In 2018, Gross Value Added (GVA) contribution from activity based in the CAZ reached £147 billion which is 30 per cent of London GVA and 7.8 per cent of UK GVA.¹¹⁹

6.3 Environment Baseline

6.3.1 Data sources

This section sets out the baseline conditions for the assessment of the impacts on the environment. The study area for the environment baseline presented below is the CCZ. The baseline uses the 2024 ULEZ One Year report,¹²⁰ which provides the latest available data. This includes:

- road transport NO_x emissions (tonnes/year) for 2024 by relevant vehicle types within the CCZ
- road transport PM₁₀ emissions (tonnes/year) for 2024 by relevant vehicle types within the CCZ
- road transport PM_{2.5} emissions (tonnes/year) for 2024 by relevant vehicle types within the CCZ
- road transport CO₂ emissions (tonnes/year) for 2024 by relevant vehicle types within the CCZ

This is supported by London Atmospheric Emissions Inventory (LAEI) 2019¹²¹ data which explains the contribution of road transport in the CCZ and Greater London for the relevant pollutants.

6.3.2 Air Quality Baseline

Table 27 shows the total NO_x emissions coming from road transport in the CCZ, and the split by relevant vehicle types.¹²² Baseline data shows that, in 2024, these vehicles accounted for 45 per cent of total NO_x emissions coming from road transport in the CCZ.

Table 27: NO_x emissions in the CCZ for 2024¹²³ (tonnes/year)

Vehicle type	CCZ
Cars	21
PHVs	9
Vans	46
HGVs	22
Other ¹²⁴	119

¹¹⁸ TfL (2023), Press Release: Congestion Charge marks 20 years of keeping London moving sustainably

¹¹⁹ Arup (2021), The economic future of the Central Activities Zone (CAZ)

¹²⁰ TfL (2025), London-wide Ultra Low Emission Zone – One Year Report

¹²¹ GLA (2019) London Atmospheric Emissions Inventory (LAEI) 2019

¹²² Vehicles affected by the Proposed Changes, including cars, PHVs, vans and HGVs.

¹²³ Tonnes are rounded to the nearest 1.

¹²⁴ Other vehicles, including motorcycles, coaches, TfL buses, non-TfL buses, and taxis.

Vehicle type	CCZ
Total Road Transport	216

Table 28 shows the total PM₁₀ emissions coming from road transport in the CCZ, and the split by relevant vehicle types. Baseline data shows that, in 2024, these vehicles accounted for 60 per cent of the total PM₁₀ emissions coming from road transport in the CCZ.

Table 28: PM₁₀ emissions in the CCZ for 2024¹²⁵ (tonnes/year)

Vehicle type	CCZ
Cars	3
PHVs	2
Vans	3
HGVs	2
Other ¹²⁶	7
Total Road Transport	18

Table 29 shows the total PM_{2.5} emissions coming from road transport in the CCZ, and the split by relevant vehicle types. Baseline data shows that, in 2024, these vehicles accounted for 59 per cent of the total PM_{2.5} emissions coming from road transport in the CCZ.

Table 29: PM_{2.5} emissions in the CCZ for 2024¹²⁷ (tonnes/year)

Vehicle type	CCZ
Cars	2
PHVs	1
Vans	2
HGVs	1
Other ¹²⁸	4
Total Road Transport	10

Data from the 2019 LAEI¹²⁹ shows that road transport is estimated to have contributed:

- 23.5 per cent of total NO_x emissions in the CCZ, and a 43.4 per cent across Greater London
- 10.4 per cent of total PM₁₀ emissions in the CCZ, and a 26.7 per cent across Greater London
- 11.3 per cent of total PM_{2.5} emissions in the CCZ, and a 30.9 per cent across Greater London

¹²⁵ Tonnes are rounded to the nearest 1. Includes exhaust and non-exhaust emissions.

¹²⁶ Other vehicles, including motorcycles, coaches, TfL buses, non-TfL buses, and taxis.

¹²⁷ Tonnes are rounded to the nearest 1. Includes exhaust and non-exhaust emissions.

¹²⁸ Other vehicles, including motorcycles, coaches, TfL buses, non-TfL buses, and taxis.

¹²⁹ [GLA \(2019\) London Atmospheric Emissions Inventory \(LAEI\) 2019](#)

6.3.3 Climate Change Baseline

Table 30 shows the total CO₂ emissions coming from road transport in the CCZ, and the split by relevant vehicle types. Baseline data shows that, in 2024, these vehicles accounted for 55 per cent of the total CO₂ emissions coming from road transport in the CCZ.

Table 30: CO₂ emissions in the CCZ for 2024¹³⁰ (tonnes/year)

Vehicle type	CCZ
Cars	23,000
PHVs	8,000
Vans	24,000
HGVs	18,000
Other ¹³¹	61,000
Total Road Transport	134,000

In the 2019 LAEI¹³², road transport is estimated to have contributed 15.6 per cent of total CO₂ emissions in the CCZ, and 27.3 per cent across Greater London.

6.3.4 Noise Baseline

Road traffic is the main source of noise pollution in urban areas. In Greater London, road traffic noise presents a significant source of pollution with many areas exposed to levels above 55 A-weighted decibels (dBA), which represents the WHO threshold for outdoor noise.

While there's no legal limit to road noise in the UK, vehicles noise limits apply to all vehicle types. For instance, new cars produced since 2016 have a legal noise limit of 72 decibels (dB), which is set to reduce to 68 dB in 2026. Bigger and heavier vehicles have higher sound levels.

Noise pollution coming from road transport is largely caused by internal combustion engine (ICE) vehicles. EVs significantly reduce noise pollution in urban areas creating a much quieter living and working environment.

¹³⁰ Tonnes are rounded to the nearest 1000. Includes exhaust and grid emissions. Grid emissions are subject to variability and change.

¹³¹ Includes vehicles that aren't directly impacted by changes to CCZ charges, including motorcycles, coaches, TfL buses, non-TfL buses, and taxis.

¹³² [GLA \(2019\) London Atmospheric Emissions Inventory \(LAEI\) 2019](#)

6.4 People Baseline

This section sets out the baseline for assessment of the impact of the proposed changes on people. It is based on desktop research drawing from a range of data sources for the CCZ and London. This includes a full set of baseline information for protected groups and individuals that might be impacted by the proposed changes.

6.4.1 Data Sources

Data has been gathered from a range of sources on different protected characteristic and disadvantaged groups at the relevant spatial scales.

Secondary research has also been undertaken to gather data and evidence on protected characteristic and disadvantaged groups from sources such as government publications, and publications and research by representative bodies, advocacy groups and charitable organisations.

6.4.2 General population baseline data

6.4.2.1 Population

Table 31 shows the population across the study area (London boroughs with a boundary within the CCZ, the CCZ and Greater London as a whole). The population of Greater London is circa 8.8 million and the population of the CCZ is 168,579. The City of London, which is entirely in the CCZ, makes up approximately five per cent of the resident population, with circa 8,500 residents – making it the least populated borough of London, and around 0.1 per cent of the city's population.

Table 31: Population for relevant geographic areas¹³³

Area	Population
Camden	210,136
City of London	8,584
Hackney	259,147
Islington	216,590
Lambeth	317,650
Southwark	307,640
Tower Hamlets	310,306
Westminster	204,236
CCZ	168,579
Host boroughs	1,834,289
London	8,799,736

6.4.2.2 General population travel data

The London Travel Demand Survey (LTDS) demonstrates that the most common mode of travel by residents in the CCZ is walking, followed by bus. Only 21 per cent of CCZ residents travel by car

¹³³ ONS (2021) Census: All usual residents

(as a driver or passenger) at least once per week, which is lower than the usage within the host boroughs (38 per cent) and London-wide (61 per cent).

Table 32: London residents (aged 5+) using modes at least once per week¹³⁴

	Walk	Cycle	Bus	Rail	Car	Taxi	PHV	Motorcycle
Camden	97%	13%	67%	71%	36%	4%	16%	1%
Hackney	94%	27%	70%	55%	37%	1%	17%	0%
Islington	97%	19%	76%	67%	29%	2%	10%	0%
Lambeth	96%	18%	73%	62%	45%	1%	16%	1%
Southwark	96%	20%	71%	57%	45%	2%	12%	1%
Tower Hamlets	95%	12%	60%	59%	36%	1%	9%	1%
Westminster & City of London	96%	14%	59%	58%	33%	11%	17%	1%
CCZ	95%	17%	66%	48%	21%	6%	15%	0%
Host boroughs	96%	15%	68%	61%	38%	3%	14%	1%
London	95%	12%	57%	48%	61%	2%	10%	1%

6.4.2.3 General population travel mode – CCZ destination

Table 33 shows most trips to the CCZ by London residents are undertaken by active and sustainable modes, while just four per cent are made by car (as a driver or passenger).

Table 33: London resident trips with CCZ destination, by mode¹³⁵

Mode	London resident trips with destination in CCZ
National Rail	16%
Underground/DLR	28%
Bus/tram	11%
Taxi/other	2%
Car driver	3%
Car passenger	1%
Motorcycle	0.3%
Cycle	4%
Walk	35%
Sustainable mode share	94%

6.4.2.4 General population car access

Table 34 shows that around 27 per cent of residents in the CCZ have access to a car. Across the host boroughs, car access is higher with an average of 42 per cent of host borough residents with

¹³⁴ LTDS (2-year average) 2022/23-2023/24

¹³⁵ LTDS (2-year average) 2022/23-2023/24

access to a car. However, these car access levels are notably lower than the figure London-wide, at 63 per cent.

Table 34: London residents with access to a car by relevant geographic area¹³⁶

Area	Access to one or more cars in household
Camden	42%
Hackney	38%
Islington	36%
Lambeth	46%
Southwark	48%
Tower Hamlets	42%
Westminster & City of London	41%
CCZ	27%
Host boroughs	42%
London	63%

6.4.2.5 Noise impacts on people

The WHO recommends reducing noise levels to 53 (dB) Lden¹³⁷ for road traffic. In England, studies show that in 2018, 40 per cent of all adults in England were exposed to long-term averaged road-traffic noise levels exceeding 50 dBs.¹³⁸ It was estimated that around 100,000 Disability Adjusted Life Years (DALYs) were lost in England due to road traffic noise. London, the Southeast and Northwest regions had the highest number of DALYs lost from road-traffic noise.

6.4.2.6 Air Quality impacts on people

Air pollution is a risk for all, causing mortality as well as specific diseases. The WHO estimates that the effects of ambient (outdoor) and household air pollution exposure cause about seven million premature deaths every year from increased mortality.¹³⁹ In the UK, air pollution is the largest environmental risk to public health, with an annual mortality of human-made air pollution in the UK estimated at roughly between 28,000 and 36,000 deaths every year.¹⁴⁰

6.4.2.7 Road safety impacts on people

The Mayor's Vision Zero objective is to reduce road deaths and serious injuries by 65 per cent by 2022, 70 per cent by 2030 and for all deaths and serious injuries from road collisions to be eliminated from London's streets by 2041. 2023 figures show around 3,700 people were killed or

¹³⁶ LTDS (2-year average) 2022/23-2023/24

¹³⁷ Day-Evening-Night level

¹³⁸ [UK Health Security Agency \(2023\), Noise pollution: mapping the health impacts of transportation noise in England](#)

¹³⁹ [World Health Organization \(n.d.\), Air Quality, energy and health](#)

¹⁴⁰ [Office for Improvements and Disparities \(2022\), Air pollution: applying All Our Health](#)

seriously injured on London's roads, with 95 people tragically killed.¹⁴¹ People walking, cycling and motorcycling continue to be most at risk, with almost 3,000 people killed or seriously injured on London's roads in 2023, making up 80 per cent of all people killed or seriously injured.

6.4.3 Age baseline data

6.4.3.1 Age Profile

Table 35 shows that there is a similar age distribution across the host boroughs and London-wide. However, the City of London has a lower proportion of people aged under 20, making up circa nine per cent of the population, compared to circa 21 per cent in the host boroughs and circa 24 per cent London-wide. Conversely, the proportion of people in the City of London age 50 to 84 is greater than in the host boroughs and London-wide.

In the CCZ, the age distribution is similar to the wider host boroughs and London. However, there is a marginally higher proportion of people aged 20 to 24, and similar to the City of London, the proportion of age 15 and under is lower than other areas.

Table 35: Age distribution for relevant geographic areas¹⁴²

Age	Camden	City of London	Hackney	Islington	Lambeth	Southwark	Tower Hamlets	Westminster	CCZ	Host boroughs	London
Aged 4 and under	4.8%	2.5%	6.2%	5.2%	4.8%	5.3%	6.2%	4.2%	3.6%	5.3%	6.0%
Aged 5 to 9	4.7%	1.9%	5.8%	4.6%	4.7%	5.2%	5.7%	3.9%	3.4%	5.0%	6.0%
Aged 10 to 15	5.9%	2.4%	7.1%	5.4%	5.8%	6.3%	6.7%	5.1%	4.2%	6.1%	7.2%
Aged 16 to 19	5.6%	2.1%	4.3%	4.1%	3.8%	4.3%	4.9%	4.4%	6.3%	4.4%	4.4%
Aged 20 to 24	9.6%	11.2%	7.2%	8.5%	8.4%	8.3%	10.3%	9.5%	13.2%	8.8%	6.7%
Aged 25 to 34	20.2%	25.8%	24.5%	25.9%	25.8%	23.8%	27.5%	21.6%	24.0%	24.5%	18.1%
Aged 35 to 49	21.1%	21.2%	22.3%	21.4%	21.8%	22.2%	22.5%	21.5%	19.6%	21.9%	22.7%
Aged 50 to 64	16.3%	18.8%	14.7%	15.5%	16.3%	16.3%	10.7%	17.8%	15.8%	15.2%	16.9%
Aged 65 to 74	6.5%	8.3%	4.8%	5.5%	5.0%	4.9%	3.3%	6.7%	5.7%	5.1%	6.5%
Aged 75 to 84	3.9%	4.4%	2.2%	2.8%	2.6%	2.5%	1.6%	3.9%	3.0%	2.7%	3.8%
Aged 85 and over	1.5%	1.4%	0.9%	1.1%	1.0%	1.0%	0.7%	1.5%	1.1%	1.0%	1.6%

¹⁴¹ TfL (2024), Press release: [New statistics show lowest number of people killed on London's roads outside of pandemic years](#)

¹⁴² ONS (2021) Census: Age by broad age bands

6.4.3.2 Travel Mode by Age

Table 36 shows that Londoners aged 5-16 are less likely to travel by rail than other Londoners. Londoners aged 17-24 are more likely to travel by bus than older Londoners, and less likely to travel by car. Older Londoners (aged 65+) are less likely to travel by most modes except car and bus compared to younger Londoners.

Table 36: London residents (aged 5+) using modes at least once per week, by age¹⁴³

Age	Use mode at least once a week							
	Walk	Cycle	Rail	Car	Bus	Taxi	PHV	Motorcycle
05-16	97%	12%	24%	68%	58%	1%	5%	0%
17-24	97%	10%	63%	50%	73%	1%	16%	1%
25-44	96%	15%	62%	55%	57%	2%	13%	1%
45-59	95%	13%	48%	68%	48%	2%	8%	2%
60-64	94%	9%	42%	69%	56%	2%	5%	1%
65+	85%	4%	30%	64%	54%	1%	4%	0%

6.4.3.3 Access to a car

Table 37 shows that access to a car in the household is lowest amongst Londoners aged 25-44 and 17-24 respectively.

Table 37: London's residents' access to cars¹⁴⁴

Age	Access to one or more cars in household
05-16	70.47%
17-24	57.46%
25-44	56.83%
45-59	69.10%
60-64	68.07%
65+	62.57%

6.4.3.4 Inequalities faced by people based on their age

In London poverty rates after housing costs were highest among children and young people in 2022/23, with 140,000 children aged four and under in households in poverty, a third of children aged five to 19 living in households in poverty.¹⁴⁵ In the same period, one quarter of people aged 80 to 84 were in poverty before housing costs, a higher percentage than any other age group.¹⁴⁶

¹⁴³ LTDS (2-year average) 2022/23-2023/24

¹⁴⁴ LTDS (2-year average) 2022/23-2023/24

¹⁴⁵ [Trust for London \(2024\), Poverty by Age](#)

¹⁴⁶ [Trust for London \(2024\), Poverty by Age](#)

Crime and fear of crime when travelling in London

According to TfL research from 2019,¹⁴⁷ 16 to 24 year olds were more likely to feel worried about their personal security (i.e. being safe from crime or antisocial behaviour) when travelling by public transport.

This age group were also more likely than other age groups to have experienced unwanted sexual behaviour while using public transport. The data from this research showed that 18 per cent said they had personally experienced unwanted sexual behaviour compared with 10 per cent of all Londoners.¹⁴⁸

Age and barriers to travel

There is intersectionality between older age and disability, and prevalence of disability rises with age. Around two thirds (67 per cent) of people aged 85 and over and 45 per cent of people over state pension age reported having a disability.¹⁴⁹ Therefore, older people may be more likely to experience barriers to travel when using public transport due to accessibility of the network, or less able to use active travel as their primary mode or as a stage of their travel.¹⁵⁰

Noise

The noise impact from traffic can have a detrimental impact on children's health. This can include sleep disturbance, anxiety, high blood pressure, poor mental health and school performance and cognitive impairment.¹⁵¹

Air quality

While air pollution affects everyone, there are inequalities in exposure and some populations who are disproportionately impacted, including those above 65 years of age and children.¹⁵²

NO₂ aggravates respiratory diseases – particularly asthma – and stunts the development of children's lungs.¹⁵³ PM_{2.5} has been linked to a range of perinatal health outcomes, asthma, cardiovascular disease, and reduced cognitive abilities in children.¹⁵⁴ In London in 2022/23, there were 2,705 emergency hospital admissions for asthma in children under 19 years.¹⁵⁵

¹⁴⁷ TfL (2019), [Understanding our Diverse Communities](#)

¹⁴⁸ TfL (2019), [Understanding our Diverse Communities](#)

¹⁴⁹ UK Parliament (2024), [UK disability statistics: prevalence and life experiences](#)

¹⁵⁰ TfL Roads Task Force, [Technical Note 20 – what are the main health impacts of roads in London?](#)

¹⁵¹ TfL Roads Task Force, [Technical Note 20 – what are the main health impacts of roads in London?](#)

¹⁵² Public Health England (2018) [Health matters: air pollution](#)

¹⁵³ Imperial College London (2023). [Impacts of air pollution across the life course – evidence highlight note](#)

¹⁵⁴ Imperial College London (2023). [Impacts of air pollution across the life course – evidence highlight note](#)

¹⁵⁵ NHS England and Office for National Statistics data, published in the [Public Health Outcomes Framework](#)

Long-term exposure to air pollution increases the risk of developing lung cancer, heart and lung disease (including asthma), stroke, and early death,^{156 157} and there is growing evidence linking air pollution exposure to an increased risk of developing dementia in older people.¹⁵⁸

Road safety

Our Vision Zero action plan explains that children and older people are disproportionately affected by road danger. For older people, the physical impacts of collisions may be more challenging for older people to cope with.¹⁵⁹

6.4.4 Disability baseline data

6.4.4.1 Disability Profile

Under the Equality Act 2010, a disability is defined as a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on the ability of an individual to carry out normal daily activities. 'Substantial' is more than minor or trivial, for example, it takes much longer than it usually would to complete a daily task like getting dressed. 'Long-term' means 12 months or more, for example a breathing condition that develops as a result of a lung infection.

A progressive condition is one which has effects increasing in severity over time. People with progressive conditions are provided special provisions under Schedule 1, paragraph 8 of the Act. These provisions provide that a person with a progressive condition is to be regarded as having an impairment which has a substantial adverse effect on their ability to carry out normal day-to-day activities before it actually has that effect, and will be treated as having an impairment which has a substantial adverse effect from the moment any impairment resulting from that condition first has some adverse effect on their ability to carry out normal day-to-day activities. This is provided that in the future the adverse effect is likely to become substantial. Examples of progressive conditions to which the special provisions apply include systemic lupus erythematosus (SLE), various types of dementia, and motor neurone disease, though this list is non-exhaustive. An individual automatically meets the disability definition under the Act from the day they are diagnosed with HIV infection, cancer or multiple sclerosis.¹⁶⁰

Table 38 shows that disability rates are similar across all areas.

Table 38: Proportion of population with disability by relevant geographic area¹⁶¹

	Disabled under the Equality Act	Not disabled under the Equality Act
Camden	15.2%	84.8%
City of London	10.7%	89.3%
Hackney	14.3%	85.7%

¹⁵⁶ [The Royal College of Physicians \(2016\). Every breath we take: The lifelong impact of air pollution.](#)

¹⁵⁷ [Department of Health and Social Care \(2022\), Chief Medical Officer's Annual Report 2022: Air pollution](#)

¹⁵⁸ [Committee on the Medical Effects of Air Pollutants \(2022\), Cognitive decline, dementia and air pollution](#)

¹⁵⁹ [TfL, Vision Zero Action Plan \(2018\)](#)

¹⁶⁰ [Disability Unit \(formerly Office for Disability Issues\) \(2011\), Equality Act 2010 Guidance: Guidance on matters to be taken into account in determining questions relating to the definition of disability](#)

¹⁶¹ ONS (2021) Census: Disability

	Disabled under the Equality Act	Not disabled under the Equality Act
Islington	16.2%	83.8%
Lambeth	13.2%	86.8%
Southwark	13.7%	86.3%
Tower Hamlets	12.9%	87.1%
Westminster	13.8%	86.2%
CCZ	13.9%	86.1%
Host boroughs	14.0%	86.1%
London	13.2%	86.8%

6.4.4.2 Travel Mode by Disability

Table 39 shows that disabled Londoners are less likely to travel by all modes except PHV, which is slightly higher. This may demonstrate the important role these vehicles play providing door to door transport for disabled people who may face barriers to travel by other modes.

Travel by car (as a driver or passenger) is higher than any other mode except walking for disabled Londoners. Again, likely demonstrating the importance of this mode for travel by disabled Londoners.

Table 39: London residents (aged 5+) using modes at least once per week, by disability¹⁶²

Use mode at least once a week								
	Walk	Cycle	Rail	Car	Bus	Taxi	PHV	Motorcycle
Not disabled	96%	13%	50%	62%	58%	2%	9%	1%
Disabled	73%	2%	21%	52%	45%	2%	10%	0%

6.4.4.3 Access to a car

Table 40 shows that disabled Londoners are less likely to have access to a car in their household than people without a disability.

Table 40: London resident access to one or more cars in household, by disability¹⁶³

	Access to one or more cars in household
Not disabled	64.38%
Disabled	47.22%

6.4.4.4 Dial-a-Ride Users

London Dial-a-Ride is a free, door-to-door transport service provided by us for older and disabled Londoners who cannot always use public transport.

Dial-a-Ride can be used for local trips, such as going to the shops, visiting family or friends, attending social activities, GP or dentist and some other medical appointments where no other

¹⁶² LTDS (2-year average) 2022/23-2023/24

¹⁶³ LTDS (2-year average) 2022/23-2023/24

form of door-to door transport is available. It cannot be used for hospital appointments, local authority day centres and school transport.

To be eligible for Dial-a-Ride services, users must meet any of the following criteria:

- a Taxicard member
- in receipt of the Higher Rate Mobility Component of Disability Living Allowance
- in receipt of the Standard or Enhanced Mobility Rate of the Personal Independence Payment (PIP)
- registered blind or partially sighted
- aged 85 or over
- in receipt of a Higher Rate Attendance Allowance
- in receipt of a War Pension Mobility Supplement

Table 41 summarises the number of residents in the host boroughs registered for Dial-a-Ride and the number of trips made in the period 2 February 2025 to 1 March 2025.

Table 41: Dial-a-Ride travel data by borough (Period 12 (02/02/2025 -01/03/2025))¹⁶⁴

Borough	Total registered users	Completed Trips
Camden	608	152
City of London	7	0
Hackney	1537	1059
Islington	427	492
Lambeth	1522	622
Southwark	786	1383
Tower Hamlets	695	414
Westminster	370	279

6.4.4.5 Blue Badge Holders

Table 42 highlights the proportion of Blue Badge holders is similar within most of the host boroughs but slightly lower in the City of London, which may be due to the lower population within this area.

Table 42: Blue Badge holders by relevant borough¹⁶⁵

Area	Number of valid Blue Badges held on 31 March 2024	Badge holders as a percentage of the population
Camden	7,000	3.3%
City of London	<1,000	1.0%
Hackney	8,000	3.0%
Islington	8,000	3.7%
Lambeth	7,000	2.2%
Southwark	8,000	2.6%

¹⁶⁴ TfL Dial-a-Ride data, 2025

¹⁶⁵ Department for Transport (2024), Valid Blue Badges held and population measures: England by local authority, 2024

Area	Number of valid Blue Badges held on 31 March 2024	Badge holders as a percentage of the population
Tower Hamlets	9,000	2.6%
Westminster	6,000	2.7%

6.4.4.6 *Inequalities faced by disabled people*

In the UK, disabled people are more likely to be on lower incomes.¹⁶⁶ Additionally, in London, families that include a disabled person are more likely to be in poverty¹⁶⁷ and living costs potentially around 25 per cent higher than those of non-disabled people.¹⁶⁸

Crime and fear of crime when travelling in London

According to TfL research from 2019, disabled Londoners are more likely than non-disabled Londoners to be worried about personal security (i.e. being safe from crime or antisocial behaviour) while using public transport in London.¹⁶⁹ Disabled Londoners are also more likely than non-disabled Londoners to have experienced a specific worrying incident in the past three months (38 per cent compared with 30 per cent).¹⁷⁰

Disability and barriers to travel

According to TfL research from 2019, 61 per cent of disabled Londoners found it difficult to use the Tube and 58 per cent found it hard to use the bus. While there has been an improvement in accessibility across public transport in recent years, with 51 per cent of our rail network being step-free in 2024¹⁷¹, this is likely to still be an issue for people travelling to stations where step-free access is unavailable. Research by Transport for All found that 51 per cent of respondents faced barriers due to a lack of step-free and level-boarding on light rail (which includes London Underground and DLR), while overcrowding was an issue for 59 per cent.¹⁷²

Disabled customers in 2019 also reported issues when travelling by bus if it is unable to stop or stop in a location where customers can easily alight the bus. Buses not stopping to let customers on or off was an issue that both disabled and non-disabled Londoners report through complaints. However, the effect on disabled Londoners is more significant than for non-disabled customers and can cause anxiety and concern. Research by Transport for All found that issues with priority space/seating and overcrowding were the greatest barriers to using the bus for respondents, at 51 per cent and 49 per cent respectively.¹⁷³

¹⁶⁶ [Joseph Rowntree Foundation \(2025\), UK Poverty 2025](#)

¹⁶⁷ [Trust for London \(2024\), Poverty and Disability](#)

¹⁶⁸ [Motability \(2022\), The transport accessibility gap](#)

¹⁶⁹ [TfL \(2019\), Understanding our Diverse Communities](#)

¹⁷⁰ [TfL \(2019\), Understanding our Diverse Communities](#) – research undertaken 2017/2018

¹⁷¹ this includes Tube, DLR, London Overground, Trams and Elizabeth line services. All our buses and 95 per cent of our bus stops are wheelchair accessible.

¹⁷² [Transport for All \(2023\), Are we there yet? Barriers to transport for disabled people in 2023](#)

¹⁷³ [Transport for All \(2023\), Are we there yet? Barriers to transport for disabled people in 2023](#)

Physical accessibility was also an issue for disabled Londoners when making journeys by walking or when using mobility aids. 65 per cent of disabled Londoners said that they faced issues navigating the condition of pavements and 43 per cent cited obstacles on the pavement.¹⁷⁴ A similar statistic was found by research by Transport for All, with 77 per cent of respondents having experienced poor pavements making it the most frequently cited barrier of any mode of transport.¹⁷⁵ The barriers faced may negatively impact on access to employment opportunities and negatively impact on quality of life.¹⁷⁶

Noise

For some disabled people, ambient noise (including noise from road traffic) can have negative impacts on wellbeing and health. For some people with hearing loss, it can impact ability to hear and understand speech, with or without hearing aids. In addition, it can exacerbate the symptoms of tinnitus and hyperacusis for people with these conditions.¹⁷⁷

Some people who are neurodivergent may have a decreased tolerance to sound, and as a result may experience increased sensitivity to noise from road traffic. This can lead to increased risk of stress, anxiety and sensory overload.

Air quality

For some disabled people, poor air quality may disproportionately impact them by exacerbating existing health conditions, particularly cardiovascular and respiratory conditions leading to negative impacts on their health.¹⁷⁸

Road Safety

Our Vision Zero action plan recognises that disabled people are disproportionately affected by road danger,¹⁷⁹ in spite of data showing that disabled people are less likely to walk or cycle than people without disabilities. Research into pedestrian motor collisions has shown that disabled people may face a significantly higher risk of being killed or seriously injured in pedestrian collisions.¹⁸⁰

While data on disability is not reliably collected in police collision statistics, the National Travel Survey from 2018 reported that disabled pedestrians are four times more likely to be injured by a motor vehicle than non-disabled people.¹⁸¹

¹⁷⁴ [TfL \(2019\), Understanding our Diverse Communities](#)

¹⁷⁵ [Transport for All \(2023\), Are we there yet? Barriers to transport for disabled people in 2023](#)

¹⁷⁶ [Motability \(2022\), The transport accessibility gap](#)

¹⁷⁷ [ICBEN \(2017\), Disability rights aspects of ambient noise for people with auditory disorders](#)

¹⁷⁸ [Public Health England \(2018\) Health matters: air pollution](#)

¹⁷⁹ [TfL, Vision Zero Action Plan \(2018\)](#)

¹⁸⁰ [Buliung, Daniel, Rothman & Schwartz \(2022\), Disability and pedestrian road traffic injury: A scoping review](#)

¹⁸¹ [TfL \(2021\), Vision Zero Action Plan Progress Report](#)

6.4.5 Race baseline data

6.4.5.1 Race Profile

Table 43 shows that the City of London is the least diverse of the host boroughs and is notably less diverse than the London-wide population, though it has a significantly smaller population than other areas. Tower Hamlets is the most diverse borough and has a significantly higher proportion of residents who are Asian at circa 44 per cent. Southwark, Lambeth and Hackney have a notably higher Black population at circa 25 per cent, 24 per cent and 21 per cent respectively.

The proportion of people of Gypsy and Traveller and Roma ethnicity is similar across all areas at less than one per cent of the population.

Our data on the ethnicity of PHV drivers highlights that circa 87 per cent¹⁸² of PHV drivers are from Black, Asian and minority ethnic backgrounds.¹⁸³

Table 43: Racial identity of population by relevant geographic area¹⁸⁴

Area	Asian, Asian British or Asian Welsh	Black, Black British, Black Welsh, Caribbean or African	Mixed or Multiple ethnic groups	White	Other ethnic group
Camden	18.1%	9.0%	6.6%	59.5%	6.8%
City of London	16.8%	2.7%	5.5%	69.4%	5.6%
Hackney	10.4%	21.1%	6.7%	53.1%	8.7%
Islington	9.9%	13.3%	7.5%	62.2%	7.1%
Lambeth	7.3%	24.0%	8.1%	55.0%	5.7%
Southwark	9.9%	25.1%	7.2%	51.4%	6.3%
Tower Hamlets	44.4%	7.3%	5.0%	39.4%	3.9%
Westminster	16.8%	8.1%	6.5%	55.2%	13.5%
CCZ	18.1%	11.9%	6.6%	56.2%	7.3%
Host boroughs	17.1%	16.1%	6.8%	53.0%	7.1%
London	20.7%	13.5%	5.7%	53.8%	6.3%

¹⁸² TfL Licensing and Regulation data, 2025

¹⁸³ Figures on ethnicity exclude respondents who declined to state their ethnicity. Actual levels may vary

¹⁸⁴ ONS (2021) Census: Ethnic group

6.4.5.2 Access to a car

According to LTDS data, Black Londoners are less likely to have access to a car in their household with circa 56 per cent having access to one or more cars, while Asian Londoners are more likely than other Londoners to have access to a car, at circa 70 per cent.

Table 44: London resident access to one or more cars in household, by race¹⁸⁵

	Access to one or more cars in household
White	63.58%
Mixed, Other and Arab	61.56%
Asian	70.47%
Black	56.26%

6.4.5.3 Travel Mode by race

Table 45 shows that Black Londoners are more likely to travel by bus than other Londoners, with circa 70 per cent travelling by this mode at least once per week. Black Londoners are also less likely to travel by car, and slightly more likely to travel by PHV.

Black and Asian Londoners are more than 50 per cent less likely to cycle than White Londoners, at six per cent compared to 15 per cent of White Londoners.

Table 45: London residents (aged 5+) using modes at least once per week, by ethnicity¹⁸⁶

Ethnicity	Use mode at least once a week							
	Walk	Cycle	Rail	Car	Bus	Taxi	PHV	Motorcycle
White	95%	15%	50%	61%	53%	2%	10%	1%
Mixed, Other and Arab	96%	12%	45%	63%	59%	1%	11%	0%
Asian	95%	6%	44%	65%	55%	1%	7%	1%
Black	95%	6%	48%	55%	73%	1%	13%	1%
Refused/prefer not to say	93%	11%	48%	57%	57%	1%	9%	1%

6.4.5.4 Inequalities faced by people based on their race

In the UK, households where the head of the household is from certain minority ethnic groups are significantly more likely to be in poverty, and tend to have higher rates of very deep and persistent poverty.¹⁸⁷ According to Trust for London, poverty rates are highest amongst Londoners of Bangladeshi ethnicity (63 per cent) followed by people from 'any other Asian background' (41 per

¹⁸⁵ LTDS (2-year average) 2022/23-2023/24

¹⁸⁶ LTDS (2-year average) 2022/23-2023/24

¹⁸⁷ [Joseph Rowntree Foundation \(2025\). UK Poverty 2025](#)

cent). The groups least likely in poverty are Mixed/Multiple Ethnic (24 per cent) and White (17 per cent).¹⁸⁸

Crime and fear of crime when travelling in London

According to our previous research undertaken in 2019,¹⁸⁹ Black, Asian and minority ethnic Londoners were more likely than White Londoners to be worried about their personal security (i.e. being safe from crime or antisocial behaviour) while using public transport.

Black, Asian and minority ethnic Londoners were also more likely than White Londoners to have experienced hate crime targeted at themselves or witnessed it in the past year (27 per cent compared with 19 per cent). The proportion rose to 32 per cent among mixed ethnicity Londoners.

Noise

Black, Asian and minority ethnic Londoners are more likely to live in areas with higher levels of noise pollution from road traffic.¹⁹⁰

Air Quality

Exposure to air pollution is disproportionately higher for communities that have higher levels of deprivation and a higher proportion of people from Black, Asian and minority ethnic backgrounds, further exacerbating existing health inequalities.¹⁹¹

Road Safety

Black, Asian and minority ethnic Londoners are less likely than White Londoners to say that they feel safe from collisions when walking around London during the day. In addition, 22 per cent consider themselves very safe from collisions when walking around London during the day compared with 30 per cent of White Londoners.¹⁹²

Black, Asian and minority ethnic Londoners are more at risk of being killed or seriously injured on London's roads, with children in this group being on average 1.5 times as likely to be killed or seriously injured on the roads than non- Black, Asian and minority ethnic children, and Black people are 2.3 times more likely to be killed or seriously injured on London's roads than White people.¹⁹³

¹⁸⁸ [Trust for London \(2024\), Poverty and Ethnicity](#)

¹⁸⁹ [TfL \(2019\), Understanding our diverse communities](#)

¹⁹⁰ [TfL, Vision Zero Action Plan \(2018\)](#)

¹⁹¹ [Aether Ltd.\(2023\), Air quality exposure and inequalities study part 1 – London analysis.](#)

¹⁹² [TfL \(2019\), Understanding our diverse communities](#)

¹⁹³ [TfL \(2021\), Vision Zero Action Plan Progress Report](#)

6.4.6 Religion or Belief baseline data

6.4.6.1 Religion or Belief Profile

Table 46 shows that the religious identity of residents varies across the host boroughs, CCZ and London. The City of London has the highest proportion of people of no religion, with Christianity the religion most who have a religion identify with at circa 35 per cent.

In the CCZ, circa 35 per cent have no religion, 37 per cent are Christians and circa 13 per cent are Muslim.

Tower Hamlets has a higher proportion of Muslim residents than other areas, at circa 40 per cent of the population.

Our data on the religion of PHV drivers highlights that circa 57 per cent¹⁹⁴ of PHV drivers are Muslim.¹⁹⁵

Table 46: Religious identity of population¹⁹⁶

Area	No religion	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religion	Not answered
Camden	34.6%	31.4%	1.1%	1.9%	4.8%	16.1%	0.2%	0.9%	8.9%
City of London	43.8%	34.7%	1.1%	2.4%	2.1%	6.3%	0.1%	0.6%	8.9%
Hackney	36.3%	30.7%	0.9%	0.8%	6.7%	13.3%	0.7%	1.9%	8.7%
Islington	40.8%	34.7%	0.8%	1.0%	1.3%	11.9%	0.3%	1.4%	7.8%
Lambeth	37.5%	43.7%	0.8%	1.0%	0.4%	8.1%	0.2%	0.7%	7.6%
Southwark	36.4%	43.3%	1.0%	1.1%	0.4%	9.6%	0.2%	0.7%	7.3%
Tower Hamlets	26.6%	22.3%	1.0%	2.0%	0.4%	39.9%	0.3%	0.5%	6.9%
Westminster	25.9%	37.3%	1.3%	2.2%	2.8%	20.0%	0.3%	0.9%	9.4%
CCZ	35.3%	37.0%	1.3%	2.1%	1.4%	12.8%	0.3%	0.9%	8.9%

¹⁹⁴ TfL Licensing and Regulation data, 2025

¹⁹⁵ Figures on religion exclude respondents who declined to state their ethnicity and religion. Actual levels may vary

¹⁹⁶ ONS (2021) Census: Religion

Area	No religion	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religion	Not answered
Host boroughs	34.1%	34.9%	1.0%	1.4%	2.2%	17.2%	0.3%	1.0%	7.9%
London	27.1%	40.7%	0.9%	5.1%	1.7%	15.0%	1.6%	1.0%	7.0%

4.4.6.1 Inequalities faced by people based on their religion or belief

In recent years, there has been an increase in the number of hate crimes experienced by people of certain religions, with significant increases in antisemitic and Islamophobic hate crimes in London and nationally.¹⁹⁷ Therefore, use of a private vehicle to access religious services may be preferred by some people due to a fear of crime and harassment when travelling in London.

6.4.7 Pregnancy and Maternity

6.4.7.1 Fertility Rates

The total fertility rate, as shown in Table 47, is a calculation of the average number of children that a woman is expected to have during her lifetime. This assumes that they experience the age-specific fertility rates for the calendar year throughout their childbearing lifespan. The data demonstrates that while the total fertility rate is lower in all host boroughs than London-wide, it is lower within the City of London, which has a significantly smaller population, at 0.55.

Table 47: Fertility rates 2023¹⁹⁸

Area	Live births	General fertility rate (GFR)	Total fertility rate (TFR)
Camden	1,976	31.3	1.00
City of London	57	14.4	0.55
Hackney	3,443	46.3	1.31
Islington	2,259	34.4	1.01
Lambeth	3,272	37.1	1.09
Southwark	3,265	37.6	1.06
Tower Hamlets	4,151	40.7	1.11
Westminster	1,909	34.2	1.00
London	104,252	48.8	1.35

6.4.7.2 Inequalities faced by people based on pregnancy and maternity

Pregnancy and maternity barriers to travel

While travel during pregnancy is generally considered safe by most modes, there are some barriers pregnant women may encounter when travelling by certain modes.

¹⁹⁷ [Home Office \(October 2024\), Hate crime, England and Wales, year ending March 2024](#)

¹⁹⁸ ONS (2023) Live births in England and Wales : birth rates down to local authority areas

When using public transport during pregnancy, women may experience nausea and sickness, and issues such as heat and overcrowding may be a concern, particularly where there may be people shoving, excessive movement on the mode of travel and lack of seats. Therefore, some pregnant and maternal women may prefer to travel by private transport such as car or taxi/PHV when travelling during pregnancy.

For some maternal women with buggies and/or travelling with their child, the car may be a more convenient type of transport, presenting less of a challenge to travelling.¹⁹⁹

Air quality

Pregnant women and their unborn child can be at higher risk of the negative health impacts of poor air quality, which can have detrimental and long-lasting effects on an unborn child – some of which may only occur later in life. In addition to the potential negative impacts on foetal growth, it can also lead to low birth weights and premature birth – the latter of which posing a potential risk to both mother and child.²⁰⁰

Noise

While noise levels from road traffic are unlikely to be at levels which may damage the hearing of an unborn child, for a pregnant mother exposure to loud noise can lead to stress which may result in negative changes to the body. This stress could lead to negative impacts on a pregnant mother and her unborn child.²⁰¹

6.4.8 Sex baseline data

6.4.8.1 Sex Profile

Table 48 shows the split between men and women is similar within the study area except City of London, where there the male population is circa five per cent more than in the CCZ as a whole and six per cent higher than the London-wide average.

Our data on PHV drivers shows that circa 98 per cent are men.²⁰²

Table 48: Sex of population²⁰³

Area	Female	Male
Camden	52.7%	47.3%
City of London	45.0%	55.0%
Hackney	52.2%	47.8%
Islington	52.3%	47.7%
Lambeth	51.5%	48.5%

¹⁹⁹ TfL (2019), [Understanding our diverse communities](#)

²⁰⁰ Public Health England (2018) [Health matters: air pollution](#)

²⁰¹ [Centres for Disease Control and Prevention, About noise and reproductive health](#)

²⁰² TfL Licensing and Regulation data 2025.

²⁰³ ONS (2021) Census: Sex

Area	Female	Male
Southwark	51.6%	48.4%
Tower Hamlets	49.8%	50.2%
Westminster	51.6%	48.4%
CCZ	50.2%	49.8%
Host boroughs	51.5%	48.5%
London	51.5%	48.5%

6.4.8.2 Travel Mode by Sex

Table 49 shows that women are less likely than men to cycle in London (circa eight per cent versus 16 per cent of men), and more likely to travel by bus (circa 60 per cent versus 54 per cent of men).

Table 49: London residents (aged 5+) using modes at least once per week, by gender²⁰⁴

Gender	Use mode at least once a week							
	Walk	Cycle	Rail	Car	Bus	Taxi	PHV	Motorcycle
Male	95%	16%	50%	61%	54%	2%	9%	2%
Female	94%	8%	46%	60%	60%	1%	10%	0%

6.4.8.3 Inequalities faced by people based on their Sex

Our previous research from 2019 showed that women were more likely than men to be travelling with buggies and/or shopping, and to be travelling with children.²⁰⁵ For this reason, the car was often seen as convenient. However, the cost and stress associated with driving means that some women preferred to use public transport.

Women were also more likely to be worried about personal security (i.e. being safe from crime or antisocial behaviour) while using public transport in London, and also more likely to have experienced unwanted sexual behaviour while using public transport. However, the mean number of incidents experienced over a three-month period (at the time of the research in 2019) was the same among women and men (both 2.7 incidents on average).

²⁰⁴ LTDS (2-year average) 2022/23-2023/24

²⁰⁵ [TfL \(2019\), Understanding our Diverse Communities](#)

6.4.9 Sexual Orientation and Gender Reassignment (LGBT)

6.4.9.1 LGBT baseline data

We recognise that sexual orientation and gender identity are two separate protected characteristics under the Equality Act 2010, however data sources often merge the two under the ‘umbrella’ term ‘LGBT’ (lesbian, gay, bisexual, transgender).

The Equality Act 2010 uses the term ‘transsexual’ for individuals who have the protected characteristic of gender reassignment. We recognise that some people consider this term outdated, so we have used the term ‘trans’ to refer to a person who has the protected characteristic of gender reassignment. However, we note that some people who identify as trans may not fall within the legal definition.

A person can be at any stage in the transition process, from proposing to reassign their sex, undergoing a process of reassignment, or having completed it. This can therefore make it difficult to accurately quantify the number of people who are protected under the Equality Act due to their gender reassignment. Census data on the proportion of people identifying as trans is therefore a useful proxy for this data. Due to data limitations, information on trans identity and sexual orientation is provided at the local authority level.

Table 50 shows that the trans identity of the population is similar within all host boroughs and London-wide, at less than one per cent of the population. Southwark has a marginally higher proportion of its population whose gender identity is different from sex registered at birth.

Table 50: Trans identity of population²⁰⁶

Area	Percentage of population whose gender identity is different from sex registered at birth	Percentage of population Trans Woman	Percentage of population Trans Man	Percentage of population All other gender identities
Camden	0.34%	0.14%	0.12%	0.07%
City of London	0.11%	0.15%	0.06%	0.01%
Hackney	0.44%	0.17%	0.14%	0.11%
Islington	0.36%	0.19%	0.15%	0.09%
Lambeth	0.39%	0.19%	0.15%	0.09%
Southwark	0.63%	0.17%	0.18%	0.09%
Tower Hamlets	0.57%	0.14%	0.14%	0.06%
Westminster	0.37%	0.14%	0.13%	0.05%
London	0.46%	0.16%	0.16%	0.05%

Table 51 demonstrates that City of London, despite a smaller population, has a higher proportion of residents who are gay or lesbian compared with the other host boroughs, at circa eight per cent of

²⁰⁶ ONS (2021) Census: Gender identity

the population. However, all host boroughs have a higher proportion of gay or lesbian residents when compared with the London-wide average of circa two per cent.

The proportion of bisexual residents is similar across all host boroughs except Westminster, where it is more closely aligned with the London-wide average.

Table 51: LGB+ identity of population²⁰⁷

Area	Percentage of population gay or lesbian	Percentage of population bisexual	Percentage of population pansexual, asexual, queer and all other sexual orientations
Camden	3.7%	2.5%	0.8%
City of London	7.6%	2.3%	0.6%
Hackney	4.1%	2.8%	1.1%
Islington	4.6%	2.7%	0.9%
Lambeth	5.3%	2.3%	0.8%
Southwark	4.5%	2.6%	1.2%
Tower Hamlets	4.0%	2.5%	0.8%
Westminster	3.5%	1.5%	0.6%
London	2.2%	1.5%	0.6%

6.4.9.2 Inequalities faced by people based on their LGBT identity

Crime and fear of crime when travelling in London

Our previous research from 2019 shows that LGBT Londoners were more likely to have been subjected to sexual comments or sexual gestures when using public transport compared to heterosexual and/or cisgender Londoners and were more likely to have experienced or witnessed hate crime.²⁰⁸

Fear of intimidation and/or abuse were potential barriers to public transport use, and modifications to travel behaviour because of such fears depended on many factors, including people's personalities, previous experiences, and the degree to which they perceive themselves as visibly LGBT.

A study by London TravelWatch published in 2023 had similar findings. 68 per cent of respondents stated that a general feeling of anti-LGBTQ+ prejudice made them feel uneasy when using public transport, 66 per cent had experienced at least one form of victimisation on public transport in the preceding 12 months, and 21 per cent were subjected to hate crime when travelling in the same period.²⁰⁹

²⁰⁷ ONS (2021) Census: Sexual orientation

²⁰⁸ [TfL \(2019\), Understanding our Diverse Communities](#)

²⁰⁹ London TravelWatch (2023), Out in London: LGBTQ+ People's Safety on London's Transport Network

6.4.10 Homelessness

Homelessness can take many forms, from short term homelessness to long-term where housing is not provided, sought, or able to be provided. There are many factors which can lead to homelessness, and homelessness may lead to accommodation within a variety of places including emergency housing, temporary accommodation (including hotels and hostels), staying with family or friends, or in some circumstances rough sleeping.

Where a person has been assessed as statutory homeless, or is threatened with homelessness, their local authority has a duty to house that person or prevent them becoming homeless. However, this is not always possible or sought and can lead to rough sleeping.

Table 52 highlights the number of people who were threatened with homelessness and owed prevention duties which include any activities aimed at preventing a household threatened with homelessness within 56 days from becoming homeless. This figure also shows the number of people who are homeless and owed relief duties and require help to secure settled accommodation.

Table 52: Number of people assessed as owed a duty (July to September 2024)²¹⁰

Area	Total households assessed as owed a duty (July to September 2024)
Camden	294
City of London	6
Hackney	651
Islington	765
Lambeth	923
Southwark ²¹¹	920
Tower Hamlets	680
Westminster	836
London	17,270

Table 53 highlights the number of people seen rough sleeping in 2023 to 2024 in the host boroughs. As shown, figures are higher in Westminster than the other host boroughs. The number of people seen rough sleeping is also high in City of London considering the significantly lower population compared to the other host boroughs.

However, it should be noted that this data may not fully represent the homeless population at any given time due to the transient nature of homelessness.

Table 53: Number of people seen rough sleeping in Host boroughs 2023/2024²¹²

²¹⁰ MHCLG (2025): Statutory homelessness: detailed local authority tables (July to September 2024)

²¹¹ London Borough of Southwark had missing data this quarter but data available from April to June 2024

²¹² GLA (2025) CHAIN report, total number of people seen rough sleeping in selected fiscal year by area

Area	Number of people seen rough sleeping (CHAIN 2023/24)
Camden	903
City of London	656
Hackney	251
Islington	409
Lambeth	681
Southwark	549
Tower Hamlets	498
Westminster	2,102

6.4.10.1 Inequalities faced by people due to homelessness.

Homeless people are more likely to suffer from poor mental and physical health, more likely to have a long-term illness or disability, and more likely to be reliant on emergency health and hospital services.²¹³

6.4.11 Asylum Seekers and Refugees

Table 54 sets out the number of asylum seekers in the host boroughs in receipt of support as of 31 December 2024. It should be noted that this does not account for asylum Seekers who are awaiting approval of their application for support or are yet to be approved accommodation within a local authority through a resettlement programme.

Table 54: Number of Asylum Seekers in receipt of support, by borough²¹⁴

Area	Total	Percentage of population
Camden	1,523	0.69%
City of London	6	0.04%
Hackney	1,243	0.47%
Islington	1,770	0.80%
Lambeth	1,502	0.48%
Southwark	1,907	0.60%
Tower Hamlets	1,647	0.50%
Westminster	1,369	0.65%

²¹³ [Homeless Link \(2024\), Unhealthy State of Homelessness 2022: Findings from the Homeless Health Needs Audit](#)

²¹⁴ Home Office (2025), Immigration System Statistics: Regional and Local authority data – Immigration groups

6.4.11.1 *Inequalities faced by people due to their asylum seeker or refugee status*

Asylum seekers and refugees may face barriers to work and employment and may be at greater risk of exploitation and being employed in low paid jobs – at times below the legal minimum wage. Asylum seekers and refugees may also face barriers to accessing healthcare provided through the NHS, and face stigmatising in society.²¹⁵

6.4.12 People on Low Incomes

There is no universal threshold of what is considered to be 'low income', and the definition of 'low income' is imprecise since it is a relative concept in which household wealth depends on a number of factors, including household size and non-income related wealth. However, for the purposes of this assessment, we have taken it to be people on an income of less than £20,000 per year. While comprehensive data on individual incomes is not available, there are data sources which can be used to understand how many people may be on lower incomes, including employment, deprivation, occupation, social grades and recipients of low-income benefits.

6.4.12.1 *Employment Levels*

Table 55 shows that unemployment levels are similar across all areas.

Table 55: *Employment and unemployment levels*²¹⁶

Area	Employed	Unemployed	Economically inactive
Camden	57.6%	5.1%	37.3%
City of London	66.9%	4.1%	29.1%
Hackney	64.1%	5.5%	30.4%
Islington	62.6%	5.4%	32.0%
Lambeth	68.0%	5.3%	26.7%
Southwark	65.2%	5.6%	29.3%
Tower Hamlets	61.4%	6.0%	32.6%
Westminster	57.3%	4.8%	37.9%
CCZ	58.0%	5.4%	36.6%
Host boroughs	62.8%	5.4%	31.8%
All London	61.4%	4.8%	33.8%

6.4.12.2 *Universal Credit Support Recipients*

Universal Credit is a form of income support provided by Government for people who are on low incomes, out of work or who cannot work.

This data provides an insight into the potential number of people within each borough who may be on low incomes. However, it is not fully representative of the low-income population.

²¹⁵ [European Human Rights Commission \(2016\), England's most disadvantaged groups: Migrants, refugees and asylum seekers](#)

²¹⁶ ONS (2021) Census: Economic activity status

Table 56 highlights that the proportion of Universal Credit claimants in the CCZ is around 13 per cent, which is similar to most of the host boroughs except City of London, at five per cent (though this area has a significantly smaller population), and Tower Hamlets and Hackney, at circa 18 per cent.

Table 56: People on Universal Credit (December 2024)²¹⁷

Area	People on Universal Credit	Approximate percentage of population
Camden	25,356	12.07%
City of London	477	5.56%
Hackney	45,905	17.71%
Islington	30,770	14.21%
Lambeth	42,576	13.40%
Southwark	43,190	14.04%
Tower Hamlets	57,497	18.53%
Westminster	23,317	11.42%
CCZ	23,085	13.69%

6.4.12.3 Social Grades

Social Grade is a socio-economic classification. This is a way of grouping people by type, which is mainly based on their social and financial situation.

Social Grade has six possible classifications (A, B, C1, C2, D and E). Census data uses a combined, four-way classification:

1. AB: Higher and intermediate managerial, administrative and professional occupations
2. C1: Supervisory, clerical, and junior managerial, administrative and professional occupations
3. C2: Skilled manual occupations
4. DE: Semi-skilled and unskilled manual occupations; unemployed and lowest grade occupations

Table 57 shows that the City of London, Westminster, and Camden have a higher proportion of residents in grades AB and C1, and a lower proportion in grade C2 and DE than other areas. Tower Hamlets and Hackney have a higher proportion of residents in the lowest social grade of DE compared to other areas.

²¹⁷ DWP (2024), People on Universal Credit

Table 57: Approximated social grades²¹⁸

Area	Approximated social grade AB	Approximated social grade C1	Approximated social grade C2	Approximated social grade DE
Camden	39.3%	34.6%	8.4%	17.7%
City of London	61.0%	28.1%	4.9%	6.0%
Hackney	26.7%	33.2%	12.5%	27.6%
Islington	35.4%	33.2%	10.0%	21.5%
Lambeth	32.1%	32.9%	12.8%	22.1%
Southwark	30.1%	32.9%	13.5%	23.5%
Tower Hamlets	33.1%	30.4%	9.8%	26.8%
Westminster	41.6%	32.5%	7.3%	18.6%
CCZ	35.6%	33.5%	9.8%	21.1%

6.4.12.4 Income Deprivation

Table 58 highlights that the proportion of income deprived neighbourhoods is lower in the City of London, Camden and Westminster when compared to other host boroughs such as Tower Hamlets and Hackney.

Table 58: Income deprivation by borough²¹⁹

Area	Percentage of population who are income deprived	Percentage of neighbourhoods in 20% most income-deprived in England
Camden	14.1%	24.06%
City of London	6.5%	16.67%
Hackney	19.6%	43.06%
Islington	17.9%	37.40%
Lambeth	15.3%	28.09%
Southwark	16.2%	33.73%
Tower Hamlets	19.2%	51.39%
Westminster	13.5%	26.56%

6.4.12.5 Care Workers

Our definition of carers for the purposes of this assessment includes:

- paid carers (domiciliary and residential)
- informal carers (unpaid)
- carers in the voluntary and community sectors (paid and unpaid); and
- personal assistants (PAs)

Care workers predominantly fall under two categories: care home workers and domiciliary care workers. The former provide care within a set location, such as a care or nursing home. The latter

²¹⁸ ONS (2021) Census: Approximated social grade

²¹⁹ ONS (2021) Income deprivation at a local authority level

provide care in the community and typically visit their clients in their own home. A domiciliary care worker would visit multiple clients in their own homes over a typical shift, in order to fulfil their care needs.

Similar to domiciliary care workers, PAs provide care within a client's own home. However, rather than being employed by a care organisation, a PA would typically be employed by the person they are caring for (or by their guardian) to support the individual to live independently. This may include tasks such as organising activities and appointments, helping with travel, personal care, and household tasks. Some PAs may be employed by a senior PA, who manages multiple PAs.

Some care workers also work on a voluntary basis for charitable organisations, while others may undertake care responsibilities on an informal basis by providing care duties for a friend or family member.

Care workers are amongst the lowest paid workers in the UK. Nationally, care worker median pay was £11 (£11.31 in the London region) in December 2023 according to research by Skills for Care.²²⁰ However, in 2024, this was considered to be around roughly £12 an hour.²²¹ This reflects changes in the National Living Wage to £11.44 in April 2024.

According to the Government's National Career Service website, the average starter salary for a care worker is £19,000 a year and £25,000 for an experienced care worker.²²² Assuming a 40-hour work week, carers receiving the National Living Wage would be paid around £23,795 annually. This is similar to the entry point (Band 2) salary of a Health Care Assistant in the NHS.²²³ However, it is important to acknowledge that many care workers in London are employed on zero-hour contracts. In 2023, around 39 per cent (73,000 filled posts) of the workforce in London were recorded as being employed on zero-hour contracts. Non-residential care services had the highest proportion of workers employed on zero-hour contracts at 62 per cent.²²⁴ Therefore, for these care workers, salaries may be lower.

It is understood that the care sector faces significant workforce challenges in retaining and recruiting staff. There is also reported to be a very high staff turnover in the sector. This is likely to be due to a combination of factors, with key concerns raised around the low pay and workload pressures experienced by staff in the sector.

A further challenge faced by many working in the domiciliary care sector is that the majority are not paid for time spent travelling between jobs. According to Unison, a survey of more than 300 domiciliary care workers across England in 2023 found that 75 per cent of care staff who look after people at home are not being paid for the time it takes them to travel between appointments.²²⁵ However, a survey by Homecare Association found that 90 per cent of staff who worked for the organisations which responded use their own vehicle or public transport and expenses are paid –

²²⁰ [Skills for Care \(2023\), A summary of the adult social care sector and workforce in London 2022/23](#)

²²¹ [Nurses.co.uk \(30 July 2024\), What is the NHS minimum wage and which social care workers are paid it?](#)

²²² [National Careers Service, Care Worker](#)

²²³ [NHS Pay Scales for 2024/25](#)

²²⁴ [Skills for Care \(2023\), A summary of the adult social care sector and workforce in London 2022/23](#)

²²⁵ [Unison \(15 June 2023\), Majority of homecare staff are unpaid for travel between visits](#)

this of course comes at a cost to the organisation, many of whom have expressed concern about the rising costs of covering travel for care workers.²²⁶

According to Skills for Care, in 2022/23 the adult social care sector in the London region had an estimated 3,500 organisations with 5,800 care-providing locations. The total number of posts was 250,000 (a change of -2,600 from 2021/22). Of these posts, 226,000 were currently filled by a person, called 'filled posts' (0.0 per cent change since 2021/22) and 24,500 were vacant posts (vacancies) that employers were actively seeking to recruit somebody into (a change of -9.8 per cent since 2021/22).²²⁷ Around 79 per cent of care workers in London are female and 65 per cent are from ethnic minority groups.²²⁸

The location a domiciliary care worker may travel to is not static and can change regularly. Homecare Association estimates that around 71 per cent of domiciliary care staff in Greater London use either their own vehicle or a company car to carry out their duties.²²⁹ The distance travelled by a PA is likely to vary dependent on the responsibilities required as part of their employment, which may include travelling with or on behalf of their client, and transporting a client to locations including work, education, social activities or health facilities.

Table 59 shows the approximate number of people in London employed in certain care activities. Table 60 shows the proportion of residents of the host boroughs that provide unpaid care. The proportion of residents proving some form of unpaid care is similar across all boroughs.

Informal carers are more likely than people with no caring responsibilities to be in poverty.²³⁰

Table 59: London population employed in certain care activities²³¹

Industry	Full-time employees	Part-time employees
Social work activities without accommodation for the elderly and disabled	24,000	20,000
Residential nursing care activities	13,000	6,000
Residential care activities for learning disabilities, mental health and substance abuse	3,000	1,250
Residential care activities for the elderly and disabled	12,000	6,000

Table 60: Unpaid carers²³²

Area	Provides no unpaid care	Provides 19 hours or less	Provides 20 to 49 hours	Provides 50 or more hours

²²⁶ Homecare Association (March 2022) Fuel costs and homecare – impact on service capacity

²²⁷ Skills for Care (2023), A summary of the adult social care sector and workforce in London 2022/23

²²⁸ Skills for Care (2023), A summary of the adult social care sector and workforce in London 2022/23

²²⁹ Homecare Association (2022), High fuel costs – the ongoing impact on homecare

²³⁰ Joseph Rowntree Foundation (2025), UK Poverty 2025

²³¹ ONS (2023), Business Register and Employment Survey

²³² ONS (2021) Census: Number of hours of unpaid care provided per week, usual residents aged 5 and over

		unpaid care a week	unpaid care a week	unpaid care a week
Camden	92.1%	4.2%	1.7%	2.1%
City of London	93.7%	4.3%	1.0%	1.0%
Hackney	92.4%	3.4%	1.9%	2.3%
Islington	91.9%	3.9%	1.8%	2.4%
Lambeth	93.0%	3.6%	1.6%	1.9%
Southwark	92.8%	3.4%	1.7%	2.2%
Tower Hamlets	92.4%	3.1%	2.0%	2.5%
Westminster	92.9%	3.5%	1.7%	2.0%

6.4.12.6 Travel Mode by Income

Table 61 shows that Londoners on incomes of less than £20,000 per year are less likely to travel by car than people on higher incomes, and more likely to travel by bus. The proportion of people on low incomes who cycle and travel by rail is also lower.

Table 61: London residents (aged 5+) using modes at least once per week, by income²³³

Household income	Use mode at least once a week							
	Walk	Cycle	Rail	Car	Bus	Taxi	PHV	Motorcycle
<£20k	91%	7%	38%	48%	65%	1%	9%	0%
£20-75k	95%	11%	48%	60%	58%	1%	9%	1%
£75k+	96%	16%	54%	69%	49%	2%	10%	1%

6.4.12.7 Travel to CCZ by income

Table 62 shows that while travel into the CCZ by private transport is low for all Londoners, it is lower for Londoners on incomes of less than £20,000 (three per cent) compared to those on higher incomes (six to seven per cent).

Table 62: Mode of travel into CCZ by London residents based on income²³⁴

	Public Transport	Private Transport	Walk/Cycle
<£20k	43%	3%	54%
£20-75k	56%	6%	38%
£75k+	53%	7%	40%

²³³ LTDS (2-year average) 2022/23-2023/24

²³⁴ LTDS (2-year average) 2022/23-2023/24. Note small sample size

6.4.12.8 Access to a car

Table 63 shows that Londoners on incomes of less than £20,000 per year are much less likely to have access to a car than people on higher incomes.

Table 63: London resident access to one or more cars in household, by income²³⁵

Access to one or more cars in household	
<£20k	38.35%
£20-75k	62.57%
£75k+	77.41%
Total	63.06%

Our previous research has also shown that Londoners aged 17 and over on less than £20,000 per year are less likely to have a driving license compared to Londoners on higher incomes.²³⁶

6.4.12.9 Inequalities faced by people based on their income

Low-income barriers to travel

As demonstrated in Table 61 and Table 63, people on lower incomes in London are less likely to have access to a car in their household, and less likely to travel by car when compared to Londoners on incomes higher than £20,000. This may be due to a number of factors, including the cost of owning a vehicle, and the additional costs associated including fuel costs, insurance and tax, and costs of parking. Some may also live in accommodation where a lack of parking availability may contribute to low car ownership.

The bus is the most commonly used mode by Londoners on low incomes, followed by walking. Rail use is higher for people with higher salaries and used less by low-income groups. This may also be related to the cost of rail fares (including London Underground) being less affordable relative to the bus. In addition, people on lower incomes are less likely to cycle and our research from 2019 showed they were also less likely to know how to cycle.²³⁷ Several factors may contribute to this including cost and availability of cycling infrastructure in more deprived areas of London leading to a lower incentive to cycle.

Air Quality

In 2023 a study on air quality highlighted the differential impacts of poor air quality on London's deprived communities. This can in certain circumstances be attributed to the distribution of deprived communities and the road network.^{238,239}

²³⁵ LTDS (2-year average) 2022/23-2023/24

²³⁶ [TfL \(2019\), Understanding our Diverse Communities](#)

²³⁷ [TfL \(2019\), Understanding our Diverse Communities](#)

²³⁸ [Aether Ltd.\(2023\), Air quality exposure and inequalities study part 1 – London analysis.](#)

²³⁹ [Aether Ltd.\(2023\), Air quality exposure and inequalities study part 2 – Comparison with other cities.](#)

There have been improvements in air quality in London in recent years through ULEZ and its expansions, which has meant that communities living in areas with higher levels of deprivation have experienced greater improvements in terms of reduction in exposure to illegal levels of NO₂ pollution compared with those living in areas with the lower levels of deprivation.²⁴⁰

Noise

A high proportion of London's deprived areas are located on arterial roads with high traffic flows. This means that these deprived areas are affected by high levels of road traffic noise.²⁴¹

Road Safety

Main roads pass through some of the most deprived communities, creating environments that are not inclusive to all, with roads that are intimidating and difficult to cross. People walking in the most deprived areas of London are more than twice as likely to be injured as those in the least deprived areas.²⁴²

²⁴⁰ [TfL \(2025\), London-wide Ultra Low Emission Zone – One Year Report](#)

²⁴¹ [TfL, Vision Zero Action Plan \(2018\)](#)

²⁴² [TfL, Vision Zero Action Plan \(2018\)](#)

7 Forecast Impacts of Proposed Changes on Travel Patterns

7.1 Introduction

This section presents the analysis undertaken to understand the potential impacts of the Proposed Changes on traffic and travel in the CCZ. It includes an introduction explaining the scope of the estimations as well as key outputs from the analysis which provide a basis for the subsequent impact assessments.

The assessment has been undertaken for the package of Proposed Changes as a whole, including the different aspects of the proposal.²⁴³ As explained in Section 5, the traffic impacts of the Proposed Changes have not been assessed outside of the CCZ.

Without the Proposed Changes the CVD will end on 25 December 2025 (i.e. no discount for all electric vehicle types from 2 January 2026²⁴⁴) and the charge will stay at £15. A 'Do Nothing' scenario was defined for traffic in the CCZ, to represent this scenario without Proposed Changes (i.e. with the CVD ending by 2025 and Congestion Charge at £15).

For the estimation of this 'Do Nothing' scenario, where the CVD ends by 2025 and there is no charge level increase, we first created a second hypothetical scenario where the current situation does not change and the current CVD is extended into the future (2026 onwards). This second hypothetical was constructed using a combination of TfL's strategic models and EV uptake forecasts. We then created the 'Do Nothing' scenario, by using monitoring data from past Congestion Charge changes and data from literature to estimate how road users respond to extra costs to drive in the CCZ under the 'Do Nothing' scenario, to reflect the end of the CVD coming by the end of the year. This same evidence and process was then used to estimate the impacts of the Proposed Changes relative to the 'Do Nothing' scenario.

The traffic impact of the Proposed Changes reported here are in comparison to the level of traffic in the equivalent year of the 'Do Nothing' scenario.

The estimated impacts on traffic only include the vehicle types directly affected by the Proposed Changes²⁴⁵, namely cars²⁴⁶, vans and HGVs, as well as PHVs. The assessment does not include vehicle types that are not directly impacted by changes to CCZ charges, including motorcycles, coaches, TfL buses, non-TfL buses, and taxis.

²⁴³ Changes coming from changes to the Residents' Discount have not been considered in this assessment given expected small scale of impact.

²⁴⁴ Unless another type of discount or exemption which is not based on fuel type applies in respect of these vehicles.

²⁴⁵ Assessment does not include L6 and L7 vehicles due to data availability.

²⁴⁶ Excludes PHVs as these are estimated separately.

7.2 Key Outputs

7.2.1 Traffic impacts

The traffic impacts of the Proposed Changes compared to the 'Do Nothing' scenario in the corresponding year are presented in Table 64 below, showing the estimated change in the number of vehicles in the CCZ during charging hours of operation, on an average weekday, and the relative change²⁴⁷. As discussed in Section 5, we have not assessed the traffic impacts of our proposals outside of the CCZ.

Table 64: Impact of Proposed Changes compared to the 'Do Nothing' scenario in each year on numbers of vehicles in the CCZ during an average weekday (veh/day, rounded to the nearest 100)²⁴⁸ and the percentage difference.

	Year	2026		2030		2035	
		Veh/day	% change	Veh/day	% change	Veh/day	% change
Impact of Proposed Changes	Car	-1,400	-2.4%	-1,600	-2.5%	-1,300	-1.9%
	PHVs	-	-0.1%	-100	-0.6%	-100	-0.4%
	Vans	-800	-2.5%	-900	-2.4%	-300	-0.8%
	HGVs	-	-0.5%	-	-0.6%	-	-0.3%
	Total	-2,200	-2.0%	-2,600	-2.2%	-1,700	-1.4%

On an average weekday during the first year of implementation, the impact of the Proposed Changes across all assessed modes during charging hours (07:00-18:00), results in a two per cent reduction in vehicles, equivalent to approximately 2,200 fewer vehicles per day. The estimated traffic benefits are slightly greater in 2030, with a 2.2 per cent reduction, with the introduction of the second phase of the proposed CVD, and decrease towards 2035, reaching a 1.4 per cent reduction of vehicles (approximately 1,700 fewer vehicles per day). However, all assessment years show a reduction in vehicle numbers in the CCZ during an average weekday in charging hours.

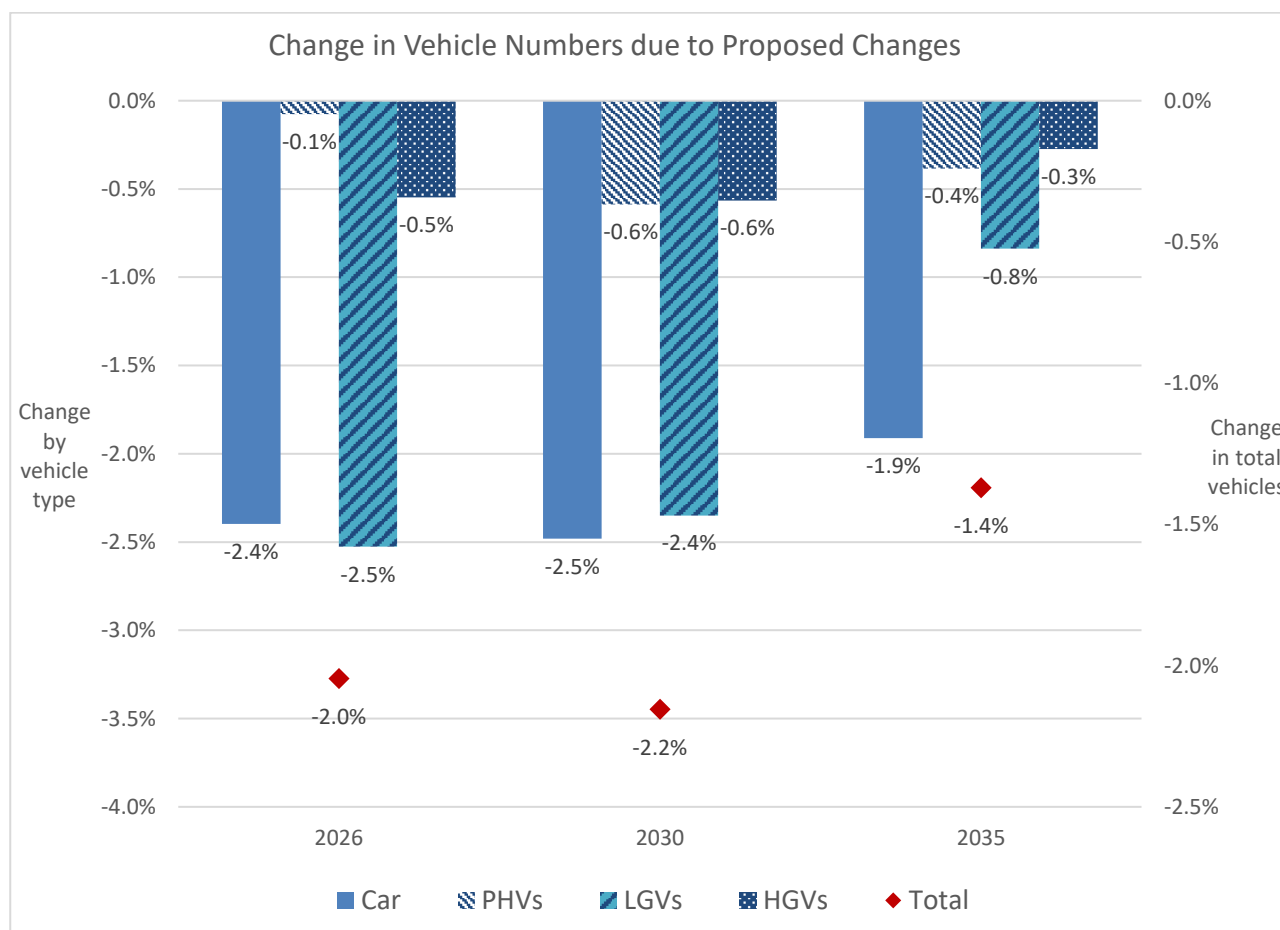
The largest reductions in vehicle numbers during charging hours are seen in vans and cars. Van traffic is reduced by 2.5 per cent during the first year, and by 0.8 per cent in 2035. Car traffic is reduced by 2.4 per cent during the first year of implementation, and by 1.9 per cent by 2035. PHVs are mainly affected from 2030 onwards, with a slight reduction of 0.6 per cent in 2030 and 0.4 per cent in 2035. HGVs show a slight reduction of 0.5 per cent in 2026 and a smaller reduction of 0.3 per cent in 2035.

²⁴⁷ The effects of inflation are not accounted for in the figures presented below, however sensitivity tests were undertaken.

²⁴⁸ Where total vehicle numbers and the percentage changes are small, the impact on vehicle numbers can appear as 0 when rounded to the nearest 100.

These impacts are also presented visually in Figure 15.

Figure 15: Impact of Proposed Changes compared to the 'Do Nothing' scenario in each assessed year in terms of percentage change in numbers of vehicles in the CCZ on an average weekday.



7.2.2 Electric vehicles

In terms of EV uptake, the Proposed Changes have a small positive impact on the take-up of EVs in the CCZ, increasing the proportion of EVs in the fleet as a whole for each year assessed. This results in a 0.9 percentage point increase in EVs, compared to the 'Do Nothing' scenario in 2026.²⁴⁹ In 2035, this grows to a 0.8 percentage point increase.

Vans are the vehicle type most responsive to the new CVD incentive, showing a higher EV uptake than other vehicle types throughout the 10 years of assessment, compared to a scenario without the Proposed Changes. However, cars and PHVs also show a higher uptake of EVs with the Proposed Changes for the first five years.

²⁴⁹ Including only vehicle types directly affected by the Proposed Changes: cars, PHVs, vans and HGVs.

Together, this shows the effectiveness of the CVD in supporting the EV transition, albeit it being only one factor to consider in people's vehicle purchasing decisions.

7.2.3 Weekend impacts

The relative impact of the Proposed Changes on traffic reduction (Table 65) and on the uptake of EVs is broadly the same during the weekend. There are some differences in terms of vehicles per day, as there are fewer total vehicles in the CCZ during weekend charging hours of operation and differences in the proportions of the assessed vehicle types – on a given day during the weekend, more of the total is made up of cars, and less of vans, compared to a weekday. During a weekday in 2026, cars make up around 52 per cent of the total, and vans around 30 per cent. At the weekend in the same year, cars make up a higher proportion of the total at 72 per cent and vans lower at eight per cent.

Table 65: Impact of Proposed Changes compared to the 'Do Nothing' scenario in each year on numbers of vehicles in the CCZ during an average weekend day (veh/day, rounded to the nearest 100)²⁵⁰ and the percentage difference.

	Year	2026		2030		2035	
		Veh/day	% change	Veh/day	% change	Veh/day	% change
Impact of Proposed Changes	Car	-1,100	-2.4%	-1,400	-2.5%	-1,100	-1.9%
	PHVs	-	-0.1%	-100	-0.6%	-	-0.4%
	Vans	-100	-2.5%	-200	-2.4%	-100	-0.8%
	HGVs	-	-0.6%	-	-0.7%	-	-0.4%
	Total	-1,300	-2.0%	-1,600	-2.2%	-1,200	-1.6%

²⁵⁰ Where total vehicle numbers and the percentage changes are small, the impact on vehicle numbers can appear as 0 when rounded to the nearest 100.

8 Economy

8.1 Introduction

This chapter assesses the impact of the Proposed Changes on the Economy. It looks at how the changes are likely to perform against objective 1: 'to maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong diverse and resilient economy providing opportunities for all'.

The chapter assesses the impact on the following three topics:

- i) Employment
- ii) Businesses
- iii) London's Wider Economy

8.2 Assessment Criteria

The assessment follows the methodology set out in Section 3.3. When considering the impact of the Proposed Changes, both direct and indirect impacts have been assessed. Direct impacts are those where the individual will have to pay an increased charge which they would not have had to pay under the current Congestion Charging scheme. The assessment looked at this impact on private vehicle drivers' access to employment and HGV, van and PHV drivers' use of their vehicles for work.

Indirect impacts are those that might impact different business sectors (e.g. retail and hospitality food services) and the size of business (e.g. SMEs²⁵¹) where there is a change as a result of the Proposed Changes (for example, affected customer travel behaviour). There may be links between direct and indirect impacts, and these have been taken into consideration to avoid double counting.

The impact on protected characteristics and disadvantaged groups, unemployment and those with low incomes and their access to jobs and training is assessed in the People Assessment in Section 10.3.3.

8.3 Assessment

8.3.1 Employment

8.3.1.1 *Impact on access to work by private vehicle*

A significant proportion of the jobs in London are located within the CCZ, which means a large number of people from across London travel into the CCZ for work. This assessment looks at the impact on these employees who drive to their place of work in the CCZ. Table 15 shows that only six per cent of CCZ residents commute to work using their car and only four per cent of people who commute into the CCZ do so by car. This means the majority of people who live within the CCZ and travel into the CCZ for work use public transport or active travel (walking or cycling). Table 14 shows that a high proportion of CCZ residents are employed in potentially higher income jobs and

²⁵¹ Small and Medium Enterprises

Table 20 shows that a high proportion of jobs in the CCZ are likely to be in higher income sectors, meaning the small group of people who will be affected by the Proposed Changes are disproportionately likely to be on higher incomes and therefore are likely to be able to adapt to the change more easily. This means that sensitivity to the change is low. The impact on those with low-income jobs is assessed in 10.3.3.3.

8.3.1.2 *Impact on employment for those that drive a vehicle for work*

This assessment looks at the impact on access to work for those who use a vehicle for work, including van, HGV drivers and PHV drivers. PHV drivers using PHVs designated as wheelchair accessible vehicles (WAV) are exempt from the Congestion Charge if they are carrying out a private hire booking and are therefore out of scope for this assessment.

Vans and HGVs

Drivers of commercial vehicles and companies that employ drivers are generally less able to switch to public transport or alternative modes given the nature and purpose of their trips. For example, section 6.2.2.3 shows that approximately 60 per cent of vans are used to carry equipment, tools and materials, some of those which may face greater barriers to switch to lighter and less polluting modes such as cargo bikes. This means they are more likely to be impacted by charge level increases than private vehicles. Table 24 shows that, according to the most recent data, 61 per cent of vans are used by a business (including sole trader, partnership or limited company). Businesses may be able to pass on this cost to customers or absorb the cost within their operations where they continue to drive in the CCZ during charging hours (some may re-time or reduce journeys), or split the cost between the two. In addition, they may benefit from potential reduced congestion which could lead to improved journey reliability to and between jobs, which might lead to increased access to work.

It is recognised that, as raised by respondents during consultation, the new CVD is lower than the 100 per cent discount provided by the current CVD. However, as explained in Section 5, under a 'Do Nothing' scenario the CVD would have ended, leading to no discount for EV van and HGV drivers, and a 100 per cent discount was not considered as a realistic alternative for assessment. Additionally, while this discount is provided in the context of a charge level increase, meaning the effect of the discount level is further reduced when compared to today, the charge level increase is essential to ensure the scheme remains effective, as explained in Section 2.3.

Large companies, for whom the daily charge would only be a small percentage of the overall cost of operations, are more likely to be able to offset the increased daily charges. However, according to the most recent data, approximately 66 per cent of vans kept by businesses are owned by sole traders or SMEs (up to 10 vans, see Table 25). These drivers may be less able to pass the increased daily charges onto their customers or absorb the increased charge, potentially impacting their ability to access jobs in the CCZ. However, although smaller operators may have a higher sensitivity to change with a greater impact than larger operators, the expected impact of the Proposed Changes on employment overall is assessed as low given the scale of the charge level increase, with most businesses expected to be able to pass the increased daily charges onto their customers or absorb the increased charge. Potential negative impacts on drivers' employment are expected to be small due to the scale of the charge level increase and the additional mitigation of

the new CVD. The new CVD will have a positive financial impact for EV van drivers compared to a 'Do Nothing' scenario (current policy is end of CVD).

PHVs

This section looks at employment for all PHV drivers. We recognise the demographics of this sector in London and the potential impact on certain protected characteristics and disadvantaged groups. This is assessed in Section 10.3.3.3.

The baseline data shows that there are 107,998 licensed PHV drivers, most of whom work with one or multiple of the four largest operators. For PHV drivers who own their own PHV, the increased charges may have a greater impact on the drivers who are a single vehicle PHV operator (sole trader) or drivers who work for one of the small PHV operators. They may be less likely to be able to spread the increased costs over multiple trips or to pass the increased costs to their customers, especially if they offer specialised services (school run, social services transport). However, TfL Licensing and Regulation data shows that most PHV drivers work with one or multiple of the four largest operators, which means that most PHV drivers are likely to be able to spread the increased costs over multiple trips or to pass the increased costs to their customer. If the PHV driver does not own their PHV, then the owner (PHV operator or fleet owner) will pay the increased charge, although they may pass the increased charges on to customers, drivers or both. This means that drivers who do not own their PHV may still be impacted through increased charges from the PHV owner.

The new CVD will have a positive financial impact on those using EVs compared to a 'Do Nothing' scenario due to the reduced cost as a result of the proposed 25 per cent discount for electric cars, compared to paying the full charge when the current CVD ends. While circa 27 per cent of PHVs are currently electric, most newly registered vehicles are EVs (71 per cent in January 2025). As such, the percentage of PHV drivers who will benefit from the new CVD is likely to increase over time, as vehicles are upgraded to meet licensing and larger operator requirements.

It is recognised that, as raised by respondents during consultation, the new CVD is lower than the 100 per cent discount provided by the current CVD. However, as explained in Section 5, under a 'Do Nothing' scenario the CVD would have ended, leading to no discount for electric PHVs, and a 100 per cent discount was not considered as a realistic alternative for assessment. Additionally, while this discount is provided in the context of a charge level increase, meaning the effect of the discount level is further reduced when compared to today, the charge level increase is essential to ensure the scheme remains effective, as explained in section 2.3.

8.3.1.3 Overall Impact

Objective: To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong diverse and resilient economy providing opportunities for all.

In conclusion, the potential effect on employment of the Proposed Changes against the objective is assessed as **neutral (0)**. For the small number of people currently driving to work within the CCZ, it is likely that these people have a low sensitivity and will be able to adapt to the Proposed Changes. For those that drive a vehicle for work, a small percentage that work alone or companies with a low number of vehicles may have a medium sensitivity to the Proposed Changes. However, given the

scale of the charge increase, it is likely that the majority will be able to absorb the increased operating costs. For those running EVs, the Proposed Changes have a positive financial impact compared to a 'Do Nothing' scenario.

8.3.2 Impacts on Businesses

8.3.2.1 *Impact on businesses due to higher costs to run the business*

SMEs have a higher potential to be impacted by the Proposed Changes as they have less capacity to absorb the increased charge level compared to larger businesses. For businesses using electric vans or vehicles, the proposed new discount for electric vehicles offers a lower level of discount than the CVD, however it will still help support drivers with electric vehicles as it is more affordable compared to current policy (end of CVD). The new CVD will have a positive financial impact for those running EVs, compared to paying the full charge when the current CVD ends. The baseline shows that more than 80 per cent of the local units in the CCZ are micro businesses (0-9 employees), with the highest proportion of units being 'Professional, scientific & technical', 'Information & communication' and 'Business administration & support services' (Table 21 and Table 22). While micro businesses represent a significant proportion of businesses in the CCZ, these sectors are less likely to be reliant on undertaking freight and servicing and/or car trips as an essential part of their operations, meaning that most of these micro businesses are less likely to be impacted by the Proposed Changes.

Economic sectors that rely more on freight use, such as 'Construction', 'Manufacturing' and 'Transport & storage', have a higher potential to be impacted as there is less potential to shift these trips to sustainable modes. This effect may be greater for micro businesses that are reliant on the freight sector or trips in the CCZ. These sectors represent a smaller proportion of businesses in the CCZ which means that the majority of micro businesses are less likely to be impacted. In addition, the proposed new discount for electric vans, HGVs, and L6 and L7 category vehicles gives these vehicles that are primarily used for freight and servicing a higher discount, recognising freight operations are essential traffic, and recognising that they need more support to electrify their fleets. This can also lead to operational savings in the longer term. The combined effect of the charge level increase and the new CVD is likely to be net financially positive for those running EVs compared to a 'Do Nothing' scenario (although costs increase from the current position with a 100 per cent CVD).

The charitable sector may use vehicles to carry out their work and so might be vulnerable to the Proposed Changes. Price increases have the potential to impact budgets, which may be limited, and this could potentially pose a risk to the range of services that are provided in the CCZ. For charities using electric vehicles, the proposed new discount for electric vehicles offers a lower level of discount than the CVD, however the proposed discount for electric vehicles will still help support this group compared to current policy (end of CVD). We recognise the important role charities play for certain groups and this is assessed in section 10.3.2.2.

In the PHV sector, the Proposed Changes will have a different impact on business depending on the ability of operators of ICE vehicles to absorb the extra cost as part of their operations. The IIA for Changes to the Congestion Charge in 2018 assessed the proposed PHV exemption removal (which went on to be implemented in 2019). It concluded that the majority of PHVs operators were not anticipated to absorb the costs of the Congestion Charge and would pass them on to drivers

and/or passengers (most likely to be spread among operator, driver, and customer, meaning there would be no or minimal expected impacts on the costs of running their business). Following the removal of the PHV exemption, we started to see this in practice with some operators charging an extra fee for trips operating in the CCZ. It is therefore expected that PHV operators would pass the increased costs of the Proposed Changes, at least in part, on to drivers or customers.

It is recognised that, as raised by respondents during consultation, the new CVD is lower than the 100 per cent discount provided by the current CVD. However, as explained in Section 5, under a 'Do Nothing' scenario the CVD would have ended, leading to no discount for electric vehicle drivers, and a 100 per cent discount was not considered as a realistic alternative for assessment. Additionally, while this discount is provided in the context of a charge level increase, meaning the effect of the discount level is further reduced when compared to today, the charge level increase is essential to ensure the scheme remains effective, as explained in Section 2.3.

8.3.2.2 Impact on businesses due to higher financial costs to customers and changes in their commuting patterns

It is not anticipated that the Proposed Changes will have a significant impact on retail, entertainment, hospitality and service sectors. Most customers use public transport and active travel modes to access these services and so would remain unaffected by the Proposed Changes. The baseline shows that most customers travel by sustainable modes into and within the CCZ with 97 per cent of the leisure trips in the CCZ made by public transport or active modes (Table 23). Some specific industry sectors such as car parking operators and car servicing and repair businesses may be more impacted by the Proposed Changes caused by the reduction of car use in the area. However, the charge level increase is considered to be relatively small compared to the overall costs associated with using these services.

For the PHV sector, the Proposed Changes may have a greater impact on small and medium PHV operators compared to larger ones given small and medium PHV operators lack the ability to spread the costs associated with the Proposed Changes across multiple customers and trips which may, therefore, lead to higher prices being charged per trip. The Economy baseline (Table 17) shows that 77 per cent of PHV operators belong to the smallest tier and are therefore small businesses, with only one or two vehicles per fleet. Although PHV operators might or might not choose to pass on their costs to the drivers or passengers, small operators with fewer vehicles, and therefore fewer trips per day, could be more sensitive to the changes and so face greater impacts. Increased costs associated with the Proposed Changes may translate into a rise in price per trip, potentially making them less attractive for customers. This may have a potential impact on consolidation of the industry, following the trend that has been happening since 2012 as set out in 6.2.1.4. However, this impact is likely to be small given the scale of the increased costs associated with the Proposed Changes.

The new CVD will likely have a positive financial impact on operators with full or majority EV fleet compared to a 'Do Nothing' scenario due to the reduced cost as a result of the proposed 25 per cent discount for electric cars, compared to paying the full charge when the current CVD ends. While circa 27 per cent of PHVs are currently electric, most newly registered vehicles are EVs (71 per cent in January 2025). As such, the percentage of operators who will benefit from the new CVD

is likely to increase over time, as vehicles are upgraded to meet licensing requirements and as operators aim to meet their own net zero targets.

It is recognised that, as raised by respondents during consultation, the new CVD is lower than the 100 per cent discount provided by the current CVD. However, as explained in Section 5, under a 'Do Nothing' scenario the CVD would have ended, leading to no discount for EV drivers, and a 100 per cent discount was not considered as a realistic alternative for assessment. Additionally, while this discount is provided in the context of a charge level increase, meaning the effect of the discount level is further reduced when compared to today, the charge level increase is essential to ensure the scheme remains effective, as explained in Section 2.3.

8.3.2.3 Impact on businesses due to changes to journey times and journey time reliability

The baseline shows that lower levels of congestion can have benefits for those driving in the CCZ (section 6.2.2.4). This can translate into time savings for those commuting to work by car, increases in productivity for those using vehicles for work (including PHV and commercial fleet drivers), as well as reducing travel time for customers accessing businesses in the CCZ. It can also improve journey reliability for the high numbers travelling by public transport (particularly bus) in the CCZ for work and leisure. The baseline shows that 97 per cent of leisure and shopping trips in the CCZ are by sustainable modes (Table 23) with 48 per cent by public transport and 49 per cent by active modes (walking and cycling). However, the Proposed Changes show a small reduction in traffic levels of approximately two per cent during the first year after the changes (and decreasing up to 2035), meaning that while there may be marginal benefits in journey reliability resultant of lower traffic levels in the CCZ, the impacts on travel time savings in the CCZ are expected to be small. While the anticipated two per cent reduction in traffic will unlikely lead to significant reductions in congestion, the Proposed Changes and their subsequent impacts on traffic help to maintain the effectiveness of the Congestion Charging scheme in achieving its primary objective of managing traffic and congestion in central London.

8.3.2.4 Impact on businesses due to impacts on employees' commuting patterns

The Proposed Changes are unlikely to impact businesses due to changed employees' commuting patterns, and it is unlikely that businesses will experience any change to staff retention or staff recruitment due to the Proposed Changes as there are many alternative modes for employees to access the workplace in the CCZ (public transport and active travel modes). The baseline shows that only four per cent of employees living in London commute to their job in the CCZ by private vehicle (Table 15). Most employees of businesses located in the CCZ already use public transport or active modes for their commute (96 per cent of workers), meaning the overwhelming majority of commuters to the CCZ are unaffected by the Proposed Changes, thus the impact on businesses due to changing employees commuting patterns is likely to be minimal.

8.3.2.5 Impact on businesses due to changes to the street environment in the CCZ

The baseline shows that businesses could benefit from less traffic and from improvements to the quality of streets and spaces, with most frequent shoppers using sustainable modes, and the potential to boost commercial activity (section 6.2.2.4). Reductions in congestion and potential shift to sustainable travel, as well as travel time savings for these modes can help making the CCZ more attractive for residents, workers and visitors, improving businesses' performance. However, Table 64 shows that the anticipated reduction in traffic vehicle numbers is expected to be

approximately two per cent, which means positive impacts on the street environment are expected to be minor.

8.3.2.6 Overall impacts

Objective: To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong diverse and resilient economy providing opportunities for all.

In conclusion, although there may be minor negative impacts on small businesses who are reliant on freight services and small operators in the PHV sector who do not currently operate, or switch to operate EVs, there is a potential minor positive impact on businesses across all vehicle types due to the benefits of reductions in traffic in the CCZ. There is also a small financial benefit to drivers and operators using EVs compared to a 'Do Nothing' scenario. The overall potential effect of the Proposed Changes to the objective is assessed as **neutral (0)**.

8.3.3 Impacts on London's Wider Economy

8.3.3.1 Impacts on London economy due to increased costs to driving in the CCZ

As set out in the baseline, the estimated total cost of congestion to London as a city is between £3.85 billion and £4.9 billion a year. As drivers in London spent 101 hours in traffic, each hour reduction could save drivers and London £9.33 per hour.²⁵² The Proposed Changes for the CCZ are estimated to reduce traffic vehicle numbers by circa two per cent which has the potential to lead to a minor reduction in traffic delays and minor improvements to journey reliability, which may translate into time savings and therefore would have a minor positive impact for London's economy.

8.3.3.2 Impact on the economy due to changes in domestic and international tourism

The baseline shows that the estimated annual spend by tourists in the CCZ is significantly larger than by commuters (Table 26). The total spend by domestic tourists is estimated to be more than international tourists.

Reductions in traffic have the potential to make the CCZ more attractive for tourists and people visiting the CCZ. However, the magnitude of changes in traffic levels due to the Proposed Changes is small and not expected to have an impact on tourism levels in the CCZ.

8.3.3.3 Impact on wider supply chains and London's economy

The cost increase of the Proposed Changes is considered to be minor in the context of the total economic output of the CAZ, of which the CCZ is a major part, which is approximately £150 billion per year (section 6.2.3.3). The scale of impact across London's economy is expected to be low compared to the economic activity of the CCZ. This means that the impact on supply chains, businesses and the employment within the CCZ and for wider London economy is also likely to be low.

²⁵² [INRIX \(2024\) Global Traffic Scorecard: London most congested city in Europe; congestion costing the UK £7.7 billion](#)

8.3.3.4 Overall impacts

Objective: To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong diverse and resilient economy providing opportunities for all.

In conclusion, given the size of the wider London economy and the wide ranges of factors that influence it, the scale of impact of the Proposed Changes is low. The overall potential effect of the Proposed Changes on the objective is therefore assessed as **neutral (0)**.

8.4 Summary of Assessments

Table 66: Summary of findings for each topic of the Economy Impact Assessment

Topic	IIA Objective	Description of impact	Impact rating	Scale	Sensitivity	Potential Mitigation and Enhancement
Employment	To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong diverse and resilient economy providing opportunities for all.	Neutral impacts overall, with potential for minor negative impacts for those using vehicles to work.	0 Neutral	Low	Medium	N/A
		Neutral impacts overall, with potential for both minor negative and positive impacts for some sectors.	0 Neutral	Low	Low	N/A
		Neutral impacts overall, with impacts likely to be negligible given the small comparable size of the charge increase with London's economic output.	0 Neutral	Low	Low	N/A

9 Environment

9.1 Introduction

This chapter assesses how the Proposed Changes are likely to perform against the following objectives for air quality, climate change and noise and vibration:

- to reduce emissions and to reduce exposure to concentrations of harmful atmospheric pollutants particularly in areas of poorest air quality
- to ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks
- to minimise noise and vibration levels and disruption to people and communities across London and to reduce exposure

The assessment has focused on changes in the following road transport emissions:

- Oxides of nitrogen (NO_x)
- Particulate matter less than 10µm in diameter (including exhaust and non-exhaust emissions) (PM₁₀)
- Particulate matter less than 2.5µm in diameter (including exhaust and non-exhaust emissions) (PM_{2.5})
- Carbon dioxide (CO₂) (including exhaust and grid emissions)²⁵³

9.2 Assessment Criteria

The assessment is based on a comparison of the forecast emissions and derived air pollutants coming from differences in vehicle kilometres and fleet compositions for a scenario with the Proposed Changes, versus a scenario without them. This has been estimated for each relevant future year.²⁵⁴ The evaluation of emissions is calculated as a percentage of annual tonnes saved between a scenario in which no changes are made and the Proposed Changes scenario.

Emissions have been estimated for the CCZ only as the Proposed Changes are expected to have a negligible impact on wider traffic numbers across London. As discussed further in Section 5, environmental impacts of the Proposed Changes outside of the CCZ have therefore not been assessed as part of this IIA. The impacts represent changes in emissions during charging hours by using an annual average of kilometres during charging hours derived from the 2024 annual baseline.²⁵⁵ Therefore, for each relevant year, the estimated emissions are representative of the total vehicle kilometres during charging hours for that year. The impact of the Proposed Changes

²⁵³ Grid emissions are variable and subject to change into the future.

²⁵⁴ Adjustments were made to LAEI 2019 fleet composition projections based on revised proportions of EV and ICE vehicles from the Proposed Changes scenario and a scenario without them. Similarly, a vehicles kilometre adjustment is applied to the 2024 baseline VKM from the proposed shift in vehicles in the CCZ zone, based on trends in the Proposed Change scenario and a scenario without them.

²⁵⁵ Annual average of kilometres during charging hours have been calculated from total annual vehicle kilometres, weighted by the annual average hourly flows at weekdays and weekends.

shows the difference in emissions for the relevant year in a scenario with Proposed Changes compared to one without them.

The analysis only considers vehicle emissions for those vehicles directly impacted by the Proposed Changes. The assessment does not include emissions from other vehicle types that are not directly impacted by changes to the Congestion Charges, including motorcycles, coaches, TfL buses, non-TfL buses, and taxis. The assessment, therefore, looks at the impact on air quality of emissions from cars,²⁵⁶ vans and HGVs, as well as PHVs.

9.3 Assessment

This section presents the results of the environmental assessment of the Proposed Changes, including an estimation of the impact on emissions within the CCZ for all the relevant future years for the three assessment topics.

9.3.1 Air Quality

9.3.1.1 Oxides of Nitrogen (NO_x)

Table 67 shows the potential percentage change in NO_x emissions in the CCZ during charging hours, as a result of the Proposed Changes compared to the 'Do Nothing' scenario in each assessed year.

Table 67: Estimated impact of Proposed Changes on NO_x emissions in the CCZ during charging hours for cars, vans, PHVs and HGVs (percentage change)

Year	2026	2030	2035
Impact of Proposed Changes (% change)	-2.7%	-2.6%	-2.4%

The impact on annual NO_x vehicle emissions resulting from the Proposed Changes during charging hours within the CCZ can be summarised as:

- annual NO_x emissions during charging hours coming from the relevant vehicle types show a decrease by 2.7 per cent in the first year of the Proposed Changes, 2.6 per cent by 2030 and 2.4 per cent by 2035
- EV adoption occurs in both scenarios but is higher with the Proposed Changes. It also occurs more rapidly in the Proposed Changes scenario resulting in higher NO_x savings in 2026 as the fleet is cleaner. The savings continue to reduce marginally out to 2035 but at a slightly lower rate as the scenario without changes also has an increase in EV adoption and both scenarios contain increasingly cleaner ICE vehicles
- both EV adoption and changes in vehicle kilometres between scenarios have an impact on emissions. A higher charge level with the Proposed Changes reduces overall vehicle kilometres, leading to additional NO_x emissions savings alongside those from fleet changes when compared to a scenario without Proposed Changes

²⁵⁶ Excludes PHVs as these are estimated separately.

9.3.1.2 Particulate matter less than 10µm in diameter (PM₁₀)

Table 68 shows the potential percentage change in PM₁₀ emissions in the CCZ during charging hours, as a result of the Proposed Changes compared to the 'Do Nothing' scenario in each assessed year.

Table 68: Estimated impact of Proposed Changes on PM₁₀ emissions in the CCZ during charging hours for cars, vans, PHVs and HGVs (percentage change)

Year	2026	2030	2035
Impact of Proposed Changes (% change)	-1.8%	-1.9%	-1.0%

The impact on annual PM₁₀ vehicle emissions resulting from the Proposed Changes,²⁵⁷ during charging hours within the CCZ can be summarised as:

- annual PM₁₀ emissions during charging hours coming from the relevant vehicle types show a decrease by 1.8 per cent in the first year of the Proposed Changes, by 1.9 per cent by 2030 and 1.0 per cent by 2035
- EV adoption occurs in both scenarios but is higher with the Proposed Changes. In particular, this improves the reduction in PM₁₀ exhaust emissions. The savings reduce out to 2035 as the scenario without changes has an increase in EV adoption
- both EV adoption and changes on vehicle kilometres between scenarios have an impact on emissions. A higher base charge with the Proposed Changes reduces overall vehicle kilometres, leading to a reduction in both exhaust and non-exhaust emissions, thus improving PM₁₀ emissions, when compared to a scenario without Proposed Changes
- reported changes in PM₁₀ result in part from anticipated changes in both exhaust and non-exhaust emissions as the composition of the fleet changes

9.3.1.3 Particulate matter less than 2.5µm in diameter (PM_{2.5})

Table 69 shows the potential percentage change in PM_{2.5} emissions in the CCZ during charging hours, as a result of the Proposed Changes compared to the 'Do Nothing' scenario in each assessed year.

Table 69: Estimated impact of Proposed Changes on PM_{2.5} emissions in the CCZ during charging hours for cars, vans, PHVs and HGVs (percentage change)

Year	2026	2030	2035
Impact of Proposed Changes (% change)	-1.8%	-1.9%	-1.0%

²⁵⁷ Includes cars, PHVs, vans and HGVs.

The impact on annual PM_{2.5} vehicle emissions resulting from the Proposed Changes,²⁵⁸ during charging hours within the CCZ can be summarised as:

- annual PM_{2.5} emissions during charging hours coming from the relevant vehicle types show a decrease by 1.8 per cent in the first year of the Proposed Changes, by 1.9 per cent by 2030 and 1.0 per cent by 2035
- EV adoption occurs in both scenarios but is higher with the Proposed Changes. In particular, this improves the reduction in PM_{2.5} exhaust emissions. The savings reduce out to 2035 as the scenario without changes has an increase in EV adoption
- both EV adoption and changes on vehicle kilometres between scenarios have an impact on emissions. A higher base charge with the Proposed Changes reduces overall vehicle kilometres, leading to a reduction in both exhaust and non-exhaust emissions, thus improving PM_{2.5} emissions, when compared to a scenario without Proposed Changes
- reported changes in PM_{2.5} result in part from anticipated changes in both exhaust and non-exhaust emissions as the composition of the fleet changes

9.3.1.4 Overall Impact

Objective: To reduce emissions and concentrations of harmful atmospheric pollutants particularly in areas of poorest air quality and to reduce exposure.

In conclusion, the Proposed Changes are estimated to result in a minor improvement in Air quality, given small changes of emissions of Car, PHV, van and HGV derived NO_x and PM in the CCZ. The scale of impact is low and the sensitivity to change is high. Therefore, the overall potential effect of the Proposed Changes on the objective is assessed as **minor positive (+1)**.

9.3.2 Climate Change

9.3.2.1 Carbon dioxide (CO₂)

Table 70 shows the potential percentage change in CO₂ emissions in the CCZ during charging hours, coming from the Proposed Changes compared to a scenario without them.

Table 70: Estimated impact of Proposed Changes on CO₂ emissions in the CCZ during charging hours for cars, vans, PHVs and HGVs (percentage change)

Year	2026	2030	2035
Impact of Proposed Changes (% change)	-2.5%	-2.6%	-2.6%

The impact on annual CO₂ emissions resulting from the Proposed Changes,²⁵⁹ during charging hours within the CCZ can be summarised as:

- annual CO₂ emissions during charging hours coming from the relevant vehicle types show a decrease by 2.5 per cent in the first year of the Proposed Changes, by 2.6 per cent by 2030 and 2.6 per cent by 2035

²⁵⁸ Includes cars, PHVs, vans and HGVs.

²⁵⁹ Includes cars, PHVs, vans and HGVs.

- savings in CO₂ remain broadly consistent across the years. This is in part caused by assumptions for energy grid improvements over time, which are subject to variability and change. In addition, the prevalence of diesel ICE vans and HGVs comparative to diesel ICE cars or PHVs, results in a consistent proportion of CO₂ savings across the assessed scenarios and years
- both EV adoption and changes to vehicle kilometres between scenarios have an impact on emissions. A higher base charge with the Proposed Changes reduces overall vehicle kilometres, leading to an increase in CO₂ emissions savings when compared to a scenario without Proposed Changes

9.3.2.2 Overall Impact

Objective: To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.

In conclusion, the Proposed Changes are estimated to result in a minor improvement on Climate Change, by contributing to CO₂ emission reductions in the CCZ. The scale of impact is low and the sensitivity to change is high. Therefore, the overall potential effect of the Proposed Changes on the objective is assessed as **minor positive (+1)**.

9.3.3 Noise

For all the assessed years, the Proposed Changes would result in a small reduction of vehicle trips within the CCZ compared to the scenario without the Proposed Changes. In addition, the proportion of EVs in the makeup of traffic is also expected to be higher due to the introduction of the Proposed Changes, with 0.9 percentage points difference between scenarios after the first year. This increase in the number of EVs has the potential to further reduce road traffic noise in the CCZ. This means that the Proposed Changes could result in lower traffic noise levels in the CCZ. However, the potential changes in noise are likely to be small, and largely imperceptible for those living and working within the CCZ.

This reflects the results of previous assessments of changes to the Congestion Charging scheme. The Central London Congestion Charging Impacts Monitoring Report,²⁶⁰ reported no evidence to support a significant reduction in noise levels in and around the CCZ as a result of the introduction of the CCZ. However, it did note a positive change in people's perception of noise and air quality levels.

9.3.3.1 Overall Impact

Objective: To minimise noise and vibration levels and disruption to people and communities across London and to reduce exposure.

In conclusion, estimated comparative reductions in traffic and higher proportion of EV vehicles in the traffic mix due to the Proposed Changes are expected to have a small positive impact on noise. However, these are not expected to be perceptible by the majority of people in the CCZ. The overall potential effect of the Proposed Changes on the objective is assessed as **neutral (0)**.

²⁶⁰ TfL (2006), [Central London Congestion Charging: Impacts Monitoring – Fourth Annual Report](#)

9.4 Summary of Assessments

Table 71: Summary of findings of the potential impacts of Proposed Changes to the Congestion Charge on London's environment

Topic	IIA Objective	Description of impact	Impact rating	Scale	Sensitivity	Potential Mitigation and Enhancement
Air quality	To reduce emissions and concentrations of harmful atmospheric pollutants particularly in areas of poorest quality and reduce exposure.	Minor reduction in emissions of NO _x , PM ₁₀ and PM _{2.5} within the CCZ during charging hours as a result of a reduction in vehicle kilometres travelled and a change in the makeup of fuel type of vehicles, reducing harmful atmospheric pollutants in areas of poor air quality, reducing exposure to them.	+1 Minor positive	Low	High	N/A
	To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.	Minor reduction in emissions of CO ₂ within the CCZ during charging hours as a result of a reduction in vehicle kilometres travelled and a change in the makeup of fuel type of vehicles, are expected to have a minor positive impact on Climate Change.	+1 Minor Positive	Low	High	N/A

Topic	IIA Objective	Description of impact	Impact rating	Scale	Sensitivity	Potential Mitigation and Enhancement
Noise	To minimise noise and vibration levels and disruption to people and communities across London and reduce exposure.	Overall neutral impact on the noise environment. While there is a potential minor positive impact expected on noise levels as a result of a reduction in vehicle kilometres travelled and a change in the makeup of fuel type of vehicles, these are not expected to be perceptible by most people.	0 Neutral	Low	High	N/A

10 People (Health and Equality)

10.1 Introduction

This section assesses the impact of the Proposed Changes on London's People. It assesses how the Proposed Changes impact the assessment topics and perform against the IIA objective as set out in Table 72.

Table 72: People assessment topics and objectives

Topic	Objective
Crime reduction and safety	To contribute to safety and security and perceptions of safety.
Accessibility, connectivity and social integration	To maximise accessibility for all in and around London and to enhance and improve connectivity for all to and from and within and around London including expanding travel horizons for those requiring safe, accessible travel options. To ensure London has socially integrated communities which are strong, resilient and free of prejudice.
Access to jobs and training	To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong diverse and resilient economy providing opportunities for all.
Health and health inequalities	To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities, reducing emissions of harmful atmospheric pollutants in areas of poorest air quality as well as minimising noise and vibration levels, as well as disruption to people and communities across London.
Protected characteristics and disadvantaged groups	To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population.

10.2 Assessment Criteria

The assessment draws on the baseline data set out in Section 6.4. However, to capture the effects on protected characteristic and disadvantaged groups within Section 10.3.5, the assessment has identified whether the impact is likely to have a disproportionate or differential effect, described as follows:

- **Disproportionate:** where there is a proportionately greater impact on members of an equality group than on other members of the general population in a particular area

- **Differential:** an impact which affects members of an equality group differently from the rest of the general population because of specific needs or a recognised vulnerability

10.3 Assessment

10.3.1 Crime reduction and safety

10.3.1.1 *Impact on crime and fear of crime*

Some people may prefer to travel within the CCZ by private modes due to an increased fear of crime and harassment when travelling on public transport. The proposed increase in charge level may make travel in the CCZ by private vehicle less affordable for some drivers and lead to a switch to public transport or active travel. A small proportion may decide to travel less frequently into the CCZ or stop travelling into the CCZ altogether.

There is the potential risk for those that switch to public transport that they may be at an increased risk of experiencing crime or harassment, and this increased risk or perceived risk may lead to heightened levels of stress and anxiety, negatively impacting mental health. The baseline data in Section 6 highlights that for certain groups, including women, Black, Asian and minority ethnic people, LGBT people and disabled people there is a greater risk of crime or fear of crime when using public transport. As a result, some people with these protected characteristics may prefer the use of private transport when travelling in the CCZ.

However, there are a number of mitigations across our public transport network to help reduce the risk of crime and harassment and ensure that where such incidents do occur, they are reported and captured. This includes help points at all stations and platforms, and CCTV coverage across our rail stations and on all our buses (including future roll out of CCTV at bus shelters following a successful trial). Our station staff and bus drivers are trained to deal with incidents of crime and harassment, and we have been undertaking an ongoing campaign to encourage users of our network to stand up to and report harassment, hate crimes, and violence against women and girls through posters and promotional material across our network. In recent years, we have also provided training for customers on how to be an ‘active bystander’²⁶¹.

Tackling transport crime and disorder is one of our main priorities, and we are committed to helping to bring real benefits to our passengers, staff and the wider community. We work closely with British Transport Police, Metropolitan Police, and our delivery partners²⁶² to tackle and mitigate the risk of crime and improve safety across our network.

We are subject to Section 17 of the Crime and Disorder Act 1998 which means we must do all we reasonably can to reduce crime and disorder on the transport system. The legislation focuses on how our delivery of core services, along with our public authorities, can make a significant difference to crime reduction in local communities.

²⁶¹ <https://tfl.gov.uk/info-for/media/press-releases/2024/october/tfl-invites-londoners-to-participate-in-active-bystander-training>

²⁶² City of London Police, GLA, London Councils, London TravelWatch, Mayor’s Office for Policing and Crime, Network Rail

The scale of the proposed increase in the charge levels would unlikely lead to a large proportion of those already driving for this purpose switching mode, and as demonstrated in Section 6.4.12.5, those on low incomes, who may be more sensitive to the proposed charge level increase, are much less likely to be travelling by car, particularly into the CCZ. While the proposed discount for EVs may help support drivers of these vehicles and make driving in the CCZ more affordable compared to a 'Do Nothing' scenario, the discount level being lower than the current 100 per cent CVD means some may still struggle to afford the charge.

The proposed change to the Residents' Discount may make some people who have a fear of crime or harassment on public transport less inclined to move into the CCZ after 1 March 2027 if they are unable to afford an EV. It may also act as a barrier to travelling in the CCZ for existing residents who do not register for the discount by 1 March 2027 and who due to safety reasons choose to switch to a private vehicle if they are unable to afford an EV or are restricted by limitations in EV charging infrastructure at or near their home. However, this is considered to be a negligible impact when factoring the existing low levels of driving and car ownership in the CCZ, and the availability of potential alternatives including taxis, PHVs, and car club vehicles. There is also a long notice period during which new and existing residents can apply for a Residents' Discount (by 1 March 2027).

Following feedback received during consultation, to further support residents who may have a reduced ability to purchase an EV who move into, are housed within, or register after the changes come into effect, we are recommending a modification to provide an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030²⁶³. We are also recommending a modification to provide a specific new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone, which if approved would help to further minimise the scale of this impact.

Some people with a fear of crime or harassment may prefer use of a PHV over public transport, or due to their lack of access to a private vehicle. While our assessment in Section 7 shows no significant change in the number of PHVs in the CCZ, it is recognised that the proposed increase in charge level may lead to an increase in the price of PHV fares in the CCZ, or a change in the number of PHVs willing to accept jobs which require travel in or to the CCZ by non-electric PHV, though PHV drivers with an EV will benefit from the proposed discount as discussed in Section 8.3.1.2. However, the impact is considered neutral, and taxis may be available as an alternative.

It is considered that the overall impact of the Proposed Changes on people with a fear of crime and harassment is neutral. To help ensure public transport is a safe alternative for people who switch modes and have a fear of crime or harassment, it is recommended that we continue to increase public awareness of how to act in the event of crime or harassment on our network through marketing campaigns and ensure that our network staff are trained to effectively deal with instances of crime and harassment. In addition to further improving safety and security measures across our network through measures such as improved lighting and enhanced CCTV coverage.

It is also recommended that we ensure existing residents of the CCZ are made aware of the proposed changes to the Residents' Discount before the proposals come into effect to ensure they

²⁶³ Refer to Section 4 for a list of the eligible benefits.

have the opportunity to register ahead of changes taking effect, and people eligible for the extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030 are made aware of the eligibility criteria if this modification is approved.

10.3.1.2 Impact on road safety

With the Proposed Changes, it is anticipated that traffic levels in the CCZ will reduce by circa two per cent, as shown in Section 7. As a result of this change, there may be marginal reductions in the number of road fatalities, near misses and injuries for both cyclists and pedestrians in the CCZ due to a lower number of vehicles on roads in the CCZ. While lower traffic levels can in some cases inadvertently lead to increased speeding, this is not anticipated to arise from the forecast reductions in traffic levels due to the Proposed Changes, and the existing lower speed limits within the CCZ.

The potential small improvements in road safety may benefit those who currently use public transport and active travel for travel in the CCZ, as well as those who choose to switch to these modes as a result of the Proposed Changes. As stated in Section 6.4, people from deprived communities, Black, Asian and minority ethnic people, disabled people, older people and children are more at risk from being in road collisions in London and may disproportionately benefit from improvements in road safety.

Overall, the reductions in traffic may lead to a minor positive impact on road safety. This impact may disproportionately benefit those who are using or switch to public and active travel, and those disproportionately impacted by road traffic collisions. To help ensure improvements in road safety are realised and enhanced, it is recommended that we continue to increase the attractiveness of cycling and walking and bus to promote use of these modes, and further increase potential for people to travel using reliable public transport, and active modes in a safe environment.

10.3.1.3 Overall impact

Objective: To contribute to safety and security and perceptions of safety

In conclusion, the overall impact of the proposals on people with a fear of crime and harassment is neutral with a minor positive impact on road safety. The overall potential effect of the Proposed Changes on the objective is assessed as **minor positive (+1)**.

10.3.2 Accessibility, connectivity and social integration

10.3.2.1 Impact on travel by active and sustainable modes

The baseline shows the majority of trips into the CCZ are made by active and sustainable modes, with a small proportion made by private transport (Table 15, Table 16, Table 23, and Table 33). In addition, CCZ residents are much less likely to travel by private transport than public transport and active travel (Table 27). As a result of the proposed increase in charge level, some people may be incentivised to switch to public transport or active travel. This may be experienced to a greater extent by people on low incomes, who may be less able to afford the proposed charge level, though low-income residents are less likely to travel by private vehicles and more likely to travel by walking or bus (Table 61).

The switch to public transport and active travel modes may have positive health benefits due to increased physical activity. While an increase in public transport usage may lead to increased overcrowding, particularly during peak hours, and may lead to busier streets and cycleways, this is likely to be a negligible change to existing crowding and street busyness levels.

Overall, the impact on travel by active and sustainable modes is minor positive. To help ensure walking, cycling and public transport infrastructure is enhanced, it is recommended that we continue to increase the attractiveness of cycling and walking and bus to promote use of these modes, to further increase potential for people to travel using reliable public transport, and active modes in a safe environment. These recommendations may help to further expand the scale to which these minor positive impacts are experienced by people travelling in the CCZ by active and sustainable modes.

10.3.2.2 Impact on charities operating in the CCZ

Charities, and people volunteering for charities, provide important services and support to people in society. Some services and support provided by charities and their volunteers may require the use of a private vehicle, including to transport a person in receipt of their services, or to transport goods which cannot be transported by public transport. Many charities rely on volunteers and operate on low margins, and there is a risk that the proposed increase in the charge level may reduce the affordability for volunteers and charity workers to enter the CCZ to provide their services.

As shown in section 6.4.10, in the City of London, which is located entirely within the CCZ, there is a high number of homeless people rough sleeping relative to its size and population. Westminster also has a significantly higher number of people rough sleeping compared to other local areas. Charities may provide essential services and support to help homeless people rough sleeping, with the CCZ providing an easily accessible central point for homeless people in the local area. Some of these services may also benefit some of the people on low incomes within the local area.

Charities providing services to disadvantaged groups, children, older people and disabled people may also struggle to stretch their budget (or personal finances for volunteers) to cover the proposed increase in charge levels. The services provided may include providing activities at community facilities and providing services in care settings. Some charitable workers and volunteers may also transport people they are supporting as part of their role.

Those travelling in an EV will benefit from the proposed discounts on the charge level, which may help to make travel into the CCZ more viable. This discount may incentivise people working in the charitable sector in the CCZ to switch to an EV. However, the discount level being lower than that provided through the CVD means some may still struggle to afford the proposed charges. For those that are unable to switch, it may lead to consolidation of trips, or an uptake in public transport for journeys into the CCZ where a private vehicle is not essential.

There are discounts, exemptions and reimbursements available already which may continue to benefit some charities and help to mitigate impacts of the proposed charge level increase. Where charities are transporting multiple people they support in a vehicle with nine or more seats, they will be entitled to a 100 per cent discount on the charge through the existing 9+ seater discount. If the vehicle is registered with the DVLA as a bus (taxation classes 'buses' and 'reduced pollution

buses') they will be automatically exempt and do not need to register with us for this discount. If a charity worker is transporting a person with a Blue Badge within the CCZ, they will be entitled to a 100 per cent discount if their vehicle is added as a nominated vehicle on the Blue Badge holder's Road User Charging account. Some charity workers may also be eligible for a 100 per cent reimbursement of the charges if the person they are transporting to a medical appointment is eligible for the NHS patient reimbursement.

The impact on charities operating in the CCZ is considered to be minor negative due to the proposed charge level increase potentially impacting already constrained budgets. However, it is considered unlikely that the additional cost will lead to a reduction in provision of services due to the proposed charge level increase relative to the existing charge level. This impact may reduce over time as charities upgrade their vehicle to electric models and come within scope of the proposed discount.

It is recognised that, as raised by respondents during consultation, the new CVD is lower than the 100 per cent discount provided by the current CVD. However, as explained in Section 5, under a 'Do Nothing' scenario the CVD would have ended, leading to no discount for charities with electric vehicles, and a 100 per cent discount was not considered as a realistic alternative for assessment. Additionally, while this discount is provided in the context of a charge level increase, meaning the effect of the discount level is further reduced when compared to today, the charge level increase is essential to ensure the scheme remains effective, as explained in section 2.3.

It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for charitable workers, including our discounts available for vehicles with 9+ seats and the 100 per cent Blue Badge discount and ensure that our NHS patient reimbursement scheme continues to be available for those who may require use of it.

10.3.2.3 Impact on community groups and access to community groups

Impact on community groups

Community groups operating in the CCZ may be providing services for residents of the local area. These groups serve a wider range of people, but may be of particular importance to children, older people, ethnic minority groups, and disabled people for whom they provide an important social role. Additionally, services may be provided free, making them of benefit to people on low incomes or living in low-income households.

These community groups may be run by volunteers and on limited budgets, which may also be required to be used on provision of the services, such as venue hire. The proposed increase in charge level may negatively impact some community groups where a non-EV is used for travel, and a switch to public transport or active travel is not viable.

The impact of the proposed increased daily charge may mean that some community group events may be at risk as a result of the increased cost of the Congestion Charge impacting on budgets. This impact is anticipated to be minor, given the proposed charge level increase relative to the existing charge level. Additionally, those travelling in an EV will benefit from the proposed discounts on the charge level, which may help to make travel into the CCZ more viable. This discount may support some people working for community groups in the CCZ with non-EVs to switch their

vehicle to an EV. For those who are able to, it may lead to a switch to public transport for certain journeys into the CCZ.

Where community groups are transporting multiple people in a vehicle with nine or more seats, they will be entitled to a 100 per cent discount on the charges through the existing 9+ seater discount. If the vehicle is registered with the DVLA as a bus (taxation classes 'buses' and 'reduced pollution buses') they will be automatically exempt and do not need to register with us for this discount.

The impact on community groups is anticipated to be minor negative.

Impact on access to community groups

As previously mentioned, community groups may play an important social role for London's people, particularly certain protected characteristic and vulnerable groups, and those on lower incomes where these groups provide free services. Some people may be reliant on use of private vehicle to access the groups, particularly those who may face barriers to use of public transport and active travel – such as disabled people and older people.

The increased financial cost may mean travel into the CCZ to access these community groups becomes more difficult, and as a result some people, particularly on lower incomes, who are reliant on private vehicle, may reduce frequency of travel to community groups or stop travel to them altogether. While people on low incomes are more likely to be travelling by active and sustainable modes than driving in CCZ, this may negatively impact on wellbeing, social interaction and have potential negative impacts on health (both physical and mental).

There are existing mitigations in place to help support people who may require use of a private vehicle for travel into the CCZ. This includes the exemption for vehicles in the disabled tax class, and the 100 per cent discount for Blue Badge holders. This may help mitigate impacts on people with mobility issues who are travelling to community groups. Some people may also be eligible for use of our Dial-a-Ride service for journeys to community groups within the CCZ, which is free for those eligible for the service.

While the proposed discount for EVs may benefit those who drive by lowering the cost of travel compared to a 'Do Nothing' scenario, it is recognised that people, particularly on lower incomes, may face barriers to ownership of these vehicles due to the higher cost and potential lack of charging infrastructure at or near their home. Furthermore, the discount level being lower than that provided through the current 100 per cent CVD means some may still struggle to afford the proposed charges. Some older people and disabled people may also face barriers to using charging infrastructure, making ownership of an EV less viable.

While the Residents' Discount may provide a mitigation for those registered before 1 March 2027, residents who register after this date (when the Proposed Changes come into effect) would only be eligible for the discount with an EV. The aforementioned barriers to owning an EV may therefore mean some may face barriers to accessing community groups by private vehicle due to the need to pay for the Congestion Charge in full if they are not eligible for any other discount or exemption.

Following feedback received during consultation, to further support residents who may have a reduced ability to purchase an EV who move into, are housed within, or register after the changes

come into effect, we are recommending a modification to provide an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030²⁶⁴. We are also recommending a modification to provide a specific new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone. These modifications if approved would help to minimise the scale of this impact.

The impact on community groups and access to community groups is minor negative. The Proposed Changes may impact on both the provision of community group services and the potential for certain people to access these services where travel by private vehicle is required. The impact is considered minor due to the low proportion of trips in the CCZ undertaken by private modes, the discounts available for people who may require travel by private vehicle for accessibility reasons and the exemption for community transport vehicles with 9+ seats. The scale of the proposed increase in the charge levels would unlikely lead to a large proportion of those already driving for this purpose switching mode, and as demonstrated in Section 6.4.12.5, those on low incomes, who may be more sensitive to the proposed charge level increase, are much less likely to be travelling by car.

Furthermore, we are recommending a 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, and the provision of grandparent rights for residents registered prior to March 2027. If approved, this modification would help to mitigate the impact on existing and future residents of the CCZ, as does the proposed modification to provide a 100 per cent discount for back to base car club EVs noted above.

It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on private vehicle use for access to community groups, including our discounts available for vehicles with 9+ seats, the 100 per cent Blue Badge discount and our Dial-a-Ride service, as well as the Residents' Discount application process and eligibility criteria if the recommended modification is approved. These recommendations may help to minimise the scale to which this minor negative impact is experienced by those who may be adversely impacted.

10.3.2.4 Impact on access to religious services during charging hours

As shown in Section 6.4.6.1, within the CCZ and City of London, there are lower proportions of religious people compared to other areas in the host boroughs such as Tower Hamlets and Westminster. However, as shown in Figure 14 there are a number of important religious centres within the CCZ. Furthermore, some religious people who are residents of the CCZ may travel to religious services outside of the CCZ due to lack of availability within their local area.

Some older people and disabled people may prefer, or be reliant on, use of a private vehicle for access to religious services during charging hours. In recent years, there has also been an increase in the number of hate crimes experienced by people of certain religions, with significant increases in antisemitic and Islamophobic hate crimes.²⁶⁵ Therefore, use of a private vehicle to

²⁶⁴ Refer to Section 4 for a list of the eligible benefits.

²⁶⁵ [Home Office \(October 2024\), Hate crime, England and Wales, year ending March 2024](#)

access religious services may be preferred by some people due to a fear of crime and harassment when travelling to these services.

Due to the proposed increase in charge level, some religious people, particularly on lower incomes, who are reliant on a private vehicle to travel to religious services during charging hours may be disproportionately negatively impacted by this change and as a result may be required to reduce travel to religious services or change where they attend these services. This may have a negative impact on social integration and social networks and lead to increased isolation. This may also disproportionately impact older religious people and religious disabled people.

Some people may need to switch to public transport or active travel where able to do so. This may lead to increased stress and anxiety of being victim of religious hate crime when travelling to services.

There are existing mitigations in place which may help support people who may require use of a private vehicle for travel to religious services. This includes the exemption for vehicles in the disabled tax class, and the 100 per cent discount for Blue Badge holders which can be applied to up to two nominated vehicles per account. Some people may also be eligible for use of our Dial-a-Ride service for journeys to religious services, which is free for those eligible for the service, or be eligible for subsidised travel by taxi or PHV through the Taxicard scheme. Additionally, the 100 per cent discount for vehicles with 9+ seats helps to mitigate impacts on religious service providers who provide transport services for people attending religious services and events they run.

While the proposed discount for EVs may benefit those who own one by lowering the cost of travel by private vehicle in the CCZ, it is recognised that people, particularly on lower incomes, may face barriers to ownership of these vehicles due to the higher cost and potential lack of charging infrastructure at or near their homes. Furthermore, the discount level being lower than that provided through the current 100 per cent CVD means some may still struggle to afford the proposed charges. Some older people and disabled people may also face barriers to using charging infrastructure, making ownership of an EV less viable.

While the Residents' Discount may provide a mitigation for those registered before 1 March 2027, those who register after this date (when the proposed changes come into effect) will only be eligible to register an EV. The aforementioned barriers to owning an EV may therefore mean they may face barriers to accessing religious groups by private vehicle due to the charge level if they are not eligible for other discounts or exemptions.

Following feedback received during consultation, to further support residents who may have a reduced ability to purchase an EV who move into, are housed within, or register after the changes come into effect, we are recommending a modification to provide an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030²⁶⁶. We are also recommending a modification to provide a specific new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone. These modifications if approved would help to minimise the scale of this impact.

²⁶⁶ Refer to Section 4 for a list of the eligible benefits.

The impact on access to religious services is minor negative for religious people who require travel by private vehicle to religious services during charging hours. While the proposed discount for EVs may help to mitigate the impact, religious people who are required to travel by private vehicle and face barriers to owning an EV such as older people or disabled people, and those on low incomes may be disproportionately negatively impacted, however, there are existing mitigations to help support people who may be required to drive due to accessibility challenges. The scale of the proposed increase in the charge levels would unlikely lead to a large proportion of those already driving for this purpose switching mode, and as demonstrated in Section 6.4.12.5, those on low incomes, who may be more sensitive to the proposed charge level increase, are much less likely to be travelling by car.

It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on private vehicle use for access to religious services, including our discounts available for vehicles with 9+ seats, the 100 per cent Blue Badge discount and our Dial-a-Ride service in addition to the Taxicard scheme and the Residents' Discount. Additionally, to help ensure public transport is a safe alternative for people who switch modes and have a fear of crime or harassment, it is recommended that we continue to increase public awareness of how to act in the event of crime or harassment on our network through marketing campaigns and ensure that our network staff are trained to effectively deal with instances of crime and harassment. In addition to further improving safety and security measures across our network through measures such as improved lighting and enhanced CCTV coverage.

10.3.2.5 Impact on access to education

The baseline shows that there is a wide range of education facilities in the CCZ. People, particularly in the CCZ, are likely to travel by active travel or public transport to their place of study, and there are a number of travel concessions we provide for school age children and those in education including Zip Oyster photocards, 18+ student Oyster photocard, and children under ten years of age travel free on our network²⁶⁷. However, it is recognised that some may be reliant on private transport (Section 6.1.2). This particularly applies to disabled people and young people travelling to Special Educational Needs (SEN) schools which may be located outside of the CCZ. This may also be the case for some disabled people attending higher and further education facilities. The proposed increase in charge level may negatively impact people who require use of private transport to travel to their place of education and are unable to switch modes, where travel is not paid for by the local authority.

While the proposed discount for EVs may help to reduce the cost for some driving to education, it is recognised that the cost of owning an EV may be a barrier, particularly for those on low incomes, and where an adapted vehicle is required. Furthermore, the discount level being lower than that provided through the CVD means some may still struggle to afford the proposed charges.

There are existing mitigations in place to help support people who may require travel to education by private vehicle. Vehicles in the disabled tax class are exempt from the Congestion Charge, and

²⁶⁷ Children under five years of age travel free, those age five to ten years travel free with a Zip Oyster Card

Blue Badge holders can nominate up to two vehicles for a 100 per cent discount. Some people may also be eligible for the Taxicard scheme, providing discounted travel by taxi or PHV.²⁶⁸

The Residents' Discount may also provide a mitigation for parents or carers travelling from or within the CCZ to transport a young person to school, who are registered for the discount prior to 1 March 2027. However, for those who register after 1 March 2027, the requirement for their vehicle to be electric to be eligible may mean they miss out on this discount if they are unable to afford an EV (if required to be adapted or accessible and not eligible for a Blue Badge), or unable to access suitable charging infrastructure. This may lead to a negative impact on access to education for residents of the CCZ where travel by private vehicle is required (though this is considered to be a very small proportion of trips), where travel is not provided or covered by their local authority as discussed below.

Following feedback received during consultation, to further support residents who may have a reduced ability to purchase an EV who move into, are housed within, or register after the changes come into effect, we are recommending a modification to provide an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030²⁶⁹. We are also recommending a modification to provide a specific new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone. The modifications if approved may help to limit the scale of the impact on residents or carers travelling from or within the CCZ to transport a young person to school.

Local authorities have specific duties to provide transport for children of compulsory school age in SEN schools who are deemed eligible for transport under the Education Act 1996. Additionally, some local authorities in line with their transport policy will provide travel to education for people aged 16 to 19. While some of these trips are fulfilled by PHV, local authorities are likely to cover the cost of PHV travel for children of compulsory school age in SEN schools, and taxis are exempt from the Congestion Charge. Given this, there is likely to be a negligible impact. PHVs designated as wheelchair accessible vehicles (WAV) are also exempt from the Congestion Charge if they are carrying out a private hire booking.

The impact on access to education is neutral due to the existing mitigations in place for people who may require use of a private vehicle for transport to education facilities. The scale of the proposed increase in the charge levels would unlikely lead to a large proportion of those already driving for this purpose where this is not due to an accessibility barrier switching mode, and as demonstrated in Section 6.4.12.5, those on low incomes, who may be more sensitive to the proposed charge level increase, are much less likely to be travelling by car.

10.3.2.6 Overall impact

Objective: To maximise accessibility for all in and around London and to enhance and improve connectivity for all to and from and within and around London including expanding travel horizons for those requiring safe, accessible travel options. To ensure London has socially integrated communities which are strong, resilient and free of prejudice.

²⁶⁸ Operated by London Councils

²⁶⁹ Refer to Section 4 for a list of the eligible benefits.

Overall, the impact of the Proposed Changes on achieving this objective is **minor negative (-1)** due to the potential impacts on community groups and charities, access to community groups and access to religious services.

10.3.3 Access to jobs and training

10.3.3.1 *Impact on carers on low incomes providing services to vulnerable groups by private vehicle, where charge is not covered by their employer*

Some people working as informal, residential or domestic carers (including PAs) travelling by public transport or active travel to provide care in the CCZ may experience improvements in journey reliability due to the minor reductions in traffic resultant of the proposed changes to the scheme. Furthermore, those in care-giving roles that are required to drive as part of their role and drive an EV will benefit from the proposed discounts, though the discount level being lower than that provided through the CVD means some may still struggle to afford the proposed charges.

However, those that do not own an EV and cannot travel by alternative modes may be negatively impacted by the proposed charge level increase. This impact may be particularly acute for those providing care on an informal basis, or those working on a paid or voluntary basis that are unable to claim back the cost of the charges from their employer. As highlighted in Section 6.4.12.5, care workers are more likely to be on lower incomes, particularly those working part time or on zero-hour contracts, and a high proportion in London drive as part of their job.

The proposed increase in the charge level may impact on the ability of some domiciliary care workers and PAs to accept jobs which require travel into the CCZ if they are not reimbursed for cost of the charge by their employer, as it may impact on their earnings. Some care providers may refuse jobs in the CCZ because the increased charge makes jobs within the CCZ unviable. Furthermore, under the proposed changes, from 1 March 2027 residents who register for the Residents' Discount will only be eligible if their vehicle is an EV. Due to the higher proportion of care workers on low incomes, some who move into the area (or currently live in the area but are not registered) may require a private vehicle for care-giving purposes but may be less able to afford an EV and therefore be negatively impacted by the Proposed Changes. As a result, there may be a disproportionate negative impact on carers.

Following feedback received during consultation, to further support residents who may have a reduced ability to purchase an EV who move into, are housed within, or register after the changes come into effect, we are recommending a modification to provide an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030²⁷⁰. We are also recommending a modification to provide a specific new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone. The modifications if approved may help to limit the scale of the impact on carers who live in the CCZ or provide services in the CCZ.

If a person with a Blue Badge is being driven to a health or social care appointment by a carer, they will be entitled to a 100 per cent discount if their vehicle is added as a nominated vehicle on the Blue Badge holder's Road User Charging account. Up to two vehicles can be eligible for the

²⁷⁰ Refer to Section 4 for a list of the eligible benefits.

discount per account, and vehicles can be added or removed online up to midnight on the day prior to travel. Some carers may also be eligible for a 100 per cent reimbursement if the person they are transporting to the medical appointment is eligible for the NHS patient reimbursement.

The impact of the Proposed Changes on access to work for carers on low incomes providing services to vulnerable groups by private vehicle is minor negative. Due to the demographics of the care sector in London, this may disproportionately impact women from Black, Asian and minority ethnic backgrounds.

It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for carers and care workers (including PAs), including our discounts available for vehicles with 9+ seats and the 100 per cent Blue Badge discount and ensure that our NHS patient reimbursement scheme continues to be available for those who may require use of it. These recommendations may help to minimise the scale to which this minor negative impact is experienced by those who may be adversely impacted.

10.3.3.2 Impact on access work or training for people who face barriers to travel by public transport or active travel

The baseline shows 96 per cent of trips to work in the CCZ are made by public transport and active transport (Table 10). However, some may live in the CCZ and travel by private vehicle to work or training opportunities outside the CCZ or live outside the CCZ and travel to work within it by private vehicle. This may be a particular issue for disabled people, as they may need to use their car because public transport is inaccessible to them and a barrier to employment.²⁷¹ Disabled people are also more likely to be on lower incomes.²⁷² Therefore, the proposed increase in charge level may introduce a barrier to work or training for those who don't qualify for another discount or exemption e.g. the Blue Badge discount.

While the proposed discount for EVs may help mitigate this impact for those who currently own or are able to purchase an EV, the cost of these vehicles in addition to the accessibility of the infrastructure (such as availability, location, and accessibility standards of charging bays) may act as a barrier. Furthermore, the discount level being lower than that provided through the current 100 per cent CVD means some may still struggle to afford the proposed charges. A similar issue may arise as a result of the Proposed Changes to the Residents' Discount. Existing residents who are not registered prior to 1 March 2027 (who may experience a change in health leading to a disability making travel by car essential) would be required to drive an EV to be eligible. However, due the barriers to use and ownership previously discussed, they may be detrimentally impacted due to cost or other barriers to travel.

Following feedback received during consultation, to further support residents who may have a reduced ability to purchase an EV who move into, are housed within, or register after the changes come into effect, we are recommending a modification to provide an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030²⁷³. We are also recommending a modification to provide a specific new 100 per cent discount

²⁷¹ [Motability \(2022\), The transport accessibility gap](#)

²⁷² [Joseph Rowntree Foundation \(2025\), UK Poverty 2025](#)

²⁷³ Refer to Section 4 for a list of the eligible benefits.

for back to base car club EVs based in bays in the Residents' Discount zone. The modifications if approved may help to limit the scale of the impact on people who live in the CCZ.

The existing 100 per cent discount for Blue Badge holders may help mitigate this impact, however it is recognised that not all disabilities are eligible for a Blue Badge, and vehicles in the disabled tax class are exempt. Alternatives that may be available include taxis and PHVs including, where relevant, Designated wheelchair accessible PHVs. Although it is considered unlikely the number of PHVs will noticeably decrease in the CCZ, especially given the increasing proportion of electric PHVs (currently 27 per cent of PHVs), there may be increases in fares as a result of the Proposed Changes as discussed in Section 8.3. This may introduce a barrier to accessibility. Conversely, some PHVs will have reduced costs compared to a 'Do Nothing' scenario (which could potentially lead to savings being passed on through fares) due to the proposed new CVD, and designated wheelchair accessible PHVs will continue to be exempt when carrying out a private hire booking.

During consultation, concern was raised around the potential impact of our proposals on NHS workers who may be reliant on use of private modes to travel to work, particularly during unsocial hours. While we recognise the impact the proposed charge level increase may have on some NHS workers; this is considered to be a very small minority of workers. Furthermore, although it is understood that some workers may work unsocial hours when public transport options may be limited, the Congestion Charge only operates between 7am and 6pm Monday to Friday and 12pm to 6pm Saturday and Sunday (plus Bank Holidays), meaning those working, or travelling to work outside these hours are not impacted.

The NHS has its own ambitions for green travel by its staff, and there is limited parking provided for staff at hospitals within the CCZ, meaning that use of active and sustainable modes to travel to work is high. The Trust Green Air Plan, published in partnership with King's College Hospital NHS Foundation Trust and Guy's and St Thomas', includes transport as a focus area and highlights the benefits to local air quality of modal shift and fleet electrification.

A staff survey undertaken by the Guy's and St Thomas' NHS Foundation Trust in 2023 found that just seven per cent of respondents travelled to work by motor vehicle, and 93 per cent travelled by active (32 per cent) and sustainable (61 per cent) modes²⁷⁴. Additionally, for those requiring travel by private modes the Trust operates a Salary Sacrifice Scheme, which as of January 2023 is only available for electric vehicles (which would benefit from the proposed new CVD), and staff are reimbursed for 'grey fleet' miles where private vehicles are used for work purposes. Residents of the CCZ who work for the NHS may be eligible for the Residents' Discount, and some staff may be eligible for the NHS Staff reimbursement scheme when undertaking certain journeys by private vehicle. As such the impact on NHS workers is considered to be neutral.

Due to the existing mitigations to support people who may require travel to work by private vehicle due to barriers to travel by public transport or active travel, the low levels of driving to work within the CCZ, and the low levels of driving by CCZ residents, the impact is considered neutral.

²⁷⁴ Guy's and St Thomas' NHS Foundation Trust (2023), Green Travel Plan 2023-27. Available at: <https://www.guysandstthomas.nhs.uk/about-us/sustainability#green-travel-plan>

10.3.3.3 *Impact on low-income workers or PHV drivers that need to travel to work in the CCZ*

As shown in Table 15, most journeys to work in the CCZ are made by public transport and active modes. However, due to the nature of the work undertaken or their hours of work (i.e. during hours of operation of the Congestion Charge), some people who need to travel to work in the CCZ may not be able to switch modes and may therefore experience increased commuting costs due to the proposed charge level increase. This impact may particularly affect people in low-income jobs. As a result, they may be less able to commute into the CCZ for work purposes, especially if they are not able to pass on the charge or have the cost reimbursed by their employer, and they may lose out on employment opportunities or leave their job due to the increased costs. While those with low incomes are less likely to own a car, as shown in Table 63, and travel by private vehicle to work in the CCZ is very low (four per cent), those that do require use of a private vehicle to travel to work, some may be less able to absorb the additional costs of the charge. Similarly, people who are unemployed may be excluded from job opportunities within the CCZ due to the Proposed Changes presenting a financial barrier to work opportunities which require private vehicle usage or travel to interviews.

The Proposed Changes may lead to a switch to public transport or active travel for some commuters or people that use their vehicle for work in the CCZ. However, for others the switch to alternative modes may not be feasible due to the nature of their work which means they will be affected by the proposed charge level increase. This may particularly affect those in low-income jobs. They may be particularly vulnerable if they are not able to pass on the charge to clients or be reimbursed by their employer. As a result, they could lose out on employment opportunities, or leave their job due to the increased costs.

The proposed discount for EVs may help to mitigate this for those with a vehicle eligible for the discount, though it is recognised that the discount level being lower than that provided through the current CVD means some may still struggle to afford the proposed charges. Additionally, for those with accessibility needs, the disabled tax class vehicle exemption and Blue Badge discount remains in place, and the Residents' Discount is available for individuals who register before 1 March 2027 after which date only new registrants with an EV will be eligible.

However, some people, especially those on lower incomes, may face barriers to owning an EV and accessing EV charging infrastructure at home. Therefore, the proposed discount for EVs may not provide a mitigation for residents applying after 1 March 2027 that are unable to purchase an EV and thus potential impact on access to work and training by non-electric private vehicle.

Following feedback received during consultation, to further support residents who may have a reduced ability to purchase an EV who move into, are housed within, or register after the changes come into effect, we are recommending a modification to provide an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030²⁷⁵. We are also recommending a modification to provide a specific new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone. These recommended modifications, if approved, would help to limit the scale of this impact.

²⁷⁵ Refer to Section 4 for a list of the eligible benefits.

Due to the proposed charge level increase relative to the existing charge level, the impact is considered to be neutral. An exceptionally small proportion of workers in the CCZ commute by private transport, and people on low incomes (including unemployed people), who may be more sensitive to the charge level increase, are much less likely to travel by car in London. Additionally, the reductions in traffic may help to improve journey reliability by private modes in the CCZ where required. Therefore, while the proposed charge level increase and proposed changes to the Residents' Discount (excluding those eligible for the grandparent rights or the extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030 should our recommended modification be approved) may negatively impact on access to work and training for some, it is considered likely that majority of those that do travel by private modes will likely either be able to absorb the proposed charge level increase or may be eligible for existing discounts.

Impact on PHV drivers

As discussed in section 8.3.1.2, the proposed changes may have a negative impact on some PHV drivers who do not drive an EV or a wheelchair-accessible vehicle. While some drivers will operate outside of charging hours and will avoid the charges (such as those working evenings), those working during charging hours may be adversely impacted.

While some operators may be able to pass on the charge to passengers through increased fares, meaning drivers working for them won't be financially impacted, they may be in competition with operators with a greater proportion of EVs within their fleet who would benefit from the Proposed Changes. However, the ability to pass the charge on will, to some extent, be determined by the type of business model in which individuals are working.

PHV drivers who mainly work in the CCZ are less likely to be impacted compared to those who do not make regular trips into the CCZ, as they may be more able to spread the cost over multiple trips, while those working predominantly outside of the CCZ may be less able to do so and therefore may lose out on bookings where a trip into the CCZ is required. The impact may be experienced differentially by women PHV drivers who, while only making up circa two per cent of PHV drivers, may be more likely to work part-time.²⁷⁶

Our data on the ethnicity of PHV drivers highlights that circa 87 per cent²⁷⁷ of PHV drivers are from a Black, Asian and minority ethnic backgrounds and 57 per cent are Muslim.^{278 279} Given that Black, Asian and minority ethnic drivers make up a high proportion of PHV drivers, it can be expected that a greater number of Black, Asian and minority ethnic PHV drivers are impacted by any increases in their professional costs if they need to drive into the CCZ during charging hours and the charge is not passed on to customers. This will particularly be an issue for those with a low income (survey data suggests that circa 29 per cent of PHV drivers who responded have a

²⁷⁶ [House of Commons Library \(2025\), Women and the UK economy](#)

²⁷⁷ TfL Licensing and Regulation data, 2025

²⁷⁸ TfL Licensing and Regulation data, 2025

²⁷⁹ Figures on ethnicity and religion excludes respondents who declined to state their ethnicity and religion. Actual levels may vary

household income of less than £21,749).²⁸⁰ However, it is likely that operators and drivers will pass on the charge. TfL Licensing and Regulation data shows that most PHV drivers work with one or multiple of the four largest operators, which means that most PHV drivers are likely to be able to spread the increased costs over multiple trips or to pass the increased costs to their customer. However, if the PHV driver does not own their PHV, then the owner (PHV operator or fleet owner) will pay the increased charge, although they may pass the increased charges on to customers, drivers or both. This means that drivers who do not own their PHV may still be impacted through increased charges from the PHV owner.

Furthermore, the proposed discount for EVs will benefit drivers with EVs compared to the 'Do Nothing' scenario due to the reduced cost. While circa 27 per cent of PHVs are currently electric, the majority of newly registered vehicles are EVs. As such, the impact will diminish over time as vehicles are upgraded to meet licensing and larger operator requirements.

It is recognised that, as raised by respondents during consultation, the new CVD is lower than the 100 per cent discount provided by the current CVD. However, as explained in Section 5, under a 'Do Nothing' scenario the CVD would have ended, leading to no discount for PHV drivers with electric vehicles, and a 100 per cent discount was not considered as a realistic alternative for assessment. Additionally, while this discount is provided in the context of a charge level increase, meaning the effect of the discount level is further reduced when compared to today, this charge level increase is essential to ensure the scheme remains effective in its primary objective of managing traffic and congestion in central London, particularly in the context of an increasing proportion of electric vehicles on London's roads, as explained in section 2.3.

Overall, the impact on access to work for PHV drivers on low incomes who do not own an EV or wheelchair-accessible PHV is considered to be minor negative. It is considered that a large proportion of operators will pass on the additional charge to customers, meaning that drivers working for them will not be negatively financially impacted, and this impact will reduce to neutral over time as vehicles are upgraded to EVs to meet licensing and larger operator requirements for cleaner vehicles. As shown in Table 19, an increasingly high proportion of new PHV registrations in London are EVs.

10.3.3.4 Overall impact

Objective: To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong diverse and resilient economy providing opportunities for all.

Overall, the effect of the Proposed Changes on achieving this objective is **minor negative (-1)** due to the potential negative impacts on care workers and PHV drivers who require travel to/for work in the CCZ that do not have an EV. This impact will reduce over time for PHV drivers as they switch to EVs to meet licencing and larger operator requirements for cleaner vehicles.

²⁸⁰ TL Licensing and Regulation data, 2025. Note: This figure excludes respondents who declined to provide their income. Actual levels may vary

10.3.4 Health and Health Inequalities

Health inequalities are avoidable, unfair and systematic differences in health between different groups of people. The differences in the care people of different groups receive and the opportunities they have had to lead healthy lives contribute to the outcomes for people's health, ultimately leading to impacts on the status of people's health.

Often, it is socio-economic factors, such as living in more deprived areas, being on lower incomes or being unemployed that can lead to differences in health status. However, other factors can also directly or indirectly influence these inequalities, including specific protected characteristics such as race, disability, or sex, or being from a socially vulnerable group such as for people experiencing homelessness.²⁸¹

10.3.4.1 *Impact on mental and physical health*

Changes in traffic levels

As highlighted in Section 77, the proposed changes are anticipated to lead to reductions in traffic levels of circa two per cent.

The reductions in traffic levels may make walking and cycling in the CCZ more pleasant, increase perceptions of safety and lead to minor reductions in road traffic collisions when travelling by active modes, as discussed in Section 10.3.1.2. Although a high proportion of trips within the CCZ are already made by walking and cycling, the increase in perceptions of a safer and more pleasant environment to undertake these journeys may lead to greater uptake of these modes, as discussed in Section 10.3.2.1.

This may lead to small scale improvements in physical and mental health due to increased physical activity and an improved environment for walking and cycling. People on low incomes may be more sensitive to the proposed price increase and therefore disproportionately benefit from these improvements in health from increased physical activity.

Overall, the improvements in health resultant of the anticipated changes in traffic levels are considered to be minor positive.

Changes in air quality

The reductions in traffic levels and increase in the proportion of vehicle traffic consisting of EVs within the CCZ is, as discussed in Section 9, anticipated to lead to minor reductions in NO_x, PM₁₀ and PM_{2.5}, and CO₂ emissions within the CCZ.

While the improvements in air quality within the CCZ will benefit all Londoners and visitors to the CCZ, older people, younger people, disabled people (particularly those with underlying health conditions exacerbated by poor air quality), people from Black, Asian and minority ethnic backgrounds, and people on low incomes living in more deprived areas of London experience the negative health impacts of poor air quality to a greater extent than other Londoners. As a result of

²⁸¹ [The King's Fund \(2022\). What are Health Inequalities?](#)

the Proposed Changes and their positive impacts on air quality on the CCZ, these groups are likely to disproportionately experience the positive impacts of improved air quality.

These improvements may lead to small improvements to health outcomes for people living within the CCZ, and those who regularly commute within it by active travel, and public or private transport.

As shown in Table 67 to Table 70, the improvements in air quality are anticipated to be experienced over a long-term, and be positively impacted by changes proposed to take effect in 2026 and 2030.

Overall, the impact health due to changes in air quality is considered to be minor positive.

Changes in noise

As a result of the anticipated reductions in traffic of circa two per cent due to the Proposed Changes, there may be marginal improvements in road traffic noise within the CCZ. Furthermore, the increase in the proportion of EVs, which are generally quieter than ICE vehicles may also lead to marginal improvements.

Decreased traffic levels will lead to decreased noise which may reduce the risk of cardiovascular disease, cognitive impairment in children, disturbed sleep, tinnitus and psychological effects from annoyance.

While changes in noise levels resulting from the Proposed Changes are anticipated to be marginal and largely imperceptible, where changes are experienced, this may positively impact people who may be more sensitive to noise. This includes children, disabled people (those with a sensitivity to noise), people from Black, Asian and minority ethnic backgrounds, and people on low incomes living in more deprived areas of London.

Due to the limited scale of changes in noise anticipated, the impact on health resultant of changes to noise levels is considered to be neutral.

10.3.4.2 Impact on access to health and social care

Access to health and social care facilities

As shown in Section 6.1.2, the CCZ contains a number of different health and social care facilities which people from across London may require access to. Additionally, some people living within the CCZ may require access to health and social care facilities which are located outside the CCZ. For some people, particularly those who may have compromised immune systems, are too ill to travel by public transport, or face barriers to public transport use, there may be a greater requirement to travel to healthcare facilities by private vehicle. Some people may require regular treatment or interventions and are therefore required to make frequent trips to/from the CCZ to attend appointments.

Some people travelling by private transport for the aforementioned reasons may be eligible for a 100 per cent reimbursement of the charges paid if the person they are transporting to the medical appointment is eligible for the NHS patient reimbursement, though this does not include travel to private medical appointments where these have not been sourced through the NHS. However, not

all may make use of this or be considered eligible by the relevant NHS body, who administer the reimbursement for patients.

People travelling by private vehicle eligible for the proposed discount for EVs will benefit from the proposed discount on the charge level. However, for those without an EV, the proposed increase in charge level may negatively impact their ability to travel to health and social care facilities. The proposed change to the Residents' Discount may also impact people who move into the CCZ or register for the discount after the proposed changes come into effect who are unable, or face barriers to, owning an EV. This impact may be disproportionately experienced by older people, pregnant and maternal women, and disabled people. Some people undergoing gender reassignment may also use a private vehicle to travel to certain medical appointments.

Disabled people, older people and people from Black, Asian and minority ethnic groups are more likely to be on low incomes in London and more likely to experience certain health inequalities and barriers to healthcare access, and the potential impacts of access to health and social care facilities may exacerbate these existing inequalities. People experiencing homelessness, asylum seekers and refugees may also be reliant on access to health and social care provided within the CCZ and be negatively impacted. This may lead to negative health outcomes including poorer physical health, mental health and potential impacts on mortality rates for these groups. However, the scale of this impact is likely to be negligible.

Alongside the NHS patient reimbursement scheme, certain discounts, exemptions and reimbursements which are provided may help mitigate the impact for some people. Vehicles in the disabled tax class are exempt from the Congestion Charge, and where a person is being transported within a vehicle with nine or more seats, the driver will be entitled to a 100 per cent discount on the charges through the existing 9+ seater discount. If a person with a Blue Badge is driving or being driven to a health or social care appointment, they will be entitled to a 100 per cent discount if their vehicle is added as a nominated vehicle on the Blue Badge holder's Road User Charging account.

Following feedback received during consultation, to further support residents who may have a reduced ability to purchase an EV who move into, are housed within, or register after the changes come into effect, we are recommending a modification to an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030²⁸², helping to minimise the scale of the of the proposed changes to the Residents' Discount. Additionally, the recommended modification to provide a 100 per cent discount for back to base electric car club vehicles based in the Residents' Discount zone will also, if approved, act as a mitigation minimising the scale of the impact of the proposed changes to the Residents' Discount for existing and future residents on low incomes who may require a vehicle to travel and for whom it may be harder to access EVs, without which they would have to pay the full user charge for travel in the CCZ within charging hours.

Overall, the impact on access to health and social care facilities is neutral.

²⁸² Refer to Section 4 for a list of the eligible benefits.

Impact on access to residential, informal and domestic care provision

As discussed in Section 10.3.3, there is potential for the proposed changes to the scheme to negatively impact care workers reliant on use of private vehicle where the charge is not covered by their employer (or they are an informal carer). If this leads to people providing care being unable to travel within or to the CCZ by private vehicle, it may negatively impact on people in receipt of care. This impact may have a disproportionate negative impact on older people, and disabled people.

The resultant reductions in care provision may lead to poorer health outcomes for these individuals who may have been reliant on their services. However, it is considered likely that this impact will be negligible to minor due to the charge level increase relative to the existing charge level, and the discounts and exemptions which may be available for use by carers when travelling in the CCZ.

Summary

Overall, the impact on access to health and social care is considered to be neutral. It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on travel by private vehicle to access or provide health and social care including the 100 per cent Blue Badge holder discount, and the NHS patient reimbursement scheme.

10.3.4.3 Overall impact

Objective: To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the city and between communities, reducing emissions of harmful atmospheric pollutants in areas of poorest air quality as well as minimising noise and vibration levels, as well as disruption to people and communities across London.

Overall, the impact of the Proposed Changes on achieving this objective is **neutral (0)**. This is due to the minor positive impact on mental and physical health due to minor changes in traffic levels, the minor positive impact on air quality, neutral impact on noise and on access to health and social care facilities, and the minor negative impact on access to residential, informal and domestic care provision.

10.3.5 Protected Characteristic and Disadvantaged Groups

Having assessed the potential impacts of the Proposed Changes on the people topics set out in the scope of this IIA in Section 3.3.1, the following section sets out and summarises impacts by protected characteristic and disadvantaged group. This provides an easy way to understand the potential impacts on and mitigations for different groups and supports us in carefully considering these impacts in developing the Proposed Changes.

Age – older people

The proposed increase in charge level may adversely impact older people travelling in or to the CCZ by private vehicle if they are unable to switch modes. Older people (aged 65+) may be more reliant on travel by car due to barriers faced when travelling by public transport. Older people are also more likely to be on lower incomes.

Mitigations for this impact include the 100 per cent discount for Blue Badge holders, exemption for vehicles in the disabled tax class, and Residents' Discount for existing residents of the CCZ.

The proposed discount for EVs may also help to mitigate this impact, though the discount level being lower than that provided through the current 100 per cent CVD means some may still struggle to afford the proposed charges. However, some older people may face barriers to owning an EV, due to the lack of accessible charge points, the cost of an EV, and the potential technological barriers. While older people registered for the Residents' Discount before 1 March 2027 will continue to receive the discount regardless of vehicle fuel type; as the population of CCZ residents ages, future older residents of the CCZ will from 1 March 2027 only be eligible for the Residents' Discount if they own an EV. Therefore, if residents get older and they require a vehicle and have not registered for a discount prior to 1 March 2027, the proposed change to the Residents' Discount may present a barrier to car ownership which negatively impacts on their ability to travel, though over time it is likely that the cost of EVs will reduce as their market share increases.

Following feedback received during consultation, to further support residents who may have a reduced ability to purchase an EV who move into, are housed within, or register after the changes come into effect, we are recommending a modification to provide an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030²⁸³. This will help to further minimise the scale of the impact on older people who may be in receipt of certain benefits due to being on lower incomes or due to a disability or mobility issue they experience. While this will not be available to older people (not eligible for other discounts or exemptions) applying after 2030, the impact will be further reduced at this time due to increases in the availability and affordability of EVs, and potential further improvements in charge points.

Additionally, the recommended modification to provide a 100 per cent discount for back to base electric car club vehicles based in the Residents' Discount zone will act as a mitigation to the proposed changes to the Residents' Discount for existing and future older residents who may require a vehicle to travel and for whom it may be harder to access EVs, without which they would have to pay the full user charge for travel in the CCZ within charging hours.

Some older people may also be reliant on the use of PHVs due to barriers faced when travelling in the CCZ. The potential increase in fares due to the proposed increase in charge level being passed onto customers by drivers may negatively impact them, as may a potential increase in the number PHV drivers refusing bookings which require travel into the CCZ during charging hours. This impact is likely to be limited, and some older disabled people will continue to be able to make use of the Taxicard scheme, which reduces the costs of using a taxi or PHV, or Dial-a-Ride service that both give people an alternative to using their own vehicle. Alternatives may also be available including taxis and Designated wheelchair Accessible PHVs which are exempt from the Congestion Charge when undertaking a booking. Additionally, the proposed discount for EVs will benefit drivers with EVs compared to the 'Do Nothing' scenario due to the reduced cost and potentially lower fares. While circa 27 per cent of PHVs are currently electric, the majority of newly registered vehicles are EVs. As such, the impact will diminish over time as vehicles are upgraded to meet licensing and larger operator requirements.

In order to receive the proposed discount for EVs, drivers will be required to register for Auto Pay. It is recognised that older people are significantly more likely than other age groups to be at risk of

²⁸³ Refer to Section 4 for a list of the eligible benefits.

digital exclusion due to a lack of access to the internet, with 73 per cent using the internet at home compared to 96 to 99 per cent of other people aged 16 and over.²⁸⁴ Due to this, some older people may face barriers to accessing the discount they may be eligible for and may not be able to benefit from discounted charges. To overcome this, we provide reasonable adjustment to ensure that we offer a suitable level of service to all customers including people who do not have access to our online service. Customers are able to contact our call centre to carry out functions such as setting up a discount or Auto Pay and are able to send in supporting evidence via post where necessary. This helps to ensure that people who may be digitally excluded, such as older people, are not negatively impacted by a lack of access to our online system.

Some older people may be reliant on care provided by paid, informal or voluntary care workers, as discussed in Section 10.3.3.1. Additionally, older people may be reliant on services provided by charitable organisations, as discussed in Section 10.3.2.2. If, as a result of the Proposed Changes, there are negative impacts of the provision of care or charitable services this could have a disproportionate negative impact on older people. This may lead to negative impacts on physical and mental health and increased social isolation.

Some older people may be reliant on use of a private vehicle to attend religious services or events and community groups which take place during charging hours, or medical appointments, as discussed in Sections 10.3.2.4, 10.3.2.3 and 10.3.4.2 respectively. The proposed changes may negatively impact on the ability of some older people to commute by private vehicle to attend these facilities or services. This could lead to negative impacts on physical and mental health, and reductions in social interaction and increased social isolation. The proposed discount for EVs may help to mitigate this impact for those who own or are able to own one. Additionally, alternative modes may be available for travel including taxis and PHVs, which some older people may be able to access at a reduced price through the Taxicard scheme. Some may also be able to access religious services or community groups using the Dial-a-Ride service. For those unable to switch, they may be eligible for the 100 per cent discount for Blue Badge holders, the exemption for vehicles in the disabled tax class, or the NHS patient reimbursement scheme when travelling to certain medical appointments (subject to eligibility). Older people travelling by bus may also be eligible for concessions, including the 60+ Oyster Card and Freedom Pass.

Older people are disproportionately impacted by road traffic collisions, and as discussed in Section 10.3.1.2 the small-scale reductions in traffic may lead to reductions in road collisions, which may disproportionately benefit older people walking or cycling in the CCZ.

Older people are disproportionately impacted by the negative health effects of poor air quality. As discussed in Section 10.3.4.1, the small-scale improvements in air quality resultant of the proposed scheme may disproportionately benefit older people.

²⁸⁴ [Ofcom \(2022\), Digital Exclusion Review](#)

Table 73: Summary of impacts for older people

Summary of impacts	Mitigations and enhancements (if any)
Older people may experience a disproportionately positive impact due to reductions in traffic and subsequent minor improvements in air quality and road safety. Some older people may be reliant on travel by private vehicle and therefore negatively impacted by the proposed charge level increase. Additionally, while some may benefit from the proposed new CVD, 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). These 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 the Residents' Discount zone will act as a further mitigation. 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, exemption for vehicles in the disabled tax class, Residents' Discount (for existing residents of the CCZ registered before the proposed changes come into effect), and NHS patient reimbursement (subject to eligibility). 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 9+ seats, the 100 per cent discount for Blue Badge holders, and NHS staff and patient reimbursement (subject to eligibility). 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.	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on private vehicle use including our discounts available for vehicles with 9+ seats, the 100 per cent Blue Badge discount and our Dial-a-Ride service. In addition to the Taxicard scheme. It is also recommended that we ensure there is awareness of the proposed changes to Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone, if our recommended modifications are approved.

Age – younger people

While it is likely that many younger people in London are more likely to travel by public and active travel to and within the CCZ, particularly by bus which may lead to them experiencing positive impacts of improved journey reliability by this mode due to minor reductions in traffic, some may be reliant on car travel as a passenger to access certain facilities and events. Some travelling by private modes may experience a disproportionate negative impact where this leads to them no longer being able to travel to these facilities or events, though the scale of this impact is likely to be negligible.

Some young people may be reliant on use of PHV or private vehicle to travel to education facilities which requires travel to or through the CCZ. This may be a particular need for young people in SEN schools or people in further education who are unable to travel by public or active transport. The proposed charge level increase may increase the price of travel by private vehicle or PHV, however the scale of the impact on access to education is considered to be negligible, as discussed in Section 10.3.2.5.

Some younger people may be reliant on services provided by community groups and charities, as discussed in Sections 10.3.2.3 and 10.3.2.2. If the proposed increase in charge level impacts on these services, it may have a disproportionate negative impact on younger people reliant on these services, particularly those in low-income households. This impact is considered to be minor negative.

The proposed changes to the Residents' Discount may mean that young people living within the CCZ who are not of legal age to drive will miss out on the discount for residents regardless of fuel type if they are unable to register prior to the proposed changes coming into effect (if an existing household member has not registered for the discount). This impact may be more acute amongst young people in low-income households, who, though less likely to own a car, may face financial barriers to accessing an EV or live in areas where charging infrastructure is not readily available. This impact is considered to be minor, due to the low levels of car ownership amongst both residents of the CCZ and low-income residents, and the wide availability of alternatives to private vehicle within the CCZ. We are also recommending a modification to provide a specific new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone. Additionally, due to the limit of one discount per household, young people would not be eligible for the discount if living with their parent or guardian who has already registered their vehicle for the discount. 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 act as a mitigation for residents on a low income or with a reduced ability to own or access an EV and minimise the scale of the impact.

Young people are disproportionately impacted by road collisions and may be disproportionately positively impacted by potential small-scale improvements in road safety as discussed in Section 10.3.1.2.

Young people are disproportionately impacted by the negative impacts of air quality and noise and will therefore benefit from improvements in air quality and potential reductions in noise as discussed in Section 10.3.4.1.

Young people are more likely to fear being the victim of crime when using public transport or walking and, as such, may be negatively impacted if they use these modes instead of driving, however they are also less likely to be car owners, and may therefore benefit from increased number of pedestrians due to 'safety in numbers', and the overall impact neutral.

Table 74: Summary of impacts for younger people

Summary of impacts	Mitigations and enhancements (if any)
Young people may experience a minor disproportionate positive impact due to 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. The impact of the proposed charge level increase for younger people reliant on private modes is considered to be neutral. 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). 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 as a mitigation helping to reduce the scale of the impact. 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. The proposed changes to the Residents' Discount may have a disproportionate negative impact on young people living in the CCZ who are yet to pass their driving test or yet to purchase a vehicle (if an existing member of their household has not already registered). However, the impact is minor. 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 (if approved) would help to further minimise the scale of the impact. Minor negative impacts on services provided by community groups and charities may have a disproportionate negative impact on young people reliant on these services.	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on private vehicle use including our discounts available for vehicles with 9+ seats, the 100 per cent Blue Badge discount and the NHS patient reimbursement. In addition to the Taxicard scheme and our Dial-a-Ride service. It is also recommended that we ensure there is awareness of the proposed changes to Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone, if our recommended modifications are approved. To help ensure public transport is a safe alternative for people who switch modes and have a fear of crime or harassment, it is recommended that we continue to increase public awareness of how to act in the event of crime or harassment on our network through marketing campaigns and ensure that our network staff are trained to effectively deal with instances of crime and harassment. In addition to further improving safety and security measures across our network through measures such as

Summary of impacts	Mitigations and enhancements (if any)
	improved lighting and enhanced CCTV coverage.

Disabled people

Disabled people are more likely to face barriers to travel by certain modes than non-disabled people. Therefore, travel by car (as a driver or passenger) or by PHV may be important modes of door-to-door travel for disabled people.

There are existing mitigations which help ensure disabled people who are reliant on car travel are not negatively impacted, including the 100 per cent discount for Blue Badge holders which can be applied to up to two vehicles, and the exemption for vehicles in the disabled tax class. Additionally, taxis, which are fully accessible, and wheelchair-accessible PHVs are exempt when undertaking a booking. However, it is recognised that not all disabled people will be eligible for discounts and may be reliant on services or travel provided by people that may be impacted by the proposed changes.

The proposed discount for EVs may benefit some, however the discount level being lower than that provided through the current 100 per cent CVD means some may still struggle to afford the proposed charges. Disabled people may face barriers to owning an EV, due to the lack of accessible charge points, the cost of owning and operating an EV, and the potential barriers that some may face relating to the technology and need for an adapted vehicle (if not eligible for a Blue Badge or disabled vehicle tax class exemption). Additionally, the current Residents' Discount is available for individuals who register before 1 March 2027 after which date only new registrants with an EV will be eligible. Therefore, if a resident who currently does not have a car experiences a change in their health leading to a disability requiring travel by car, this may present a barrier to car ownership which negatively impacts on ability to travel. However, alternatives may be available including taxis, PHVs, and car club vehicles which will receive a 100 per cent discount if they are back to base EVs based in bays in the Residents' Discount zone if our recommended modification to our proposals is approved.

Following feedback received during consultation, to further support residents who may have a reduced ability to purchase an EV who move into, are housed within, or register after the changes come into effect, we are recommending a modification to provide an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030²⁸⁵. If approved, this will help to further minimise the scale of the impact on disabled people who may be in receipt of certain benefits due to being on lower incomes or due to a disability or mobility issue they experience. While this will not be available to disabled people applying after 2030, the impact will be further reduced at this time due to increases in the availability and affordability of EVs, and potential further improvements in charge points.

Some disabled people may also be reliant on the use of PHVs for travel in the CCZ due to barriers faced by other modes. The potential increase in PHV fares due to the proposed increase in charge

²⁸⁵ Refer to Section 4 for a list of the eligible benefits.

level being passed onto customers by drivers may negatively impact them, as may a potential small increase in the number PHV drivers refusing bookings which require travel into the CCZ during charging hours. This impact is likely to be limited, and some disabled people will continue to be able to make use of the Taxicard scheme, which reduces the costs of using a taxi or PHV, or Dial-a-Ride service that give people an alternative to using their own vehicle. Alternatives may also be available including taxis and Designated wheelchair Accessible PHVs, which are exempt from the Congestion Charge when undertaking a booking.

Some disabled people, who require a private vehicle for travel to NHS appointments may be able to make use of the NHS patient reimbursement scheme when travelling to medical appointments in the CCZ either as a driver or passenger.

In order to receive the proposed discount for EVs, drivers will be required to register for Auto Pay. It is recognised that some disabled people may face barriers to use of online systems. Due to this, some may face barriers to accessing the discount they may be eligible for and may not be able to benefit from discounted charges. To overcome this, we provide reasonable adjustment to ensure that we offer a suitable level of service to all customers including people who do not have access to our online service. Customers are able to contact our call centre to carry out functions such as setting up a discount or Auto Pay and are able to send in supporting evidence via post where necessary. This helps to ensure that people who may be digitally excluded, such as some disabled people, are not negatively impacted by a lack of access to the system. A Road User Charging account can also be set on behalf of another person, and discounts such as the 100 per cent discount for Blue Badge holders can be applied for on a person's behalf.

Some disabled people may be reliant on care provided by paid, informal or voluntary care workers, as discussed in Section 10.3.3.1. Additionally, disabled people may be reliant on services provided by charitable organisations, as discussed in Section 10.3.2.2. If, as a result of the Proposed Changes there are negative impacts of the provision of care or charitable services, this could have a disproportionate negative impact on disabled people. This may lead to negative impacts on physical and mental health and increased social isolation. To help mitigate this impact, it is recommended that we continue to proactively promote the discounts and reimbursements that may be available to care workers when travelling with a person they provide care to, including the 100 per cent discount for Blue Badge holders which can be applied to up to two vehicles, and the NHS patient reimbursement scheme.

Some disabled people may be reliant on use of a private vehicle to attend religious services and community groups, or medical appointments, as discussed in Sections 10.3.2.4, 10.3.2.3 and 10.3.4.2 respectively. The proposed changes, particularly the proposed increase in charge level may negatively impact on the ability of some to commute by private vehicle to attend these facilities or services. The proposed discount for EVs may help to mitigate this impact for those who own or are able to own one. Additionally, alternative modes may be available for use including taxis and PHVs, which some may be able to access at a reduced price through the Taxicard scheme. Some may also be able to access religious services or community groups using the Dial-a-Ride service. For those unable to switch, they may be eligible for the 100 per cent discount for Blue Badge holders, the exemption for vehicles in the disabled tax class, or the NHS patient reimbursement scheme when travelling to medical appointments.

For those who choose to switch modes due to the financial cost of the proposed charge level, we offer a free Travel Mentoring Scheme to help people using public transport in and around London to become confident and independent travellers. Travel mentors can give advice by telephone and email to help plan an accessible route, provide a mentor to accompany people on their first few practice journeys to help them learn how to travel the network independently, and assist virtually using apps available on most smartphones.

Disabled people are disproportionately impacted by road traffic collisions, and as discussed in Section 10.3.1.2 the reductions in traffic may lead to reductions in road collisions, which may disproportionately benefit disabled people travelling by active modes in the CCZ.

Disabled people are disproportionately impacted by the negative health effects of poor air quality, particularly those with underlying health conditions exacerbated by poor air quality. As discussed in Section 10.3.4.1, the improvements in air quality resultant of the proposed scheme may disproportionately benefit disabled people.

Some disabled people may be more sensitive to noise from road traffic. The anticipated reductions in traffic within the CCZ may lead to minor reductions in noise, which while anticipated to be largely imperceptible, may be more noticed by and thus disproportionately benefit disabled people with an increased sensitivity to noise.

Table 75: Summary of impacts for disabled people

Summary of impacts	Mitigations and enhancements (if any)
Disabled 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, some with a sensitivity to noise may be more sensitive to the change). While some disabled people may benefit from the proposed new CVD, some may face barriers to 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). 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	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on private vehicle use including our discounts available for vehicles with 9+ seats, the 100 per cent Blue Badge discount and the NHS patient reimbursement. In addition to the Taxicard scheme, our Dial-a-Ride service and Travel Mentor scheme. It is also recommended that we ensure there is awareness of the proposed changes to Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone, if our

Summary of impacts	Mitigations and enhancements (if any)
by existing discounts and exemptions, including the exemption for vehicles with 9+ seats, the 100 per cent discount for Blue Badge holders, and NHS staff and patient reimbursement (subject to eligibility). 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. 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, 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.	recommended modifications are approved. To help ensure public transport is a safe alternative for people who switch modes and have a fear of crime or harassment, it is recommended that we continue to increase public awareness of how to act in the event of crime or harassment on our network through marketing campaigns and ensure that our network staff are trained to effectively deal with instances of crime and harassment.

Race

Black Londoners are less likely to own a car or drive, more likely to travel by bus than other Londoners, and Black and Asian Londoners are much less likely to cycle than White Londoners. Black Londoners may disproportionately benefit from improvements to journey reliability by bus in the CCZ due to the minor reductions in traffic. Furthermore, 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, Asian and minority ethnic Londoners.

As discussed in Section 10.3.3.3, the proposed changes may have a disproportionate negative impact on PHV drivers who do not own an EV or a wheelchair-accessible vehicle. A high proportion of PHV drivers in London are from a Black, Asian and minority ethnic background. However, it is up to PHV operators and drivers (where working as a sole operator) to decide how to absorb or pass on the charge and whether to enable non-electric PHV drivers to avoid the CCZ altogether – many operators already have processes in place to pass the charge onto passengers or to enable drivers to decide whether they wish to accept trips into the CCZ. Furthermore, the proposed discount for EVs will benefit drivers with EVs compared to the 'Do Nothing' scenario due to the reduced cost. While circa 27 per cent of PHVs are currently electric, the majority of newly registered vehicles are

EVs. As such, the impact will diminish over time as vehicles are upgraded to meet licensing and larger operator requirements.

As discussed in Section 6.4.5.4, people from Black, Asian and minority ethnic groups are more likely to be worried about personal security (i.e. being safe from crime or antisocial behaviour) while using public transport in London, and are also more likely to have experienced incidents while using public transport. The proposed increase in charge level may mean that some are required to switch to public transport, which may increase anxiety or incidents of experiencing crime or harassment. However, the scale of this impact is considered to be negligible.

A high proportion of care workers are from Black, Asian and minority ethnic groups, as highlighted in Section 6.4.12.5. The potential impact on care providers who are required to drive in the CCZ, as discussed in Section 10.3.3.1, may therefore have a disproportionately negative impact on Black, Asian and minority ethnic groups. It is recommended that we continue to proactively promote the discounts and reimbursements that may be available to care workers when travelling with a person they provide care to, including the 100 per cent discount for Blue Badge holders which can be applied to up to two vehicles, and the NHS patient reimbursement scheme. This recommendation may help to minimise the scale to which this minor negative impact is experienced by those who may be adversely impacted.

As highlighted in Section 6.4.5.4, people from certain Black, Asian and minority ethnic groups are more likely to be living in poverty. The proposed charge level increase and proposed changes to the Residents' Discount may mean that people from certain Black, Asian and minority ethnic groups may be adversely impacted if they are less able to afford an EV (if not registered for the Residents' Discount prior to 1 March 2027). This impact is considered to be minor due to the lower levels of driving amongst people on lower incomes and the low levels of driving in the CCZ by residents. In addition to the lower levels of driving and car ownership by Black Londoners, though levels are similar for Asian and other minority ethnic Londoners to White Londoners.

Following feedback received during consultation, to further support residents who may have a reduced ability to purchase an EV who move into, are housed within, or register after the changes come into effect, we recommend a 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, the impact will be further reduced at this time due to increases in the availability and affordability of EVs, and potential further improvements in charge points in the CCZ.

There is increased exposure to air pollution in areas that have a higher percentage of non-white ethnic groups, as discussed in Section 6.4.5.4. A greater proportion of Black, Asian and minority ethnic people are exposed to levels of high air pollution. As such, they will most benefit from the minor positive air quality benefits of the reduced traffic in the CCZ.

Black, Asian and minority ethnic people are more at risk of being injured in road collisions and, as such, will benefit more from the expected minor positive impacts on road safety as discussed in Section 10.3.1.2.

Black, Asian and minority ethnic people are particularly likely to fear being the victim of crime when using public transport and, as such, may be negatively impacted if they switch to these modes

instead of driving, As discussed in Section 10.3.1.1. However, the impact on crime and safety for Black, Asian and minority ethnic people is considered to be neutral.

Table 76: Summary of impacts for people based on their race

Summary of impacts	Mitigations and enhancements (if any)
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). 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, Asian and minority ethnic Londoners. 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. 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. However, those with EVs will benefit from the proposed new CVD. 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. Additionally the	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for carers and care workers (including PAs), including our discounts available for vehicles with 9+ seats and the 100 per cent Blue Badge discount and ensure that our NHS patient reimbursement scheme continues to be available for those who may require use of it. It is also recommended that we ensure there is awareness of the proposed changes to Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone, if our recommended modifications are approved. To help ensure public transport is a safe alternative for people who switch modes and have a fear of crime or harassment, it is recommended that we continue to increase public awareness of how to act in the event of crime or harassment on our network through marketing campaigns and ensure that our network staff are trained to effectively deal with instances of crime and harassment. In addition to further improving safety and security measures across our

Summary of impacts	Mitigations and enhancements (if any)
recommended 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.	network through measures such as improved lighting and enhanced CCTV coverage.

Religion or Belief

Some Londoners may require travel to religious facilities or events in the CCZ or require travel via the CCZ to access services outside of it during charging hours. As discussed in Section 10.3.2.4, some may be reliant on travel by private vehicle to these facilities or services and in recent years, there has been an increase in the number of hate crimes experienced by people of certain religions, with significant increases in antisemitic and Islamophobic hate crimes in London and nationally.²⁸⁶ Therefore, use of a private vehicle to access religious services may be preferred by some people due to a fear of crime and harassment when travelling to these services.

It is considered that the impact on access to religious services is minor negative for religious people who require travel by private vehicle to religious services during charging hours. However, the proposed modifications to provide an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030²⁸⁷, and 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone help to mitigate this impact for residents of the CCZ, if approved.

As highlighted in Section 10.3.3.3, a high proportion of PHV drivers are Muslim. Therefore, they may experience a disproportionate negative impact due to the potential negative on PHV drivers on low incomes with a non-EV or non-wheelchair accessible vehicle. Given that Muslims make up a high proportion of PHV drivers, it can be expected that a greater number of Muslim PHV drivers would be impacted by increases in their professional costs if they need to drive into the CCZ during charging hours due to the proposed increase in charge level (unless they have a wheelchair-accessible PHV as these are exempt). However, it is up to the operator and drivers (where working as a sole operator) to decide how to absorb or pass on the charge and whether to enable non-electric PHV drivers to avoid the CCZ altogether – many operators already have processes in place to pass the charge onto passengers or to enable drivers to decide whether they wish to accept trips into the CCZ.

Furthermore, the proposed discount for EVs will benefit drivers with EVs compared to the 'Do Nothing' scenario due to the reduced cost. While circa 27 per cent of PHVs are currently electric, the majority of newly registered vehicles are EVs. As such, the impact will diminish over time as vehicles are upgraded to meet licensing and larger operator requirements.

²⁸⁶ [Home Office \(October 2024\), Hate crime, England and Wales, year ending March 2024](#)

²⁸⁷ Refer to Section 4 for a list of the eligible benefits.

Table 77: Summary of impacts for people based on their religion or belief

Summary of impacts	Mitigations and enhancements (if any)
Potential minor negative impact of the proposed charge level increase 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. However, 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 the Residents' Discount zone would help to minimise the scale of this impact for residents of the CCZ. 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.	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on private vehicle use including our discounts available for vehicles with 9+ seats, and the 100 per cent Blue Badge discount. In addition to the Taxicard scheme and our Dial-a-Ride service. It is also recommended that we ensure there is awareness of the proposed changes to Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone, if our recommended modifications are approved. To help ensure public transport is a safe alternative for people who switch modes and have a fear of crime or harassment, it is recommended that we continue to increase public awareness of how to act in the event of crime or harassment on our network through marketing campaigns and ensure that our network staff are trained to effectively deal with instances of crime and harassment. In addition to further improving safety and security measures across our network through measures such as improved lighting and enhanced CCTV coverage.

Sex

In London, women are more likely than men to travel by bus, and therefore may benefit from improvements to travel by this mode in the CCZ due to the anticipated reductions in traffic. Women are also less likely to cycle than men, and the improvements in perceptions of safety due to minor reductions in traffic may incentivise greater uptake of cycling by women travelling in the CCZ.

A high proportion of care workers are women, as highlighted in Section 6.4.12.5, and women are more likely than men to be informal carers. The potential minor negative impact on care providers who are required to drive in the CCZ, as discussed in Section 10.3.3.1, may have a disproportionate impact on women.

As discussed in Section 6.4.8.3, women are more likely to be worried about personal security (i.e. being safe from crime or antisocial behaviour) while using public transport in London, and are also more likely to have experienced unwanted sexual behaviour while using public transport. The proposed increase in charge level may mean that some are required to switch to public transport, which may increase anxiety or incidents of experiencing crime or harassment. Additionally, some may prefer use of PHVs for this reason, and may experience increases in fares when travelling by non-electric PHV. However, this impact is overall considered to be negligible. Additionally, the proposed modifications to provide an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030²⁸⁸, and a 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone help to mitigate this impact for women who are residents of the CCZ, if approved.

The potential minor negative impact on PHV drivers may have a disproportionate impact on men due to the demographics of the industry, where they do not pass on the charge to customers. Women may experience a differential negative impact as they may be more likely to be working part-time, as discussed in Section 10.3.3.3. However, the proposed discount for EVs will benefit drivers with EVs compared to the 'Do Nothing' scenario due to the reduced cost. While circa 27 per cent of PHVs are currently electric, the majority of newly registered vehicles are EVs. As such, the impact will diminish over time as vehicles are upgraded to meet licensing and larger operator requirements.

Table 78: Summary of impacts for people based on their sex

Summary of impacts	Mitigations and enhancements (if any)
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, and the proposed new CVD will benefit those with EVs. 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	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for carers and care workers (including PAs), including our discounts available for vehicles with 9+ seats and the 100 per cent

²⁸⁸ Refer to Section 4 for a list of the eligible benefits.

Summary of impacts	Mitigations and enhancements (if any)
(including PHVs which may experience increased fares) to travel. However, these are considered to be negligible . The potential negative impact of the proposed charge level increase on PHV drivers may have a disproportionate negative impact on men, 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.	Blue Badge discount and ensure that our NHS patient reimbursement scheme continues to be available for those who may require use of it. It is also recommended that we ensure there is awareness of the proposed changes to Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone, if our recommended modifications are approved. To help ensure public transport is a safe alternative for people who switch modes and have a fear of crime or harassment, it is recommended that we continue to increase public awareness of how to act in the event of crime or harassment on our network through marketing campaigns and ensure that our network staff are trained to effectively deal with instances of crime and harassment. In addition to further improving safety and security measures across our network through measures such as improved lighting and enhanced CCTV coverage.

Pregnancy and Maternity

Two maternity hospitals are located in the CCZ – University College London Hospital (UCLH) and St Thomas's Hospital. UCLH sits on the boundary of the CCZ and the patient vehicle access is outside the CCZ. To access St Thomas's Hospital by car it is necessary to drive in the CCZ. Some pregnant women may be more reluctant to use public transport and less able to walk or cycle particularly in late pregnancy or at the time of birth. This impact is considered to be neutral due to the alternatives that may be available including taxis and PHVs. Additionally, some may be eligible for the NHS patient reimbursement scheme if they meet the eligibility criteria. For those travelling on public transport, they may benefit from initiatives such as our 'please offer me a seat' badges and priority seating on our transport network.

During pregnancy, and after giving birth when travelling with their child, some women may prefer to travel by private modes for comfort and safety purposes. The proposed changes to the Residents' Discount may mean that some women who are not registered for the discount before 1 March 2027 that become pregnant and wish to drive during this period, may face barriers to purchasing or accessing an EV.

Following feedback received during consultation, we are recommending a modification to provide an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030²⁸⁹. This will help to further reduce the impact on pregnant and maternal women who may be in receipt of certain benefits if they experience a change in their travel needs during or following pregnancy. While this will not be available to people applying after 2030, the impact will be further reduced at this time due to increases in the availability and affordability of EVs, and potential further improvements in charge points. Additionally, the recommended modification for a 100 per cent discount for back to base electric car club vehicles based in the Residents' Discount zone will, if approved, help to ensure these are available when car travel may be required during or after pregnancy.

Additionally, the proposed charge level increase may impact travel for those without an EV. This may be a particular issue for women on low incomes, though car ownership levels are lower amongst people on low incomes. As such, due to the financial impact of the charge, they may be unable to travel by private vehicle. This impact is considered to be overall negligible and limited in scale, and alternatives are available for potential temporary changes to travel mode during pregnancy including taxis, PHVs, car clubs (of which back to base electric models based in the Residents' Discount zone will receive a 100 per cent discount if our recommended modification is approved) and rental cars.

Pregnant women and their unborn child may be negatively impacted by the direct and indirect effects of poor air quality and noise, as discussed in Section 6.4.7.2. The anticipated improvements in air quality and potential marginal reductions in noise may therefore have positive health impacts for this group.

Table 79: Summary of impacts for pregnant and maternal women

Summary of impacts	Mitigations and enhancements (if any)
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). 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 be minor and limited in scale, with the recommended modifications 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	It is recommended that we ensure there is awareness of the proposed changes to Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone, if our recommended modifications are approved.

²⁸⁹ Refer to Section 4 for a list of the eligible benefits.

Summary of impacts	Mitigations and enhancements (if any)
per cent discount for back to base car club EVs based in the Residents' Discount zone providing further mitigations if approved.	

People on low incomes

People on low incomes are less likely to drive or own a car in London, are more likely to travel by bus or walk, and car ownership levels in the CCZ are significantly lower than London-wide as demonstrated in Section 6.4.12.6. Additionally, people on low incomes are less likely to travel into the CCZ by private transport as shown in Table 62.

It is therefore anticipated that most people on low incomes travelling in the CCZ will benefit from the reductions in traffic, potentially making travel by bus more reliable within the CCZ.

However, a small proportion of people on low incomes may be reliant on travel by private vehicle in the CCZ. This may include certain healthcare workers, carers, tradespeople and PHV drivers, who may experience a disproportionate negative impact due to the proposed price increase, particularly if they are unable to pass on the charge or have travel costs reimbursed by their employer or qualify for the NHS staff reimbursement.

Some people on low incomes may be eligible for existing discounts, including the 100 per cent discount for Blue Badge holders, and the proposed new CVD may help to mitigate this impact. However, though it provides drivers with EVs with a lower charge level compared to the 'Do Nothing' scenario, the discount level being lower than that provided through the current 100 per cent CVD means some may still struggle to afford the proposed charges. Furthermore, it is recognised that some people on lower incomes may face financial barriers to owning an EV due to the higher upfront cost and may live in locations where charging infrastructure is less accessible.

It is considered that the proposed charge increase will have a minor disproportionate negative impact on people on low incomes who need to travel by private vehicle to or for work and are unable to switch modes, unable to pass on or be reimbursed the cost of the Congestion Charge.

Existing residents on low incomes registered for the 90 per cent residents' discount will continue to receive this discount, regardless of vehicle fuel type. However, residents who register for the 90 per cent discount after the Proposed Changes come into effect will only receive the discount if their vehicle is an EV. As previously mentioned, car ownership is lower amongst low-income Londoners, and car ownership and usage are significantly lower in the CCZ compared to other areas. Nevertheless, some people on low incomes who move into the area or are housed within the CCZ by their local authority may require use of a car and may face barriers to EV ownership. If not eligible for other discounts, such as the 100 per cent discount for Blue Badge holders, the proposed changes to the Residents' Discount may have a disproportionately negative impact on low-income residents who are unable to have the benefit of the discount because they do not have an EV.

The proposed change to the Residents' Discount may also impact residents on low incomes who are waiting to pass their driving test or planning to purchase a vehicle and are now faced with an additional financial barrier to car ownership which may be experienced to a lesser extent by people on higher incomes. This impact is considered to be minor negative due to the low levels of car ownership in the CCZ, the low levels of driving and car ownership by both low-income residents and CCZ residents, and the low proportion of residents who register for the discount each year. Additionally, the notice period for the changes proposed to the Residents' Discount will help to ensure that residents planning to drive in the near future can register before the proposed change comes into effect. While we do not have demographic or income data for people who are registered for the Residents' Discount, it is considered that only a small proportion of these are likely to be low-income residents due to our data showing that low-income Londoners are less likely to have access to a car in their household and are less likely to travel by car, as discussed in Section 6.4.12.6. Furthermore, this impact may reduce over time as the availability of charging infrastructure increases within the CCZ, and the price of EVs reduces as more become available on the first- and second-hand markets.

Following feedback received during consultation, to further support residents who may have a reduced ability to purchase an EV who move into, are housed within, or register after the changes come into effect, we are recommending a modification to provide an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030²⁹⁰. This will help to further reduce the impact on people on lower incomes or with a reduced ability to access an EV. While this will not be available to people applying after 2030, the impact will be further reduced at this time due to increases in the availability and affordability of EVs, and potential further improvements in charge points.

Additionally, the recommended modification to provide a 100 per cent discount for back to base electric car club vehicles based in the Residents' Discount zone will act as a mitigation to the proposed changes to the Residents' Discount for existing and future residents who may require a vehicle to travel and for whom it may be harder to access EVs, without which they would have to pay the full user charge for travel in the CCZ within charging hours.

As discussed in Section 8.3.1.2, the proposed increase in charge level may lead to an increase in PHV fares. People on low incomes reliant on PHVs may be more sensitive to this change and be disproportionately negatively impacted. This impact is considered to be minor due to the availability of alternative modes in the CCZ including taxis, and PHVs which are EVs may charge lower fare prices due to the proposed new CVD.

As discussed in Section 10.3.3.3, PHV drivers who do not drive an EV and are unable to pass the charge onto passengers may be disproportionately negatively impacted by the proposed increase in charge level. A large proportion of PHV drivers are on lower incomes, and therefore may be impacted to a greater extent than those on higher incomes where this leads to an impact on their income or access to job opportunities. However, it is up to the operator and drivers (where working as a sole operator) to decide how to absorb or pass on the charge and whether to enable non-electric PHV drivers to avoid the CCZ altogether – many operators already have processes in

²⁹⁰ Refer to Section 4 for a list of the eligible benefits.

place to pass the charge onto passengers or to enable drivers to decide whether they wish to accept trips into the CCZ.

Londoners living in the most deprived areas are disproportionately impacted by road collisions, as highlighted in Section 6.4.12.9, and will benefit from potential improvements in road safety within the CCZ due to minor reductions in traffic.

As highlighted in Section 6.4.12.9, poor air quality has greater impacts on London's deprived communities. The anticipated minor improvements in air quality resultant of the proposals may have a disproportionate positive impact on people on low incomes living in more deprived areas where improvements in air quality are realised.

Londoners in the most deprived areas live in areas with greater levels of noise from road traffic. The reductions in noise from road traffic due to the forecast reductions in traffic, while largely considered to be imperceptible, may disproportionately benefit people on low incomes living in more deprived areas within the CCZ where reductions in noise may be more noticeable.

Table 80: Summary of impacts for people on low incomes

Summary of impacts	Mitigations and enhancements (if any)
Minor disproportionate negative impact on people on low incomes who require travel by non-electric private vehicle due to the proposed charge level increase, 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. Minor disproportionate negative impact on people on low incomes who are not registered for the Residents' Discount or move into (or are housed in) the CCZ after the proposed changes come into effect, and require use of a private non-EV. However, 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 modification to provide a 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone. People living in more deprived areas may experience a minor disproportionately 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).	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on private vehicle use including our discounts available for vehicles with 9+ seats, the 100 per cent Blue Badge discount and the NHS patient reimbursement. In addition to the Taxicard scheme and our Dial-a-Ride service. It is also recommended that we ensure there is awareness of the proposed changes to Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone, if our recommended modifications are approved.

Asylum seekers and refugees

Asylum seekers and refugees may be reliant on services provided by community groups and charitable organisations in the CCZ. As discussed in Section 10.3.2, there is a potential minor negative impact on charities and community groups operating in the CCZ due to the proposed charge level increase potentially impacting already constrained budgets, and the potential risk to provision of services for multiple protected characteristic and disadvantaged groups, including asylum seeker and refugees. However, it is considered unlikely that the additional cost will lead to a reduction in provision of services due to the scale of the charge level increase relative to the existing charge level.

Table 81: Summary of impacts for asylum seekers and refugees

Summary of impacts	Mitigations and enhancements (if any)
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.	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on private vehicle use including our discounts available for vehicles with 9+ seats, the 100 per cent Blue Badge discount and the NHS patient reimbursement.

Homeless people

As shown in Section 6.4.10, there are relatively high levels of homeless people seen rough sleeping within City of London and Westminster, and the CCZ may provide a central and easily accessible location for charitable and community organisations to provide services to homeless people in the area.

As discussed in Section 10.3.2.2, there is a potential minor negative impact on charities and community groups operating in the CCZ due to the proposed charge level increase potentially impacting already constrained budgets, and the potential risk to provision of services for multiple protected characteristic and disadvantaged groups, including homeless people. However, it is considered unlikely that the additional cost will lead to a reduction in provision of services due to the scale of the charge level increase relative to the existing charge level.

Table 82: Summary of impacts for homeless people

Summary of impacts	Mitigations and enhancements (if any)
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.	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on private vehicle use including our discounts available for vehicles with 9+ seats, the 100 per cent Blue Badge discount and the NHS patient reimbursement.

Carers

As discussed in Section 10.3.3.1, the proposed increase in charge level may have a disproportionate negative impact on carers who are required to travel by private vehicle in the CCZ who are on low incomes and not reimbursed by their employer for the cost of travel in the CCZ. Additionally, there is a potential negative impact on informal carers who would require travel by private vehicle and must cover the cost of travel into the CCZ. The recommended modification, if approved, 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 mitigate this impact for certain residents of the CCZ on low incomes undertaking care responsibilities (including those in receipt of Carer's Allowance). In addition, the modification for a 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone provides further mitigation for existing and future residents who undertake care work (formally or informally) or carers who provide services in the CCZ.

It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for carers and care workers (including PAs), including our discounts available for vehicles with 9+ seats and the 100 per cent Blue Badge discount and ensure that our NHS patient reimbursement scheme continues to be available for those who may require use of it. It is also recommended that we ensure there is awareness of the proposed changes to Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the CCZ, if our recommended modifications are approved.

Table 83: Summary of impacts for carers

Summary of impacts	Mitigations and enhancements (if any)
Minor disproportionate negative impact 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, due to the proposed charge level increase. Existing mitigations	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for carers and care

Summary of impacts	Mitigations and enhancements (if any)
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, 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.	workers (including PAs), including our discounts available for vehicles with 9+ seats and the 100 per cent Blue Badge discount and ensure that our NHS patient reimbursement scheme continues to be available for those who may require use of it. It is also recommended that we ensure there is awareness of the proposed changes to Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the CCZ, if our recommended modifications are approved.

Gender Reassignment and Sexual Orientation (LGBT)

As highlighted in Section 6.4.9.2, LGBT Londoners are more likely to have been subjected to sexual comments or sexual gestures when using public transport compared to heterosexual and/or cisgender Londoners and are more likely to have experienced or witnessed hate crime. Some may prefer to commute by modes such as private vehicle or PHV or taxi due to a fear or experience of being victim of crime or harassment. Some people undergoing gender reassignment may also use a private vehicle to travel to medical appointments.

The proposed increase in charge level may mean that some LGBT people who currently need or choose to drive in the CCZ may be less able to afford the charge and are required to switch to active travel or public transport. Additionally, the potential increase in PHV fares and potential reduction in their availability may impact their ability to travel by this mode, though assessment data as shown in Section 7, demonstrates a negligible reduction in PHV numbers in the CCZ. As a result, they may experience increased stress and anxiety due to travelling by public transport or active travel, and may be at greater risk of being victim of crime or harassment, as discussed in Section 10.3.1.1. However, the scale of the impact is considered to be negligible. Alternatives are also available for travel in the CCZ including taxis.

Table 84: Summary of impacts for LGBT people

Summary of impacts	Mitigations and enhancements (if any)
As a result of the proposed charge level increase, potential negative impacts were identified on crime and safety for people LGBT people and 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, including when	To help ensure public transport is a safe alternative for people who switch modes and have a fear of crime or harassment, it is recommended that we continue to increase public awareness of how

Summary of impacts	Mitigations and enhancements (if any)
travelling to medical appointments when undergoing gender reassignment. However, these are considered to negligible and limited in scale, and those with EVs will benefit from the proposed new CVD.	to act in the event of crime or harassment on our network through marketing campaigns and ensure that our network staff are trained to effectively deal with instances of crime and harassment. In addition to further improving safety and security measures across our network through measures such as improved lighting and enhanced CCTV coverage.

10.3.5.1 Overall impact

Objective: To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population.

Overall, the impact of the Proposed Changes on achieving this objective is **neutral (0)**. Minor negative impacts have been identified for people on low incomes, older people, disabled people, religious people, and people from certain Black, Asian and minority ethnic groups resulting from the proposed charge level increase and proposed changes to the Residents' Discount, and the minor negative impacts on PHV drivers and carers impacting on Black, Asian and minority ethnic women (carers) and Black, Asian and minority ethnic Muslim men (PHV drivers). However, these impacts are considered to be limited in scale due to the low levels of driving within the CCZ, and the lower frequency of travel by car by people on low incomes and certain minority ethnic groups.

Additionally, there are a number of mitigations in place to help minimise negative impacts on people who may require travel by private vehicle, and the proposed discount for EVs provides a benefit for people with these vehicles, the proportion of whom will increase as the market share of EVs increases over time.

The recommended modifications to our proposals, including the extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030 and the new 100 per cent discount for back to base car club EVs based in bays in the Residents' Discount zone will, if approved, help to further mitigate the negative impacts for residents of the CCZ.

The minor positive impacts on traffic levels and subsequently road safety and air quality resultant of the Proposed Changes also help to offset the minor negative impacts identified, leading to an overall neutral impact.

10.4 Summary of Assessments

Table 85: Summary of findings of the potential impacts of Proposed Changes to the Congestion Charge on London's People (Health and Equality)

Topic	IIA Objective	Description of Impact	Equality Groups Impacted	Impact Rating	Scale	Sensitivity	Potential Mitigation and Enhancement
Crime Reduction and safety	To contribute to safety and security and perceptions of safety.	Neutral impact on crime and fear of crime. Minor positive impact on road safety in the CCZ due to reductions in traffic.	Black, Asian and minority ethnic people, disabled people, older people and children may disproportionately benefit from minor improvements in road safety, as they are at greater risk from road collisions in London.	Minor positive (+1)	Low	Low	To help ensure that public transport is a safe alternative mode for people who switch modes and have a fear of crime or harassment, it is recommended that we continue to reduce the risk and increase public awareness of how to act in the event of crime or harassment on our network through marketing campaigns and ensure that our network staff are trained to effectively deal with instances of crime and harassment. In addition to further improving safety and security measures across our network through measures such as improved lighting and enhanced CCTV coverage. To help ensure that improvements in road safety are realised and enhanced, it is recommended that we continue to seek opportunities to increase the attractiveness of cycling and walking and bus to promote use and reliability of these modes where appropriate, and

Topic	IIA Objective	Description of Impact	Equality Groups Impacted	Impact Rating	Scale	Sensitivity	Potential Mitigation and Enhancement
Accessibility, Connectivity and Social Integration							further increase potential for people to travel using active modes in a safe environment. It is also recommended that we ensure there is awareness of the changes to the Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent Discount for back to base car club EVs based in bays in the CCZ, if our recommended modifications are approved.
	To maximise accessibility for all in and around London and to enhance and improve connectivity for all to and from and within and around London including expanding travel horizons for those requiring safe, accessible travel options. To ensure London has socially integrated communities	Minor positive impact on travel by active and sustainable modes. Minor negative impact on community groups. Minor negative impact on access to community groups. Minor negative impact on charities. Minor negative impact on access to religious services. Neutral impact on access to education	<u>Impact on community groups, charities, and access to community groups:</u> Disabled people, Young People, Older People, Homeless People, Asylum Seekers and Refugees, People on Low Incomes may be disproportionately negatively impacted. <u>Impact on access to religious services:</u> Religious people, Disabled people, Young People, Older People, People on Low Incomes may be	Minor Negative (-1)	Low	Low	It is recommended that we continue to seek opportunities to increase the attractiveness of cycling and walking and bus to promote use of these modes, and further increase potential for people to travel using reliable public transport, and active modes in a safe environment. It is recommended we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on private vehicle use including our discounts available for vehicles with nine+ seats, the 100 per cent Blue Badge discount and our Dial-a-Ride service in addition to the Taxicard scheme. It is also recommended that we ensure there is awareness of the

Topic	IIA Objective	Description of Impact	Equality Groups Impacted	Impact Rating	Scale	Sensitivity	Potential Mitigation and Enhancement
Health and Health Inequalities	which are strong, resilient and free of prejudice.		disproportionately negatively impacted.				proposed changes to the Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the CCZ, if our recommended modifications are approved.
	To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities, reducing emissions of harmful atmospheric pollutants in areas of poorest air quality as well as minimising noise and vibration levels, as well as disruption to people and	Minor positive impact on mental and physical health due to changes in traffic levels against the 'Do Nothing' scenario. Minor positive impact on air quality against the 'Do Nothing' scenario. Neutral impact on noise. Neutral impact on access to health and social care facilities. Minor negative impact on access to residential, informal and domestic care provision.	Minor positive impact on mental and physical health due to positive changes in traffic levels, and air quality, disproportionately positively impacting older people, younger people, disabled people, people from Black, Asian and minority ethnic backgrounds, and people on low incomes. Minor negative impact on access to residential, informal and domestic care provision, disproportionately negatively impacting	Neutral (0)	Low	Medium	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on travel by private vehicle to access or provide health and social care including the 100 per cent Blue Badge holder discount, and the NHS patient reimbursement scheme.

Topic	IIA Objective	Description of Impact	Equality Groups Impacted	Impact Rating	Scale	Sensitivity	Potential Mitigation and Enhancement
Access to Jobs and Training	communities across London.		older people, and disabled people.				
	To improve London's people's access to employment opportunities and training, reducing barriers to participation and supporting inclusive economic growth.	Minor negative impact on carers on low incomes providing services to vulnerable groups by private vehicle, where charge is not covered by their employer or providing informal care due to the proposed charge level increase. Neutral impact on access to work or training for people who face barriers to travel by public transport or active travel. Neutral impact on NHS workers.	Negative impact on care workers may have a disproportionately negative impact on Black, Asian and minority ethnic women due to the demographics of the industry. The impact on carers may lead to minor indirect negative impacts on disabled people and older people reliant on formal and informal care provision. Negative impact on PHV drivers may have a disproportionately negative impact on	Minor negative (-1)	Low	Medium	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for carers and care workers (including PAs), including our discounts available for vehicles with nine+ seats and the 100 per cent Blue Badge discount and ensure that our NHS staff and patient reimbursement scheme continues to be available for those who may require use of it. It is also recommended that we ensure there is awareness of the proposed changes to Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the CCZ, if our recommended modifications are approved.

Topic	IIA Objective	Description of Impact	Equality Groups Impacted	Impact Rating	Scale	Sensitivity	Potential Mitigation and Enhancement
Protected Characteristics and		Minor negative impact on low-income workers or private hire vehicle (PHV) drivers that require to travel to work in the CCZ during charging hours who do not qualify for the proposed new CVD, and the charge is not passed on to the customer or covered by the operator/employer, due to the proposed charge level increase. This impact is considered minor due to the small proportion of workers operating primarily in the CCZ unable to pass on the charge or have it covered by their employer.	Black, Asian and minority ethnic and Muslim men due to the demographics of the PHV industry in London. The impact on PHV drivers may lead to minor indirect negative impacts on disabled people and older people reliant on PHVs for door-to-door transport.				
	To make London a fair and inclusive city	While the proposed new CVD will provide a benefit for those	People on low incomes, Black, Asian and minority ethnic	Neutral (0)	Low	Low	It is recommended that we continue to proactively promote our existing discounts, exemptions and

Topic	IIA Objective	Description of Impact	Equality Groups Impacted	Impact Rating	Scale	Sensitivity	Potential Mitigation and Enhancement
Disadvantaged Groups	where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population.	with EVs compared to a do-nothing scenario, the proposed charge level increase may have a disproportionate negative impact on people on low incomes without an EV required to drive in the CCZ, particularly for those less able to use alternative modes to travel, including carers and PHV drivers. Due to the demographics of these sectors, it may lead to secondary negative impacts on Black, Asian and minority ethnic women (carers) and Black, Asian and minority ethnic Muslim men (PHV drivers). This may also have a minor	people, older people and disabled people may experience a minor disproportionate negative impact due to the proposed charge level increase and proposed changes to the Residents' Discount. Older people, younger people, disabled people, people from Black, Asian and minority ethnic backgrounds, and people on low incomes may experience a disproportionate positive impact from minor positive impacts on traffic levels and subsequently road safety and air quality.				reimbursements which may be available for people who may be reliant on travel by private vehicle to access or provide health and social care including the 100 per cent Blue Badge discount, and the NHS staff and patient reimbursement scheme. It is also recommended that we ensure there is awareness of the proposed changes to the Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the CCZ, if our recommended modifications are approved.

Topic	IIA Objective	Description of Impact	Equality Groups Impacted	Impact Rating	Scale	Sensitivity	Potential Mitigation and Enhancement
		disproportionate negative impact on older people, disabled people and people from certain Black, Asian and minority ethnic groups who are more likely to be on low incomes. Disproportionate negative impact on people on low incomes due to the proposed changes to the Residents' Discount, due to the barriers to ownership of an EV people on low incomes may face. This may also have a minor disproportionate negative impact on older people, disabled people and people from certain Black, Asian and minority ethnic groups who are more					

Topic	IIA Objective	Description of Impact	Equality Groups Impacted	Impact Rating	Scale	Sensitivity	Potential Mitigation and Enhancement
		likely to be on low incomes. Minor positive impacts on traffic levels and subsequently road safety and air quality.					

11 Summary of Impacts and Potential Mitigation

This section provides a consolidated list of existing and potential measures to mitigate negative impacts identified in this report as well as potential enhancement measures which could support positive impacts arising from the Proposed Changes to the Congestion Charge.

Table 86 Summary of impacts and proposed mitigations and enhancements

Topic	Description of Impacts	Impact rating	Proposed mitigations and enhancements
London's Economy			
Employment	Neutral impacts overall, with potential for minor relative impacts for those using vehicles to work.	0 Neutral	To support EV drivers, it is recommended that we continue to support the delivery of charging infrastructure in central London to enable a sufficient and appropriate level of charging and support the transition from diesel to EVs. In addition, it is recommended that we continue the promotion of alternative cleaner vehicles for freight and servicing, in line with our Cargo Bike action plan (2023), which can offer an alternative option allowing operators to avoid the cost of the Congestion Charge. It is also recommended that we continue to implement wider policies and on street interventions to support further traffic reduction and journey time savings for those working in the CCZ.
Businesses	Neutral impacts overall, with potential for both minor negative and positive impacts for some sectors.	0 Neutral	Continue to bring forward policies and programmes to support MTS objectives in central London. To support businesses using EVs, it is recommended that we continue to support the delivery of charging infrastructure in central London to enable a sufficient and appropriate level of charging and support the transition from diesel to EVs.

Topic	Description of Impacts	Impact rating	Proposed mitigations and enhancements
			In addition, it is recommended that we continue the promotion of alternative cleaner vehicles for freight and servicing, in line with our Cargo Bike action plan (2023), which can offer an alternative option allowing operators to avoid the cost of the Congestion Charge.
London's wider economy	Neutral impacts overall, with impacts likely to be negligible given the small comparable size of the charge increase with London's economic output	0 Neutral	Further measures to continue to reduce traffic and congestion in central London, enabling travel time savings and increased productivity in the CCZ.
London's Environment			
Air quality	Minor reduction in annual emissions of NO _x , PM ₁₀ and PM _{2.5} within the CCZ during charging hours, against the 'Do Nothing' ²⁹¹ scenario.	+1 Minor Positive	Further measures to continue to improve traffic reduction and sustainable mode share will enhance the reduction in NO_x and PM pollutants. It is recommended that we continue to support the delivery of charging infrastructure in central London to enable a sufficient and appropriate level of charging and support the transition from more polluting vehicles to EVs. Continue the promotion of alternative cleaner vehicles for freight and servicing, in line with our Cargo Bike action plan (2023).
Climate change	Minor reduction in annual emissions of CO ₂ within the CCZ during charging hours, against the 'Do Nothing' scenario.	+1 Minor Positive	Further measures to continue to improve traffic reduction will enable a reduction on CO₂ pollutants. It is recommended that we continue to support the delivery of charging infrastructure in central London to enable a sufficient

²⁹¹ 'Do Nothing' is what would happen without further intervention – it means that the charge level remains at £15 and the CVD ends. This is the default position, since 2018 when the CVD was established. The proposals would change this, offering a new CVD and support for EV drivers for longer.

Topic	Description of Impacts	Impact rating	Proposed mitigations and enhancements
			and appropriate level of charging and support the transition from more polluting vehicles to EVs. Continue the promotion of alternative cleaner vehicles for freight and servicing, in line with our Cargo Bike action plan (2023).
Noise	Overall neutral impact on the noise environment. Minor positive impact expected on noise levels, however not expected to be perceptible by people.	0 Neutral	Further measures to continue to improve traffic reduction will enable a reduction in noise coming from road traffic. It is recommended that we continue to support the delivery of charging infrastructure in central London to enable a sufficient and appropriate level of charging and support the transition from more polluting vehicles to EVs. Continue the promotion of alternative cleaner vehicles for freight and servicing, in line with our Cargo Bike action plan (2023).
People			
Crime reduction and safety	Neutral impact on crime and fear of crime. Minor positive impact on road safety in the CCZ due to reductions in traffic. Black, Asian and minority ethnic people, disabled people, older people and children may disproportionately benefit from minor improvements in road safety, as they are at greater risk from road collisions in London.	+1 Minor positive	To help ensure that public transport is a safe alternative mode for people who switch modes and have a fear of crime or harassment, it is recommended that we continue to reduce the risk and increase public awareness of how to act in the event of crime or harassment on our network through marketing campaigns and ensure that our network staff are trained to effectively deal with instances of crime and harassment. In addition to further improving safety and security measures across our network through measures such as improved lighting and enhanced CCTV coverage. To help ensure that improvements in road safety are realised and enhanced, it is recommended that we continue to seek opportunities to increase the attractiveness of cycling and walking and bus to promote use and reliability of these modes where appropriate, and further increase potential for people to

Topic	Description of Impacts	Impact rating	Proposed mitigations and enhancements
			travel using active modes in a safe environment. It is also recommended that we ensure there is awareness of the changes to the Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent Discount for back to base car club EVs based in bays in the CCZ, if our recommended modifications are approved.
Accessibility, connectivity and social integration	Minor positive impact on travel by active and sustainable modes. Minor negative impact on charities and community groups, and on access to community groups, with the following groups being disproportionately impacted: Disabled people, Young People, Older People, Homeless People, Asylum Seekers and Refugees, People on Low Incomes. Minor negative impact on access to religious services, with the following groups being disproportionately impacted: Religious people, Disabled people, Young People, Older People, People on Low Incomes. Neutral impact on access to education.	-1 Minor negative	It is recommended that we continue to seek opportunities to increase the attractiveness of cycling and walking and bus to promote use of these modes, and further increase potential for people to travel using reliable public transport, and active modes in a safe environment. It is recommended we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on private vehicle use including our discounts available for vehicles with nine+ seats, the 100 per cent Blue Badge discount and our Dial-a-Ride service in addition to the Taxicard scheme. It is also recommended that we ensure there is awareness of the proposed changes to the Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the CCZ, if our recommended modifications are approved.
Health and health inequalities	Minor positive impact on mental and physical health due to positive changes in traffic levels, and air quality, disproportionately positively impacting older people, younger people, disabled people, people from Black, Asian and minority ethnic backgrounds, and people on low incomes. Neutral impact on noise. Neutral impact on access to health and social care facilities.	0 Neutral	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on travel by private vehicle to access or provide health and social care including the 100 per cent Blue Badge holder discount, and the NHS patient reimbursement scheme.

Topic	Description of Impacts	Impact rating	Proposed mitigations and enhancements
	Minor negative impact on access to residential, informal and domestic care provision, disproportionately negatively impacting older people, and disabled people.		
Access to jobs and training	Minor negative impact on carers on low incomes providing services to vulnerable groups by private vehicle, where charge is not covered by their employer or providing informal care due to the proposed charge level increase. Potential disproportionate negative impact on Black, Asian and minority ethnic women due to the demographics of the industry. The impact on carers may lead to minor indirect negative impacts on disabled people and older people reliant on formal and informal care provision. Neutral impact on access work or training for people who face barriers to travel by public transport or active travel. Neutral impact on NHS workers. Minor negative impact on low-income workers or private hire vehicle (PHV) drivers that require to travel to work in the CCZ during charging hours who do not qualify for the proposed new CVD, and the charge is not passed on to the customer or covered by the operator/employer, due to the proposed charge level increase. This impact is considered minor due to the small proportion of workers operating primarily in the CCZ unable to pass on the charge or have it covered by their employer. Potential disproportionate negative impact on Black, Asian and minority ethnic and Muslim men due to the demographics of the PHV	-1 Minor negative	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for carers and care workers (including PAs), including our discounts available for vehicles with nine+ seats and the 100 per cent Blue Badge discount and ensure that our NHS staff and patient reimbursement scheme continues to be available for those who may require use of it. It is also recommended that we ensure there is awareness of the proposed changes to Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the CCZ, if our recommended modifications are approved.

Topic	Description of Impacts	Impact rating	Proposed mitigations and enhancements
	industry in London. The impact on PHV drivers may lead to minor indirect negative impacts on disabled people and older people reliant on PHVs for door-to-door transport.		
Protected characteristics and disadvantaged groups	While the proposed new CVD will provide a benefit for those with EVs compared to a do-nothing scenario, the proposed charge level increase may have a disproportionate negative impact on people on low incomes without an EV required to drive in the CCZ, particularly for those less able to use alternative modes to travel, including carers and PHV drivers. Due to the demographics of these sectors, it may lead to secondary negative impacts on Black, Asian and minority ethnic women (carers) and Black, Asian and minority ethnic Muslim men (PHV drivers). This may also have a minor disproportionate negative impact on older people, disabled people and people from certain Black, Asian and minority ethnic groups who are more likely to be on low incomes. Disproportionate negative impact on people on low incomes due to the proposed changes to the Residents' Discount, due to the barriers to ownership of an EV people on low incomes may face. This may also have a minor disproportionate negative impact on older people, disabled people and people from certain Black, Asian and minority ethnic groups who are more likely to be on low incomes. Minor positive impacts on traffic levels and subsequently road safety and air quality. Older people, younger people, disabled people, people	0 Neutral	It is recommended that we continue to proactively promote our existing discounts, exemptions and reimbursements which may be available for people who may be reliant on travel by private vehicle to access or provide health and social care including the 100 per cent Blue Badge discount, and the NHS staff and patient reimbursement scheme. It is also recommended that we ensure there is awareness of the proposed changes to the Residents' Discount eligibility from 2027 to 2030, and the new 100 per cent discount for back to base car club EVs based in bays in the CCZ, if our recommended modifications are approved.

Topic	Description of Impacts	Impact rating	Proposed mitigations and enhancements
	from Black, Asian and minority ethnic backgrounds, and people on low incomes may experience a disproportionate positive impact from minor positive impacts on traffic levels and subsequently road safety and air quality.		

12 Monitoring and Evaluation

Proposal 20 of the MTS commits us to keep Road User Charging schemes under review to ensure their effectiveness in achieving the MTS policies and proposals. This includes monitoring of CCZ changes, meaning there are already processes in place for the monitoring and evaluation of the impact of the Proposed Changes if taken forward.

This IIA was published in draft as part of the Public Consultation on the Proposed Changes. Following consultation, responses from the public, stakeholders and consultees were reviewed and the proposals revisited to ensure that any further potential impacts identified during consultation and engagement were assessed where required and, where considered necessary, further mitigations, enhancements or amendments considered. As a result of our post-consultation review, we have recommended two modifications to the proposals, including a 100 per cent discount for car club EVs based in bays in the Residents' Discount zone, and an extension of the current vehicle eligibility criteria for residents on low incomes and in receipt of certain benefits until March 2030.

D – Code frames used by AECOM in analysing the responses

Code Number	Theme and issue raised	Coder guidance
	General comments	
1	Support/agree with the package of proposed changes (general comment)	Use this code for general comments about supporting and agreeing with the proposed changes but don't specifically say what they agree with or why. If the respondent only talks about supporting specific elements but not all of the proposed changes, do not use this code
2	Oppose/disagree with the package of proposed changes (general comment)	Use this code for general comments about opposing and disagreeing with the proposed changes but don't specifically say what they disagree with or why. If the respondent only talks about opposing specific elements but not all of the proposed changes, do not use this code
3	Support/agree with the Congestion Charge/positive comment about it (general comment)	
4	Oppose/disagree with the Congestion Charge/is not necessary/suggest it should be abolished	
5	Oppose/disagree with the Congestion Charge as it is just another tax/money-making scheme	
6	Suggest package of proposals should go further (general comment)	Use this code for general comments. If the comment can be captured more specifically with other codes, use those instead
7	Support/agree car/vehicle use needs to be reduced further/discouraged (general comment)	Use this code for general comments. If the comment can be captured more specifically with other codes, use those instead
8	Concern that the package of proposed changes will penalise drivers/motorists (general comments)	Use this code for general comments about the proposed changes being unfair to drivers/motorists and penalising them
	Proposed charge increase	
20	Support/agree with the proposed increase to the charge level (£15 to £18)	Use this code for responses that specifically say they support/agree with the proposed increase to the charge level, increasing from £15 to £18 (and £17.50 to £21 for those paying three days after travel)
21	Suggest charge should be higher than £18/higher in general	Use this code for responses that suggest the charge should be higher than £18 or just say it should be higher but don't refer to anything more specific
22	Suggest charge should be higher than £15 but less than £18	
23	Oppose/disagree with the proposed increase to the charge level (£15 to £18)	
24	Suggest charge should be lower/is already expensive (general comments)	

Code Number	Theme and issue raised	Coder guidance
	Charge levels	
40	Suggest further increases to the charge level over time/how increases should be calculated	If the comment suggests/agrees to increases being calculated and applied without consultation, use code 213 instead
41	Concern about further increases to the charge level over time/how increases will be calculated	If the comment refers to how increases are calculated and applied without consultation, use code 214 instead
42	Suggest charge should be lower for business/commercial/freight vehicles	
43	Suggest charges should be higher for other specified types of vehicles/people	If you use this code, please write the paraphrased comment in the coding sheet
44	Suggest charges should be lower for other specified types of vehicles/people	If you use this code, please write the paraphrased comment in the coding sheet
45	Suggest charges should be higher for motorbikes/to not be exempt	
	Charging period	
60	Suggest charging period/hours should be extended (general comments)	
61	Suggest charging period/hours should be reduced (general comments)	
62	Suggest charging period should apply 24/7/all the time	
63	Suggest charging period should only apply during peak times/when congestion is worst	
64	Other comment/suggestion for charging period/days/times for Congestion Charge	If you use this code, please write the paraphrased comment in the coding sheet
65	Congestion charge should be removed / there should be no charge at weekends	
	Congestion Charge zone	
80	Suggest extending the Congestion Charge zone/increase the boundary	
81	Suggest reducing the Congestion Charge zone/decrease the boundary	
82	Concern about confusion whether have travelled in the Congestion Charge zone/should have a way to check	Use this code for comments sharing concern about people travelling in the Congestion Charge zone without being aware, as well as those wanting to be able to check if they have entered the zone and will need to pay a charge (e.g. an online tool to check this)
83	Other comment/suggestion on the Congestion Charge zone/boundary	If you use this code, please write the paraphrased comment in the coding sheet
	Cleaner Vehicle Discount (CVD)	
100	Support/agree with new proposed Cleaner Vehicle Discount/providing a discount lower than 100% for EVs (general comment)	Use this code for comments generally supporting the proposed changes to the Cleaner Vehicle Discount or supporting the proposal to reduce the discounts for

Code Number	Theme and issue raised	Coder guidance
		electric vehicles from 100% in January 2026
101	Oppose/disagree with new proposed Cleaner Vehicle Discount/providing a discount lower than 100% for EVs (general comment)	Use this code for comments generally opposing the proposed changes to the Cleaner Vehicle Discount or opposing the proposal to reduce the discounts for electric vehicles from 100% in January 2026
102	Suggest extending the 100% discount for all electric vehicles	Use this code for comments suggesting the 100% discount should continue for all electric vehicles (as the current discount provides)
103	Suggest a higher discount for electric vans, HGVs, quadricycles (i.e. higher than 50%)	
104	Suggest a lower discount for electric vans, HGVs, quadricycles (i.e. lower than 50%)	
105	Suggest no discount for electric vans, HGVs, quadricycles	
106	Suggest a higher discount for electric cars (i.e. higher than 25%)	If the comment suggests providing 100% discount to electric cars, use code 102 instead
107	Suggest a lower discount for electric cars (i.e. lower than 25%)	
108	Suggest no discount for electric cars (e.g. they still contribute to congestion/traffic levels so shouldn't be discounted)	
109	Suggest Cleaner Vehicle Discount should be higher for electric car clubs/car-sharing	
110	Suggest Cleaner Vehicle Discount should be higher for electric PHVs	
111	Suggest Cleaner Vehicle Discount should be higher for electric business/commercial/freight vehicles	
112	Suggest Cleaner Vehicle Discount should be higher for electric vehicles of small businesses/sole traders/tradespeople	
113	Concern that the proposed changes to the Cleaner Vehicle Discount will reduce the number of people upgrading to electric vehicles	
114	Concern that the proposed changes to the Cleaner Vehicle Discount will have a negative financial impact on those who do not have off-street parking/are facing parking charge increases	
115	Concern about proposed changes to the Cleaner Vehicle Discount on those who upgraded/invested in electric vehicles (e.g. those who upgraded to receive the 100% discount)	
116	Other comment/suggestion about the Cleaner Vehicle Discount	If you use this code, please write the paraphrased comment in the coding sheet

Code Number	Theme and issue raised	Coder guidance
117	Eligibility for CVD should be based on vehicle size, weight, emissions etc	
	Auto Pay	
130	Oppose/disagree with Cleaner Vehicle Discount only applying to those registered with Auto Pay	
131	Other comment/suggestion about Auto Pay	If you use this code, please write the paraphrased comment in the coding sheet
	Residents' discount	
140	Suggest there should not be a residents' discount	
141	Concern that continuing to provide residents' discount will not reduce congestion/discourage car use	Use this code for comments about the residents' discount not helping to reduce congestion or discourage car use. Also use it for comments saying that not implementing the changes for new applicants until March 2027 will allow people to buy more non-EVs up until then
142	Suggest residents' discount should be higher (i.e. higher than 90%)/residents should be exempt	Use this code for general comments suggesting the residents' discount should be higher or higher than 90%. If the comment is more specifically about the discount percentage for new applicants after March 2027, use code 147
143	Suggest residents' discount should be lower (i.e. lower than 90%)	Use this code for general comments suggesting the residents' discount should be lower or lower than 90%. If the comment is more specifically about the discount percentage for new applicants after March 2027, use code 148
144	Suggest residents' discount should only be provided for those with electric vehicles (general comment)	
145	Support/agree with the proposed residents' discount for new applicants (i.e. applying to only electric vehicles from March 2027 for new applicants)	
146	Oppose/disagree with the proposed residents' discount for new applicants only applying to electric vehicles/should continue to provide it for all types of vehicles	
147	Suggest residents' discount should be higher for electric vehicles/new applicants (i.e. higher than 90%)	
148	Suggest residents' discount should be lower for electric vehicles/new applicants (i.e. lower than 90%)	
149	Concern about the lack of affordable electric vehicles/concerns about performance/ sufficient charging infrastructure	

Code Number	Theme and issue raised	Coder guidance
150	Suggest phasing out the residents' discount over time	
151	Concern/queries about how the residents' discount will work/how it will be applied	
152	Other comment/suggestion for residents' discount/for new applicants	If you use this code, please write the paraphrased comment in the coding sheet
153	Concern residents' discount will impact desirability of living in central London/dissuade people from buying / impact property prices'	
	Other discounts	
170	Suggest there should be no discounts for anyone	
171	Suggest discount for blue badge holders should continue	Blue badge holders already qualify for a 100% discount, so use this code for comments suggesting this continues
172	Suggest there should be a discount for other people with health issues/disabilities (i.e. in addition to blue badge holders)	
173	Suggest there should be a discount for other specified users/groups	If you use this code, please write the paraphrased comment in the coding sheet
	Exemptions	
190	Support/agree with taxis (black cabs) being exempt from charges/should not be charged	
191	Suggest taxis (black cabs) should not be exempt from charges/should be charged	
192	Suggest PHVs should be exempt from charges/should not be charged (non-electric vehicles and general comment)	If the comment suggests exemptions for electric PHVs, use code 110 instead
193	Support/agree with PHVs not being exempt from charges/should be charged	
194	Suggest taxis/PHVs (cannot determine which) should be exempt from charges/should not be charged	Use codes 190-193 and 110 where possible instead of this based on the comment. Black cabs are currently exempt, but PHVs are not exempt
195	Suggest taxis/PHVs (cannot determine which) should not be exempt/should be charged	Use codes 190-193 and 110 where possible instead of this based on the comment. Black cabs are currently exempt, but PHVs are not exempt
196	Suggest there should be exemptions/no charge for other specified types of vehicles/people	If you use this code, please write the paraphrased comment in the coding sheet
	Mayoral guidance on TfL's exercise of road user charging functions	
210	Support/agree with allowing changes to be made to schemes without consultation (general comment)	
211	Oppose/disagree with allowing changes to be made to schemes without consultation/concern about accountability/transparency/suggest all	

Code Number	Theme and issue raised	Coder guidance
	changes should be consulted on (general comment)	
212	Support/agree with allowing increases to charge levels without consultation (based on Tube/TfL railway fares/annual inflation)	
213	Oppose/disagree with allowing increases to charge levels without consultation (based on Tube/TfL railway fares/annual inflation)	
214	Support/agree with allowing procedural/administrative changes to be made to schemes without consultation	
215	Oppose/disagree with allowing procedural/administrative changes to be made to schemes without consultation	
217	Comment about the proposed change to minimum consultation periods/time frames	If you use this code, please write the paraphrased comment in the coding sheet
218	Other comment/suggestion about mayoral guidance	If you use this code, please write the paraphrased comment in the coding sheet
	Active travel and public transport	
230	Package of proposed changes will positively impact/cause an increase in active travel (e.g. walking, cycling etc)	Use this code for comments about the proposed changes causing an increase in active travel or positively impacting it in any way. If appropriate, make sure to also use relevant impact codes (e.g. if they say it will improve the safety of cycling, use code 340 too)
231	Suggest more encouragement/investment in active travel (walking, cycling, infrastructure, pedestrianisation)	Use this code for any comments about there needing to be more encouragement/investment in active travel
232	Suggest more enforcement of poor cyclist behaviour	
233	Package of proposed changes will positively impact/cause an increase in public transport use (e.g. bus, Tube, train etc)	Use this code for comments about the proposed changes causing an increase in public transport use or positively impacting it in any way. If appropriate, make sure to also use relevant impact codes (e.g. if they say it will improve the safety of buses, use code 340 too)
234	Suggest more encouragement/investment in public transport (e.g. more affordable, more frequent, reliable, network coverage, safety improvements etc)	Use this code for any comments about there needing to be more encouragement/investment in public transport
	Road user charging	
250	Suggest Congestion Charge should focus on congestion/traffic reduction rather than air quality/pollution/emissions (e.g. ULEZ should focus on air quality/pollution/emissions)	Use this code for comments saying the Congestion Charge should focus on congestion/traffic reduction rather than air quality/pollution/emissions which is what the ULEZ should focus on, as well as comments showing concern that the focus of the Congestion Charge has changed

Code Number	Theme and issue raised	Coder guidance
251	Other comment/suggestions about existing ULEZ	
252	Suggest another way for applying the Congestion Charge/road user charging (e.g. dependent on vehicle size, weight, distance travelled, emissions)	If you use this code, please write the paraphrased comment in the coding sheet
253	Other comment/suggestion about the Congestion Charge	If you use this code, please write the paraphrased comment in the coding sheet
Financial impacts		
270	Concern package of proposed changes will have negative impact on local residents	
271	Concern package of proposed changes will have a negative impact on my business/livelihood	Use this code for comments from people referring to their own business/livelihood and feeling the proposed changes will have a negative impact
272	Concern package of proposed changes will have a negative impact on small businesses/sole traders/tradespeople	Use this code for comments about the proposed changes having a negative impact on small businesses. If the respondent is referring more specifically to their own business or businesses in general, use codes 271 or 273 instead
273	Concern package of proposed changes will have negative impact on businesses/operations in London (general comments)	Use this code for comments about the proposed changes having a negative impact on businesses. If the respondent is referring more specifically to their own business or small businesses, use codes 271 or 272 instead. If talking about the impact on London's economy more widely/generally, use code 244 instead
274	Concern package of proposed changes will have negative impact on London's economy/tourism/number of visitors	Use this code for comments about the proposed changes having a negative impact on London's economy more widely/generally or tourism/visitors to London. If the respondent is referring specifically to their own businesses or businesses more generally, check codes 271-273 instead
275	Concern that Congestion Charge costs will be/are being passed onto residents/customers from businesses/services (e.g. through taxi fares, cost of goods)	Use this code for any comments/concerns about the Congestion Charge costs being passed onto residents/customers from businesses/services (e.g. taxi fares increasing, delivery costs from businesses increasing)
276	Concern about the cumulative financial impact of charges/charge increases from multiple schemes (e.g. ULEZ, Silvertown and Blackwall Tunnels, other crossings and schemes)	
277	Concern about proposed increase to charge level/changes to discounts during cost of living crisis/pressures	

Code Number	Theme and issue raised	Coder guidance
278	Concern package of proposed changes will have negative impact on those struggling financially/on lower incomes/essential/key workers (e.g. debt)	Use this code for general comments about how the proposed changes will negatively impact those struggling financially/on lower incomes, including essential/key workers. If the comment is more specific about the increase in charge level or changes to the Cleaner Vehicle Discount or residents' discount, use codes 279 and/or 280 instead
279	Concern proposed increase to charge level will have negative impact on those struggling financially/on lower incomes/essential/key workers (e.g. debt)	Use this code for comments about the increase in charge level (£15 being increased to £18) negatively impacting those struggling financially/on lower incomes
280	Concern proposed changes to discounts will have negative impact on those struggling financially/on lower incomes/essential/key workers (e.g. debt)	Use this code for comments about the changes to either the Cleaner Vehicle Discount (providing a discount lower than 100% for electric vehicles from Jan 2026) or residents' discount (90% discount for residents inside the Congestion Charge zone only applying to electric vehicles from March 2027) negatively impacting those struggling financially/on lower incomes
	Social impacts	
300	Concern package of proposed changes will negatively impact on social/leisure activities	Use this code for comments about the proposed changes negatively impacting on people's social and leisure activities
301	Concern package of proposed changes will negatively impact on faith groups (e.g. travelling to church) (general comment)	Use this code for general comments about how the proposed changes will negatively impact faith groups/those travelling for religious purposes, including essential/key workers. If the comment is more specific about the increase in charge level or changes to the Cleaner Vehicle Discount or residents' discount, use codes 302 and/or 303 instead
302	Concern proposed increase to charge level will negatively impact on faith groups (e.g. travelling to church) (general comment)	Use this code for comments about the increase in charge level (£15 being increased to £18) negatively impacting faith groups/those travelling for religious purposes
303	Concern proposed changes to discounts will negatively impact on faith groups (e.g. travelling to church) (general comment)	Use this code for comments about the changes to either the Cleaner Vehicle Discount (providing a discount lower than 100% for electric vehicles from Jan 2026) or residents' discount (90% discount for residents inside the Congestion Charge zone only applying to electric vehicles from March 2027) negatively impacting faith groups/those travelling for religious purposes
304	Concern package of proposed changes will negatively impact disabled people (general comment)	Use this code for general comments about how the proposed changes will negatively impact people with disabilities, including

Code Number	Theme and issue raised	Coder guidance
		essential/key workers. If the comment is more specific about the increase in charge level or changes to the Cleaner Vehicle Discount or residents' discount, use codes 305 and/or 306 instead
305	Concern proposed increase to charge level will negatively impact disabled people (general comment)	Use this code for comments about the increase in charge level (£15 being increased to £18) negatively impacting people with disabilities
306	Concern proposed changes to discounts will negatively impact disabled people (general comment)	Use this code for comments about the changes to either the Cleaner Vehicle Discount (providing a discount lower than 100% for electric vehicles from Jan 2026) or residents' discount (90% discount for residents inside the Congestion Charge zone only applying to electric vehicles from March 2027) negatively impacting people with disabilities
307	Concern package of proposed changes will negatively impact elderly people (general comment)	Use this code for general comments about how the proposed changes will negatively impact elderly people, including essential/key workers. If the comment is more specific about the increase in charge level or changes to the Cleaner Vehicle Discount or residents' discount, use codes 308 and/or 309 instead
308	Concern proposed increase to charge level will negatively impact elderly people (general comment)	Use this code for comments about the increase in charge level (£15 being increased to £18) negatively impacting elderly people
309	Concern proposed changes to discounts will negatively impact elderly people (general comment)	Use this code for comments about the changes to either the Cleaner Vehicle Discount (providing a discount lower than 100% for electric vehicles from Jan 2026) or residents' discount (90% discount for residents inside the Congestion Charge zone only applying to electric vehicles from March 2027) negatively impacting elderly people
310	Concern package of proposed changes will negatively impact vulnerable people (general comment)	Use this code for general comments about how the proposed changes will negatively impact vulnerable people (unclear whether referring to disabled or elderly), including essential/key workers. If the comment is more specific about the increase in charge level or changes to the Cleaner Vehicle Discount or residents' discount, use codes 311 and/or 312 instead
311	Concern proposed increase to charge level will negatively impact vulnerable people (general comment)	Use this code for comments about the increase in charge level (£15 being increased to £18) negatively impacting vulnerable people (unclear whether referring to disabled or elderly)

Code Number	Theme and issue raised	Coder guidance
312	Concern proposed changes to discounts will negatively impact vulnerable people (general comment)	Use this code for comments about the changes to either the Cleaner Vehicle Discount (providing a discount lower than 100% for electric vehicles from Jan 2026) or residents' discount (90% discount for residents inside the Congestion Charge zone only applying to electric vehicles from March 2027) negatively impacting vulnerable people (unclear whether referring to disabled or elderly)
313	Concern package of proposed changes will have a negative impact on those with protected characteristics (not captured elsewhere in codeframe) (general comment)	Use this code for general comments about how the proposed changes will negatively impact those with protected characteristics not captured elsewhere in the codeframe (e.g. gender, ethnicity, pregnant people), including essential/key workers. If the comment is more specific about the increase in charge level or changes to the Cleaner Vehicle Discount or residents' discount, use codes 314 and/or 315 instead
314	Concern proposed increase to charge level will have a negative impact on those with protected characteristics (not captured elsewhere in codeframe) (general comment)	Use this code for comments about the increase in charge level (£15 being increased to £18) negatively impacting those with protected characteristics not captured elsewhere in the codeframe (e.g. gender, ethnicity, pregnant people)
315	Concern proposed changes to discounts will have a negative impact on those with protected characteristics (not captured elsewhere in codeframe) (general comment)	Use this code for comments about the changes to either the Cleaner Vehicle Discount (providing a discount lower than 100% for electric vehicles from Jan 2026) or residents' discount (90% discount for residents inside the Congestion Charge zone only applying to electric vehicles from March 2027) negatively impacting those with protected characteristics not captured elsewhere in the codeframe (e.g. gender, ethnicity, pregnant people)
316	Package of proposed changes will have a positive impact on those with protected characteristics	If you use this code, please write the paraphrased comment in the coding sheet
317	Concern package of proposed changes will have other social impact (e.g. impact on charities / charity work)	If you use this code, please write the paraphrased comment in the coding sheet
Other impacts		
330	Package of proposed changes will have no impact to congestion/traffic levels/will not cause a reduction in the number of people travelling within the Congestion Charge zone	
331	Package of proposed changes will have a positive impact on congestion/traffic levels/will reduce the number of people travelling within the Congestion Charge zone	

Code Number	Theme and issue raised	Coder guidance
332	Package of proposed changes will cause more congestion/traffic levels/increase it	
333	Package of proposed changes will have no impact to air quality/emissions	
334	Package of proposed changes will have a positive impact on air quality/emissions/will improve it	
335	Package of proposed changes will make air quality/emissions/pollution worse	
336	Package of proposed changes will have no impact to noise pollution	
337	Proposed changed will have a positive impact on noise pollution/reduce it	
338	Package of proposed changes will make noise pollution worse/create more noise	
339	Package of proposed changes will have no impact to safety	
340	Proposed changed will have a positive impact on safety issues/improve safety	
341	Package of proposed changes will make safety issues worse	
342	Concern Congestion Charge just pushes/will just push congestion and pollution outside of the zone	Use this code for comments about the Congestion Charge resulting in congestion/pollution issues being moved/pushed to areas outside of the Congestion Charge zone/nearby areas
343	Concern Congestion Charge will push people out of London/cause people to move away/relocate	Use this code for comments/concerns about the Congestion Charge causing residents/people to relocate/move out of London
344	Concern about negative impact of electric vehicles on congestion/air quality/emissions	
345	Concern about the impact on those who can't use public transport/active travel/are reliant on using cars/taxis (e.g. for work, due to health issues/disabilities, public transport not viable)	
346	Concern proposed changes will encourage use of petrol/diesel cars / slow down transition to EVs	
347	Suggestion about vehicle type e.g. tram-style/double decker electric/new routemasters/zero-emission buses/vehicle accessibility	Use for Routemaster campaign only
Alternative mitigating suggestions		
360	Suggest more incentives for upgrading to electric vehicles (not captured elsewhere in codeframe)	
361	Concern reduction in road space causes congestion (e.g. bus lanes, cycle lanes, Low Traffic Neighbourhoods (LTNs))	

Code Number	Theme and issue raised	Coder guidance
362	Suggest reducing/improving traffic calming measures/traffic light timings	
363	Suggest increasing/improve green spaces	
364	Suggest removing bus lanes/cycle lanes/increasing road space for cars/vehicles	
365	Other specific suggestion to reduce congestion/pollution (e.g. needs to be more encouragement/investment in other green initiatives)	If you use this code, please write the paraphrased comment in the coding sheet
	Other comments	
600	Supportive/positive comment about the Mayor/Government/TfL	Use this code for supportive comments about the Mayor of London (Sadiq Khan)/the Government/Transport for London (TfL)
601	Criticism/negative comment about the Mayor/Government/TfL	Use this code for criticism about the Mayor of London (Sadiq Khan)/the Government/Transport for London (TfL)
602	More information/clarity needed/unable to find appropriate information to be able to comment	
603	Query about how funds raised through Congestion Charge/other charging schemes are used	
604	Unclear comment/unsure what referring to	
605	Comment/comparison to other country/city	
606	Reference to people with protected characteristics (e.g. age, disability, gender, ethnicity, religion)	If you use this code, please write the paraphrased comment and type of characteristic in the coding sheet
607	Don't know/unsure/no opinion/unable to comment	
700	Out of scope comment/unrelated to proposals and not captured elsewhere	If you use this code, please write the paraphrased comment in the coding sheet
800	Other (does not fit into codeframe)	If you use this code, please write the paraphrased comment in the coding sheet
900	No comment/response	

Appendix E – Consultation analysis report (by AECOM)

Congestion Charging

Consultation Analysis

Transport for London

October 2025

Quality information

Prepared by	Checked by	Verified by	Approved by
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Table of Contents

1	Introduction
1.1	Overview of the consultation
1.2	The consultation
1.3	Questionnaire
1.4	Format of report
2	Methodology
2.1	Receiving responses
2.2	Campaigns
2.3	Thematic coding
2.4	Analysis and reporting
2.5	Response
2.5.1	Type of respondent
2.5.2	Respondent profile
2.5.3	Respondent location
3	Travel perceptions
3.1	Importance of reducing traffic and congestion in Central London
3.2	Importance of encouraging the use of zero emission vehicles in Central London
4	Travel behaviours
4.1	Driving behaviours in central London
4.2	Congestion Charge discounts, exemption and reimbursements
4.3	Frequency of driving in the Congestion Charge Zone
4.4	Auto Pay Accounts
5	Impact of Proposals
5.1	Effectiveness of proposals in achieving TfL's aims to manage traffic and congestion in central London
5.2	Impact of proposals on travel within the CCZ
5.3	Proposals which would likely reduce or prevent travel into or within the CCZ
5.4	Impact of proposals on future vehicle purchase
6	Free text comments on the proposed changes to the congestion charge
6.1	Main comments given about the proposed changes to the congestion charge
7	About the consultation
7.1	How respondents heard about the consultation
7.2	Experience of participating in the consultation
7.3	Free text comments on how to improve consultation service
	Appendix A Questionnaire
	Appendix B Campaign responses
	Appendix C Coding table

Appendix D Stakeholder responses

Appendix E About the consultation – main comments by sub-theme

Chapter 2 Figures

Figure 2-1 Type of respondent (%)

Figure 2-2 Respondent location map

Figure 3-1 Importance of TfL taking steps to reduce traffic and congestion in central London (%)

Figure 3-2 Importance of TfL taking steps to encourage use of zero emission vehicles in central London (%)

Figure 4-1 Driving in central London (%)

Figure 4-2 Vehicle type driven (%)

Figure 4-3 Registered for a discount, exemption or have a reimbursement arrangement (%)

Figure 4-4 Discount / Reimbursement type (%)

Figure 4-5 Frequency of driving in the Congestion Charge Zone (%)

Figure 5-1 Effectiveness of proposals in achieving TfL aims to manage traffic and congestion in central London (%)

Figure 5-2 Proposals which would likely reduce or prevent travel into or within the CCZ (%)

Figure 5-3 Impact of proposals on future vehicle purchase (%)

Figure 7-1 How respondents heard about the consultation (%)

Figure 7-2 Experience of participating in the consultation (%)

Chapter 3 Tables

Table 2-1 Respondent age, gender and ethnicity (%)

Table 4-1 Auto Pay account

Table 5-1 Impact of proposals on travel within the CCZ?

Table 6-1 Comments on the proposals (N)

Table 7-1 Comments on how to improve the consultation service (N)

1. Introduction

1.1 Overview of the consultation

The Congestion Charging scheme was introduced in February 2003. The main aim of the scheme is to manage traffic and congestion in central London by imposing a charge during the busiest times of day.

TfL are now proposing changes to the Congestion Charging scheme. The proposals are made up of three parts:

- **Proposal A:** Increasing the Congestion Charge from £15 to £18 so it remains effective in managing traffic and congestion and retains its deterrent effect.
- **Proposal B:** New Cleaner Vehicle Discount (CVD) for electric vehicles whereby the discount varies by vehicle type. While the current CVD will end in December 2025, offering a new discount which will provide long term targeted support for electric vehicles will bring more of the benefits of electrification, including reduced carbon emissions and improved air quality in central London.
- **Proposal C:** A change to the Residents' Discount for new applicants to extend the incentivising effect of the CVD to residents

In addition to the three proposals outlined above, TfL, on behalf of the Mayor, are also consulting on proposed changes to the Mayoral Guidance on the exercise of TfL's road user charging powers. The changes would better reflect the approach TfL follows when undertaking consultations in comparable circumstances and when setting charges for TfL services, notably public passenger transport fares.

1.2 The consultation

TfL held a public and stakeholder consultation over eleven weeks from 27th May to 11th August 2025 to seek views on proposed changes to the London Congestion Charging scheme. There were 4,561 responses over this period.

TfL have commissioned AECOM, an independent consultancy, to impartially analyse and report on responses from the consultation.

1.3 Questionnaire

TfL designed and hosted the questionnaire on Have your say, the TfL consultation portal. The questionnaire included 21 closed questions which asked about the respondents' profile and views on the proposals. The consultation incorporated a single open question to gather feedback on respondents' views towards the proposals and proposed changes to the Mayoral Guidance, and another open question was asked about the quality of the consultation.

A copy of the questionnaire can be found in **Appendix A**.

1.4 Format of report

Following this introduction:

Chapter 2: describes the methodology used;

Chapter 3: details key information on travel perceptions;

Chapter 4: details key information on travel behaviours of respondents;

Chapter 5: details key information on the impact of the proposals;

Chapter 6: details respondents' free text comments on the proposals; and

Chapter 7: details respondent views on the consultation.

2. Methodology

2.1 Receiving responses

Most responses were received via the consultation questionnaire hosted on the TfL portal. To ensure inclusivity, TfL also gathered responses via email. An “easy read” version of the questionnaire was also available, but the questions were the same in both the standard and “easy read” versions. TfL also provided the option for respondents to submit a “quick response” instead of completing the full survey, just asking a single question to gain their thoughts on the proposals.

TfL entered all responses received by methods other than the online questionnaire into the TfL portal. The database was delivered to AECOM in weekly batches for processing, analysis, and reporting.

2.2 Campaigns

When analysing the responses, it is apparent there have been two campaigns. The campaigns identified were:

- **Zipcar:** a total of 42 responses were received, and it appears Zipcar’s standard response text was shared with others for use as their own response to the main open question in the survey. Some respondents only responded with the standard text, whilst others also added their own additional comments to the standard text; and
- **Routemaster buses:** a total of 152 responses were received.

Respondents were able to change the text or answers offered as standard before submitting for both campaigns, so additional codes were provided for these responses as appropriate.

The standard responses provided by these campaigns are shown in Appendix B, as well as further information about the responses.

2.3 Thematic coding

All free text responses and emails were grouped into themes to allow meaningful analysis. Letter and email responses were combined with the free text comments given in the questionnaire for analysis purposes. The full coding tables can be seen in Appendix C.

Where possible, free text responses have been analysed by topic rather than response to a question to allow meaningful analysis and avoid double counting where respondents have given the same response to both the main open question and that asking about the quality of the consultation.

The themes from each question were created by AECOM using the initial set of responses, and these were verified by TfL before full coding began. Where new themes emerged, these were verified and confirmed with TfL before continuing. A minimum of 10 per cent quality assurance checks and validation were completed on the coding for each question by both AECOM and TfL.

2.4 Analysis and reporting

The consultation was open to all and, therefore, respondents were self-selecting. This, coupled with the fact respondents could choose which of the questions they answered, means the results and responses should be viewed as indicative of the wider population and any identified sub-groups rather than representative. The profile of respondents is detailed in Section 2.5.

As respondents were not obliged to answer all questions in the questionnaire, the percentages shown only include those that responded to each question. The number of people who answered each question is shown as “n=”.

Where percentages do not sum to 100 per cent in the main body of the report, this is due to rounding or where more than one response was permitted.

Statistical significance testing was completed. Where results are reported as different between sub-samples, this means the differences are statistically significantly different. Only data which is significantly different has been referenced in the report.

A large volume of data was received and, therefore, the following chapters summarise the main findings and highlight pertinent differences between groups.

2.5 Response

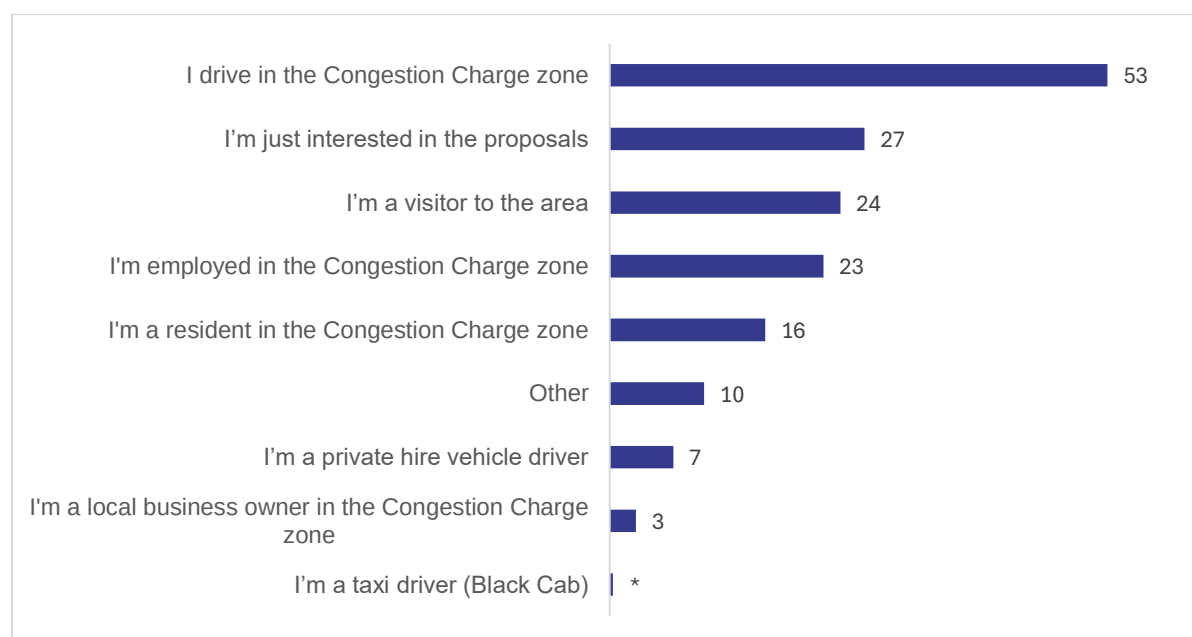
2.5.1 Type of respondent

A total of 4,561 responses were received, of which 1,245 were quick responses. TfL categorised 99 responses as being from stakeholders. The total number of responses not including stakeholders is 4,462.

Of the 4,561 responses, 194 were identified as campaign responses.

The types of respondents who answered the survey is shown in Figure 2-1.

Figure 2-1 Reason for completing the survey (%)



Base: 3,174. Question: What encouraged you to complete this questionnaire? 'I'm interested in the proposals because...'

**Responses less than 1%. Respondents were able to select more than one response and therefore overall responses >100%*

Of the 4,561 total responses received, 3,938 respondents provided a written comment to at least one of the open questions in the survey. For the issues commonly raised throughout the report, the percentages are of respondents who provided a comment to the open question being discussed.

A list of the 99 stakeholders who responded to the consultation is provided in Appendix D.

2.5.2 Respondent profile

Respondents provided details about themselves such as age, gender, and ethnic group. These questions were optional. The percentages in Error! Reference source not found. are of those who provided this information, not all respondents provided this information therefore any difference in response by demographic profile should be treated with caution.

Table 2-1 Respondent age, gender and ethnicity (%)

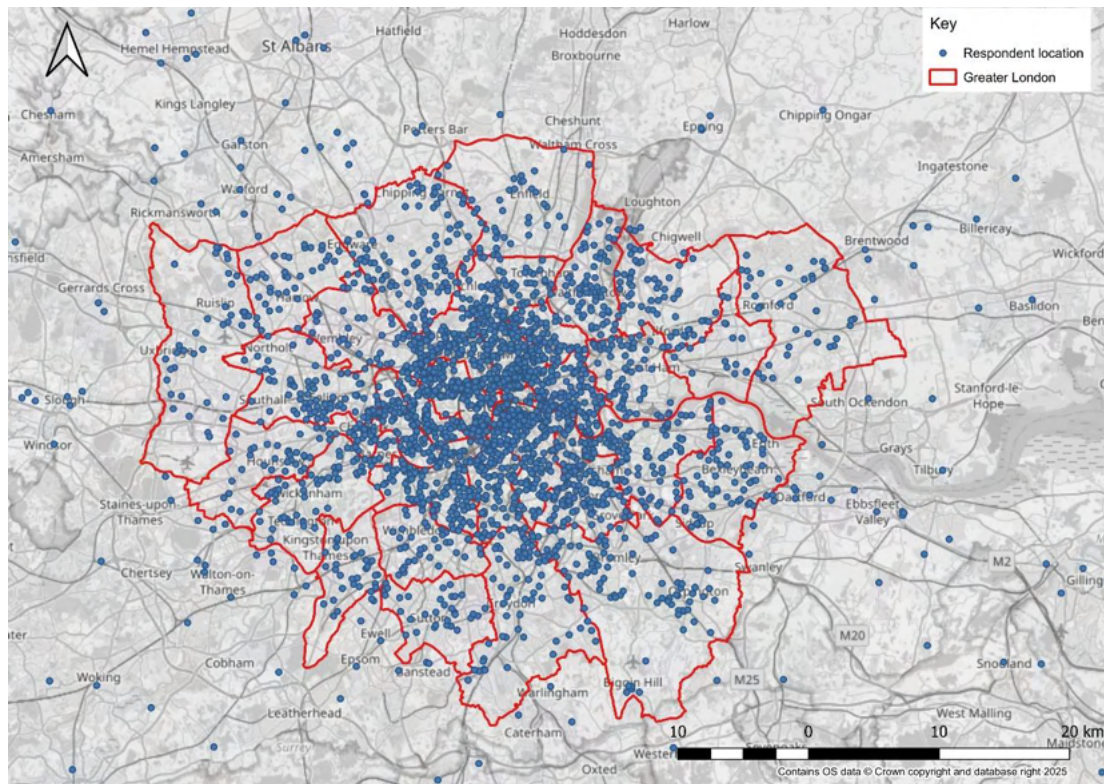
	General public		Routemaster Campaign	
	N	%	N	%
Age				
Under 25	183	8	130	90
25 to 35	328	14	15	10
36 to 45	459	19	0	0
46 to 55	497	21	0	0
55 to 65	481	20	0	0
66 and over	471	19	0	0
Total	2419	100	145	100
Gender				
Male	1725	70%	3	2%
Female	566	23%	17	12%
Other	166	7%	125	86%
Total	2457	100	145	100
Ethnicity				
White (incl White British, Irish, Other)	1810	81%	100	72%
Black, Asian and Minority Ethnic	432	19%	38	28%
Total	2242	100	138	100

Base: all respondents who answered questions. Excludes those who responded 'prefer not to say'.

2.5.3 Respondent location

Respondents were able to, but not required to, provide postcode data as part of the survey. Figure 2-2 shows the location of respondents who provided a postcode.

Figure 2-2 Respondent location map

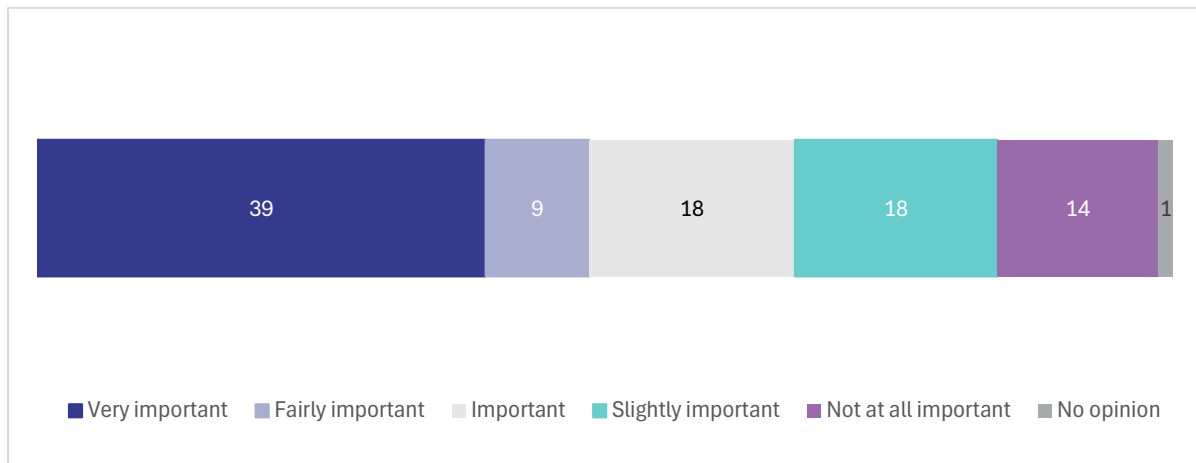


3 Travel perceptions

3.1 Importance of reducing traffic and congestion in Central London

Two thirds (66%) of respondents said it was important, fairly important or very important that TfL take steps to reduce traffic and congestion in central London. A further 18% said it was slightly important, whilst 14% said it was not at all important.

Figure 3-1 Importance of TfL taking steps to reduce traffic and congestion in central London (%)



Base: n=3,287, Question: How important is it to you that we take steps to reduce traffic and congestion in central London?

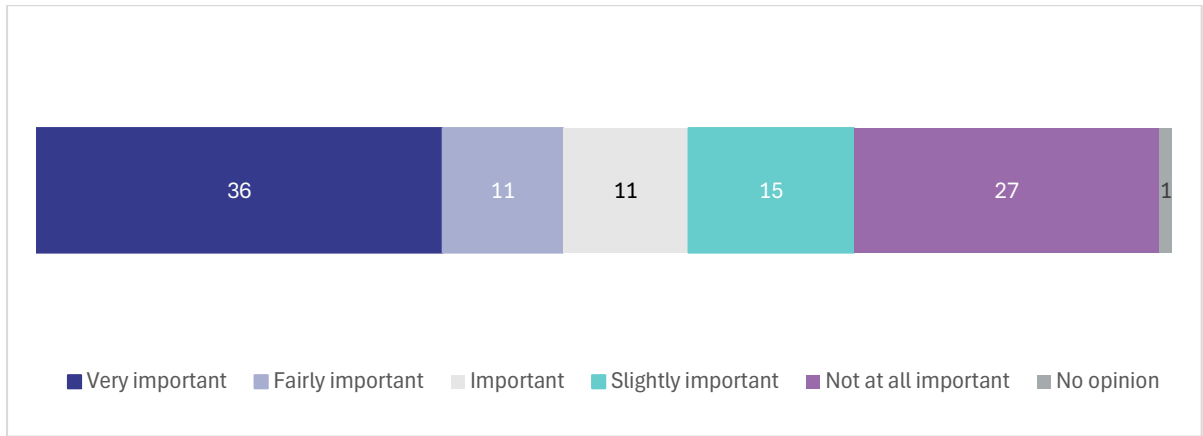
Those who said they drive in the congestion zone were more likely to say it was not important for TfL to take steps to reduce traffic and congestion (41%) compared to residents (30%), those employed in the congestion charge zone (32%) and visitors (28%).

Those aged under 25 (86%) and between 26-35 (52%) were more likely to say it was very important to take steps to reduced traffic and congestion in central London.

3.2 Importance of encouraging the use of zero emission vehicles in Central London

Fifty-eight percent responded that it was important, fairly important or very important that TfL take steps to encourage the use of zero emission vehicles in central London. A further 15% said it was slightly important. More than one quarter (27%) of respondents said it was not at all important to them.

Figure 3-2 Importance of TfL taking steps to encourage use of zero emission vehicles in central London (%)



Base: n=3,175, Question: How important is it to you that we take steps to encourage the use of zero emission vehicles in central London where driving is necessary?

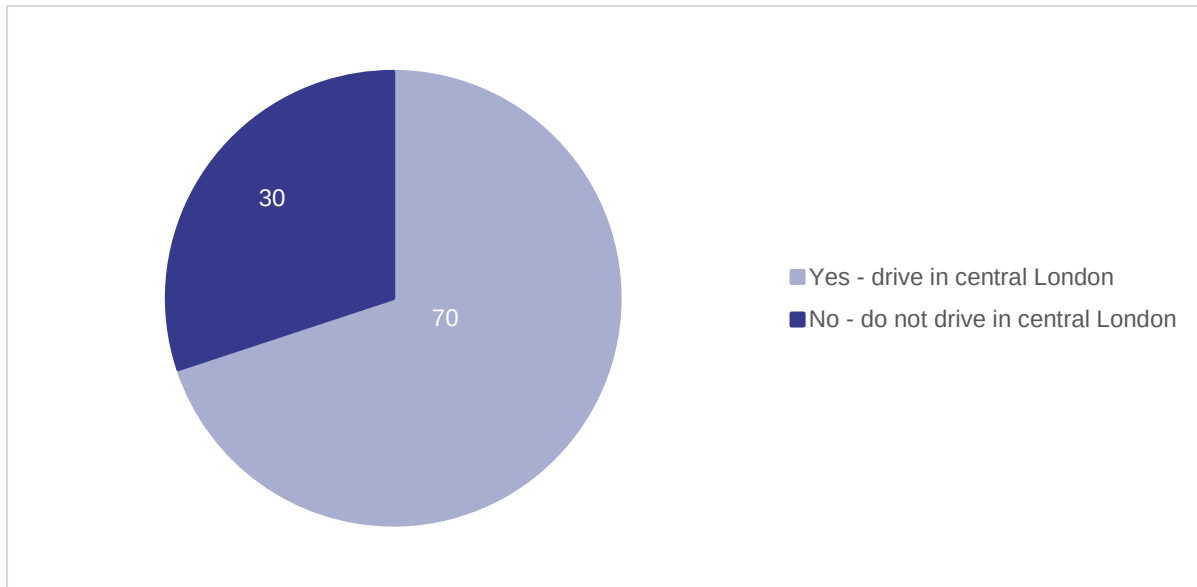
Those aged between 36-45 and 46-55 (43% respectively) were more likely to say it was very important to encourage use of zero emission vehicles in central London.

4 Travel behaviours

4.1 Driving behaviours in central London

Seventy percent of respondents said that they drive in central London (Figure 4-1).

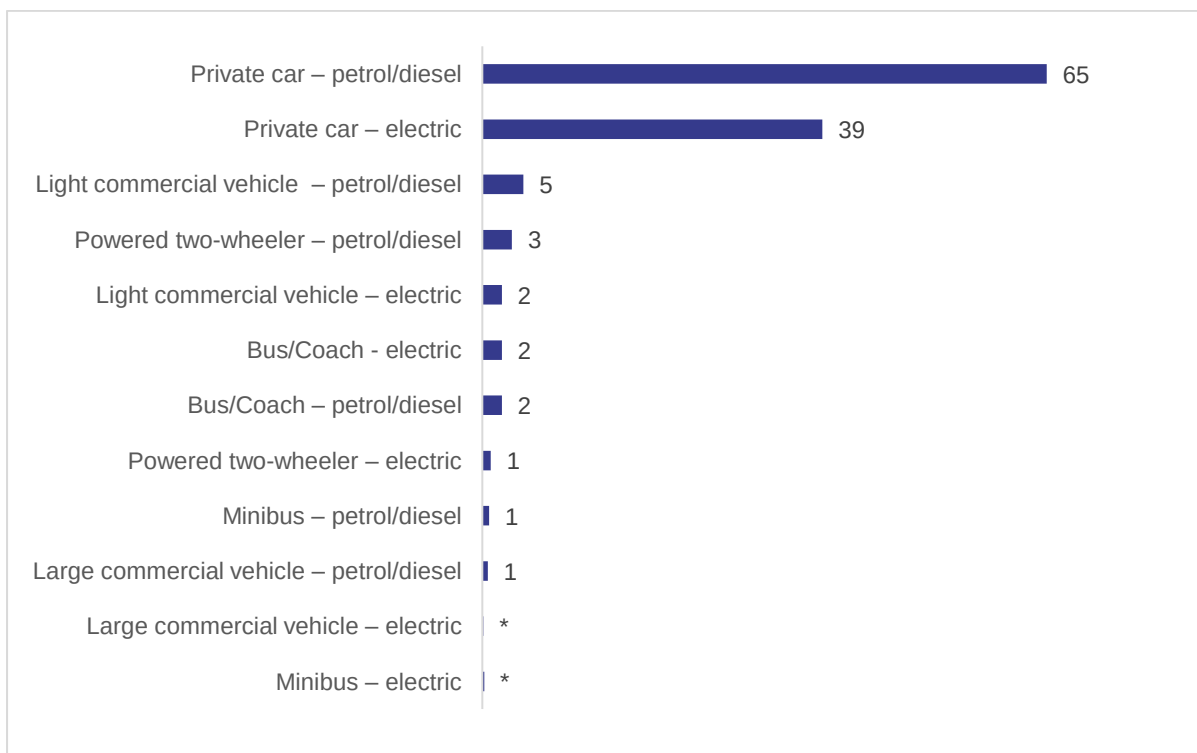
Figure 4-1 Driving in central London (%)



Base: n=3,166, Question: Do you drive in central London?

Of those who drive in central London, around two thirds (65%) said they drive a petrol or diesel private car (Figure 4-2). Two fifths (39%) of respondents said they drive an electric private car.

Figure 4-2 Vehicle type driven (%)

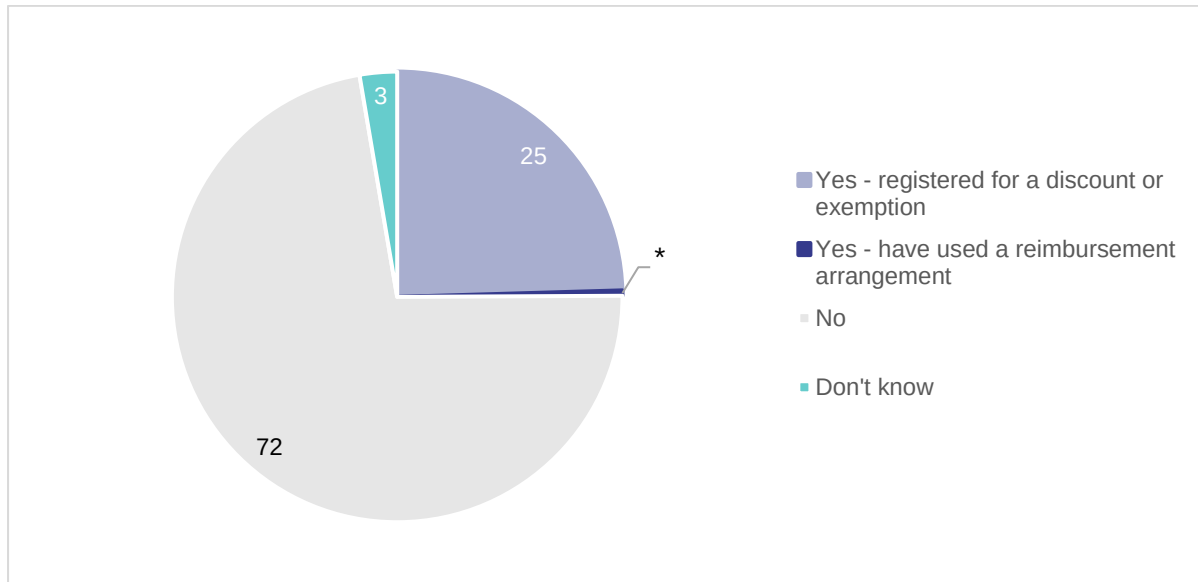


Base: n=2,327, Question: If you drive in central London, what type of vehicle do you usually drive? *Responses less than 1%

4.2 Congestion Charge discounts, exemption and reimbursements

Just over one quarter (25%) of respondents to the consultation were registered for a discount or exemption to the congestion charge.

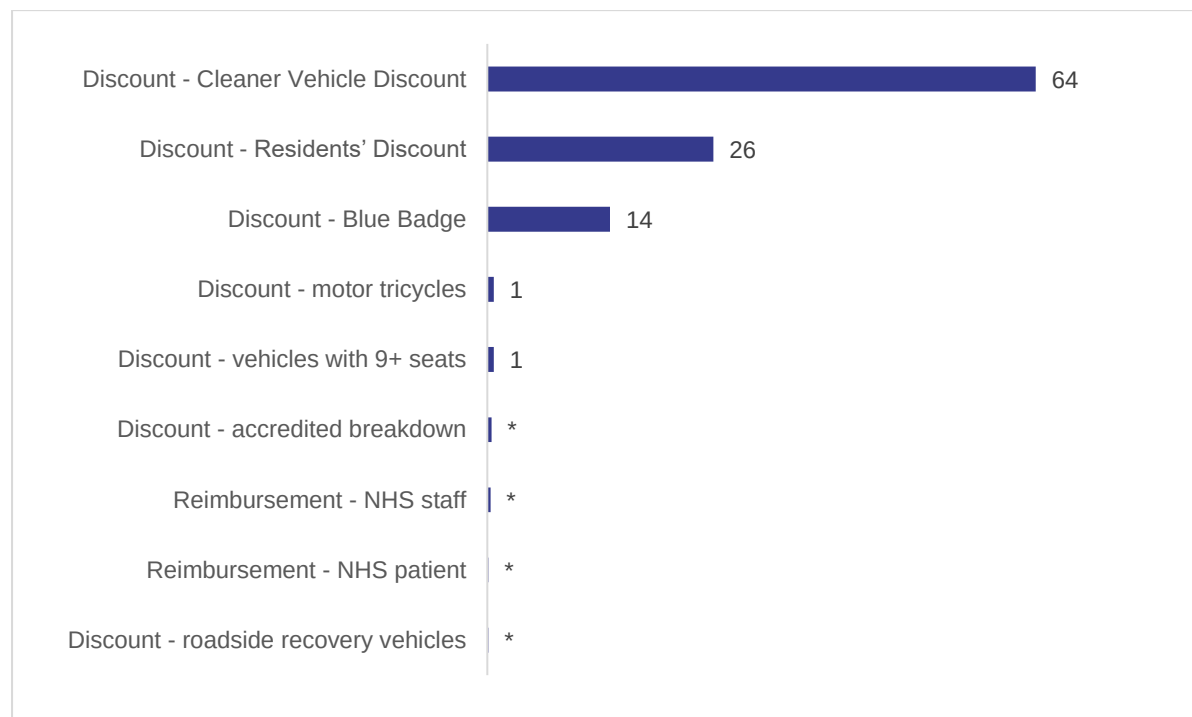
Figure 4-3 Registered for a discount, exemption or have a reimbursement arrangement (%)



Base: n=3,134, Question: Are you registered for a discount or exemption to the Congestion Charge or have you used a reimbursement arrangement? *Responses less than 1%.

Amongst those who were registered for a discount or exemption or who had used a reimbursement arrangement, just under two thirds (64%) were registered for the Cleaner Vehicle Discount. One quarter (26%) were registered for the Residents' Discount and 14% had a Blue Badge.

Figure 4-4 Discount / Reimbursement type (%)

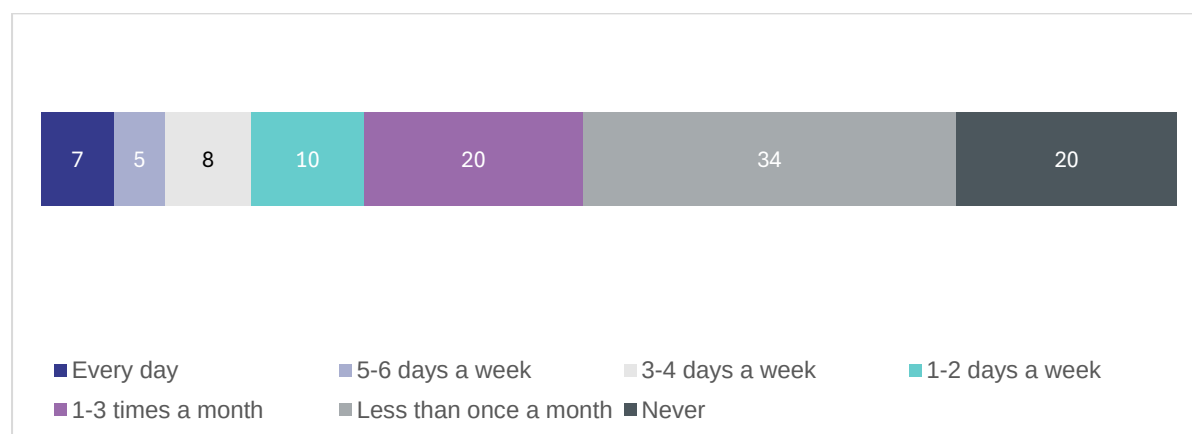


Base: n=801, Question: Please state the discount you are registered for or the reimbursement scheme you have used? *Responses less than 1%.

4.3 Frequency of driving in the Congestion Charge Zone

Thirty percent (30%) of respondents said they drive in the CCZ at least once per week, 12% of whom drive at least five days a week. One fifth (20%) of respondents drive in the CCZ between one and three times a month whilst a third (34%) said they drive less than once per month. One fifth of respondents said they never drive in the CCZ.

Figure 4-5 Frequency of driving in the Congestion Charge Zone (%)



Base: n=3,103, Question: How often do you drive in the Congestion Charge zone?

4.4 Auto Pay Accounts

Half (51%) of respondents said they had an Auto Pay account with TfL (Table 4-1). Around one tenth (11%) of respondents said they did not have an account but intend to register for one.

Table 4-1 Auto Pay account

Response	Count	%
Yes	1586	51
No, but I intend to register for a free account	326	11
No, and I don't intend to register for a free account	1189	38

Base: n=3,101, Question: Do you have an Auto Pay account with TfL?

Those who did have an auto pay account, two-fifths (41%) drove in the congestion charge zone on a weekly basis, while a quarter (26%) drove on a monthly basis. A third (31%) drove less than once a month.

5 Impact of Proposals

5.1 Effectiveness of proposals in achieving TfL's aims to manage traffic and congestion in central London

For Proposal A, B and C, respondents were asked how effective they consider each to be in achieving TfL's aims to manage traffic and congestion in central London (Figure 5-1).

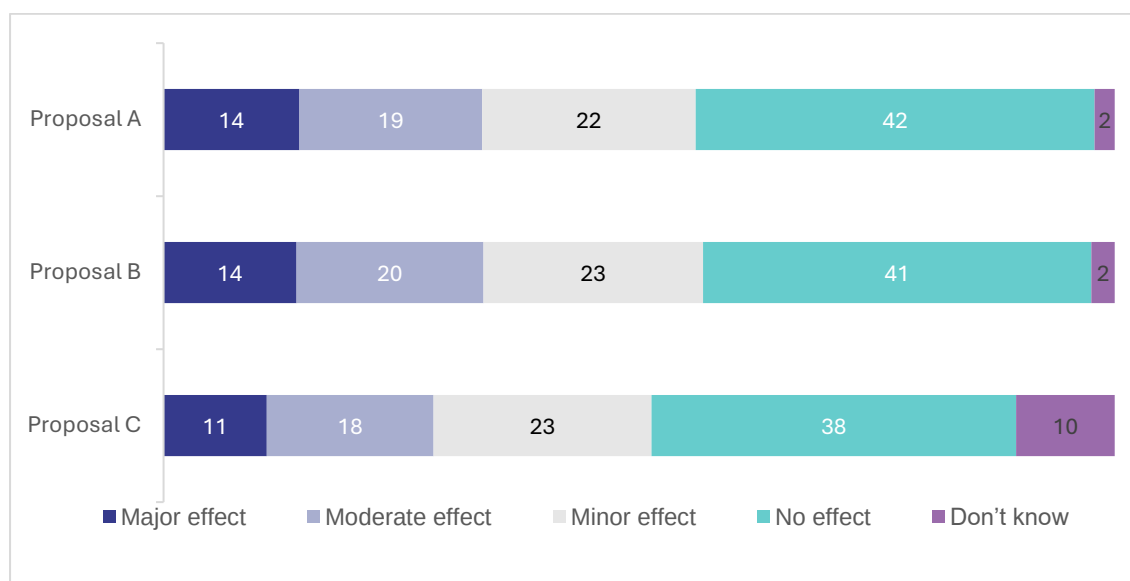
For all three proposals, around two fifths of respondents said they would have no effect (42%, 41%, 38% respectively).

With regards to Proposal A (increasing the Congestion Charge from £15 to £18), one third (33%) considered this proposed change would have a moderate or major effect. A further 22% said it would have a minor effect.

When asked to consider Proposal B (New Cleaner Vehicle Discount for electric vehicles), around one third (34%) said it would have a moderate or major effect in helping TfL manage traffic and congestion in central London. Almost a quarter (23%) said it would have a minor effect.

For Proposal C (change to Residents' Discount for new applicants), a slightly lower proportion of respondents (29%) thought it would have a moderate or major impact. Around one quarter of respondents (23%) thought it would have a minor impact whilst 10% said they did not know how effective the proposal would be.

Figure 5-1 Effectiveness of proposals in achieving TfL aims to manage traffic and congestion in central London (%)



Base: Proposal A (n=3,285); Proposal B (n=3,164); Proposal C (n=3,157), Question: How effective do you consider this proposed change to the Congestion Charge scheme would be in achieving our aims to manage traffic and congestion in central London?

5.2 Impact of proposals on travel within the CCZ

Respondents were asked to consider how the proposals would impact the way they travel within the CCZ (Table 5-1).

More than half (53%) responded that the proposals would not make any difference to the way they travel. Fifteen percent said they would be unable to travel into or within the CCZ. One fifth (19%) said they would travel more by public transport or active travel within the CCZ, whilst four percent said they would travel less by public transport or active travel within the CCZ. Three percent said they would travel more by electric vehicle within the CCZ, whilst six percent said they would travel less by electric vehicle within the CCZ.

Table 5-1 Impact of proposals on travel within the CCZ?

Impact	Count	%
I would travel more within the zone by public transport or active travel	627	19
I would travel less within the zone by public transport or active travel	113	4
I would travel more within the zone by electric vehicle	106	3
I would travel less within the zone by electric vehicle	201	6
I would reduce my frequency of travel into or within the zone*	0	0
I would be unable to travel into or within the zone	481	15
It wouldn't make any difference to the way I travel	1729	53

Base: n=3,257, Question: How do you think our proposals would affect the way you travel within the CCZ?

**This answer option (I would reduce my frequency of travel into or within the zone) was omitted from TfL's online survey due to human error when building the webpage, but it was included in the paper-based survey. However, no respondents selected this option in their paper surveys*

Those who were residents in the CCZ were more likely to say that the proposals wouldn't make any difference to the way they travel within the CCZ (62%) than those employed in the CCZ (50%), visitors to the area (49%) and private hire vehicle drivers (43%).

Those who drive in the CCZ were more likely to say they would be unable to travel into or within the CCZ (20%) than those employed in the CCZ (13%).

Those employed in the CCZ were more likely to say that they would travel more within the zone by public transport or active travel (26%) than residents in the CCZ (15%) and those who drive in the CCZ (7%).

Those under 25 (80%) and aged between 26-34 (34%) were more likely to state they would travel more by public transport or active travel in the CCZ. Conversely, those aged 56-65 (64%) and 66 and over (66%) were more likely to say the proposals wouldn't make any difference to the way they travel.

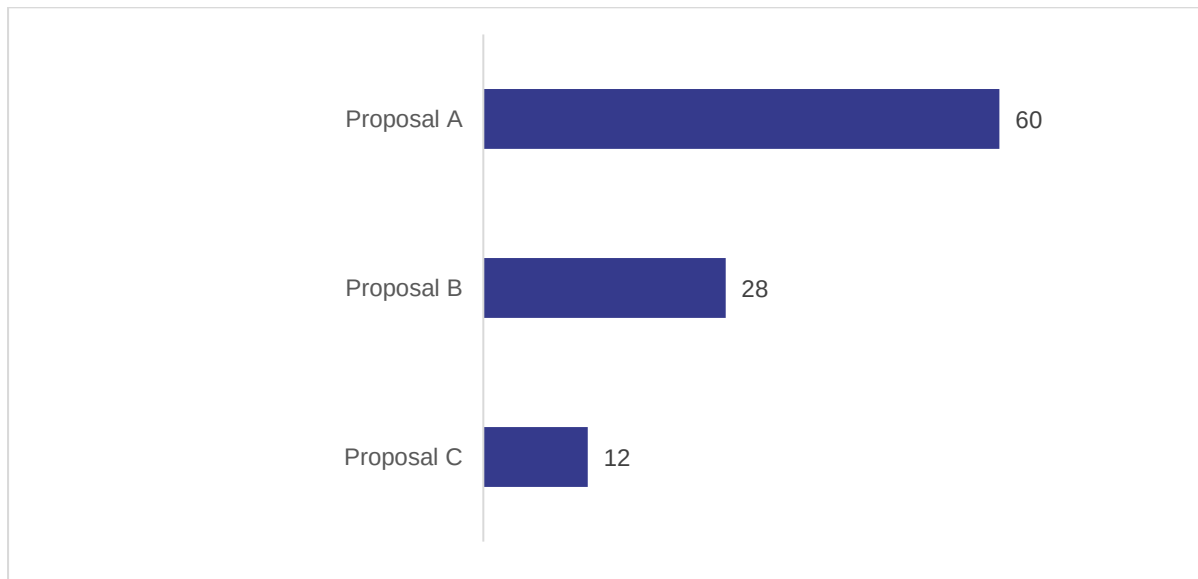
Those travelling into the CCZ at least 1 – 3 times per month were more likely to say that they would be unable to travel into or within the CCZ (22%) than those travelling into the CCZ less frequently (11%).

5.3 Proposals which would likely reduce or prevent travel into or within the CCZ

Those who responded that the proposals would reduce or prevent travel into or within the CCZ, were asked which aspect of the proposed scheme would prevent this (Figure 5-2).

Three fifths (60%) responded that Proposal A would likely reduce or prevent travel into or within the CCZ. More than one quarter (28%) responded that Proposal B would impact their travel and 12% indicated that Proposal C would likely reduce or prevent travel into the CCZ.

Figure 5-2 Proposals which would likely reduce or prevent travel into or within the CCZ (%)

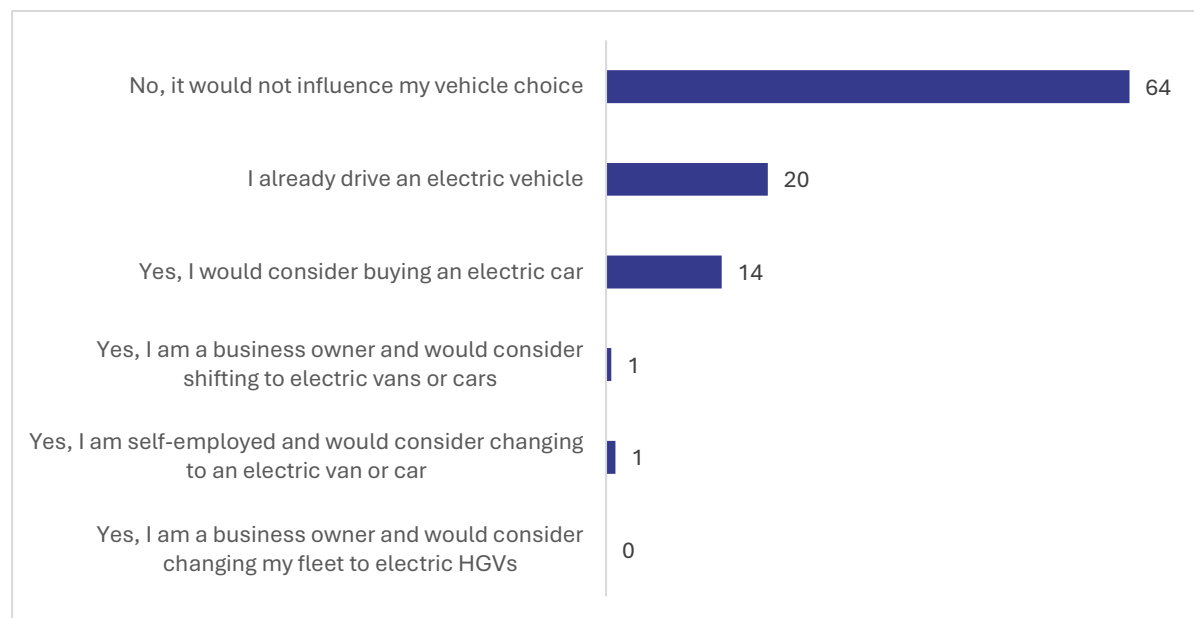


Base: n=1,934, Question: As you've indicated that our proposals would likely reduce or prevent your travel into or within the CCZ, please indicate which element of the scheme would cause this?

5.4 Impact of proposals on future vehicle purchase

Those who responded to the consultation were asked whether the proposals would affect their future intentions when purchasing a vehicle. Just under two thirds (64%) said the proposals would not impact their vehicle choice, whilst one fifth responded that they already drive an electric vehicle. Sixteen percent responded that they would consider buying an electric car or van.

Figure 5-3 Impact of proposals on future vehicle purchase (%)



Base: n=3,133, Question: Would our proposals affect your future intentions when purchasing a vehicle?

Those who were a resident in the congestion charge zone were more likely to say the impact of proposals would not influence their vehicle choice (70%) than those employed in the CCZ (61%), those who drive in the CCZ (60%) and local business owners (51%).

Those who were a local business owner (34%), worked (19%) or drove in the congestion charge zone (28%) were more likely to already be driving an electric vehicle. Almost a fifth (18%) of residents said they would consider buying an electric car.

6 Free text comments on the proposed changes to the congestion charge

6.1 Main comments given about the proposed changes to the congestion charge

Respondents were asked whether they had any comments about the proposed changes to the congestion charge or the proposed changes to the Mayoral Guidance. 3835 respondents left a comment. Table 6-1 shows all comments made by at least 6% of respondents, arranged in order of highest to lowest. This table is provided in Appendix C but separated by sub-theme.

Table 6-1 Comments on the proposals (N)

Theme	Public responses only	Stakeholder responses only	All responses
Oppose/disagree with the Congestion Charge as it is just another tax/money-making scheme	802	13	815
Oppose/disagree with the proposed increase to the charge level (£15 to £18)	674	21	695
Concern about the impact on those who can't use public transport/active travel/are reliant on using cars/taxis (e.g. for work, due to health issues/disabilities, public transport not viable)	561	32	593
Package of proposed changes will have no impact to congestion/traffic levels/will not causes a reduction in the number of people travelling within the Congestion Charge zone	511	20	531
Criticism/negative comment about the Mayor/Government/TfL	458	8	466
Suggest more encouragement/investment in public transport (e.g. more affordable, more frequent, reliable, network coverage, safety improvements etc)	359	18	377
Concern about the lack of affordable electric vehicles/concerns about performance/ sufficient charging infrastructure	328	35	363
Concern that the proposed changes to the Cleaner Vehicle Discount will reduce the number of people upgrading to electric vehicles	257	51	308
Concern about proposed changes to the Cleaner Vehicle Discount on those who upgraded/invested in electric vehicles (e.g. those who upgraded to receive the 100% discount)	273	26	299
Concern that the package of proposed changes will penalise drivers/motorists (general comments)	266	9	275

Theme	Public responses only	Stakeholder responses only	All responses
Concern package of proposed changes will have a negative impact on small businesses/sole traders/tradespeople	221	31	252
Concern about proposed increase to charge level/changes to discounts during cost of living crisis/pressures	240	12	252
Suggest no discount for electric cars (e.g. they still contribute to congestion/traffic levels so shouldn't be discounted)	245	5	250
Concern package of proposed changes will have negative impact on those struggling financially/on lower incomes/essential/key workers (e.g. debt)	237	9	246
Oppose/disagree with new proposed Cleaner Vehicle Discount/providing a discount lower than 100% for EVs (general comment)	227	13	240
Concern package of proposed changes will have negative impact on London's economy/tourism/number of visitors	224	11	235
Concern proposed increase to charge level will have negative impact on those struggling financially/on lower incomes/essential/key workers (e.g. debt)	231	3	234
Concern package of proposed changes will have negative impact on businesses/operations in London (general comments)	201	26	227
Oppose/disagree with the package of proposed changes (general comment)	221	1	222
Suggest extending the 100% discount for all electric vehicles	205	9	214

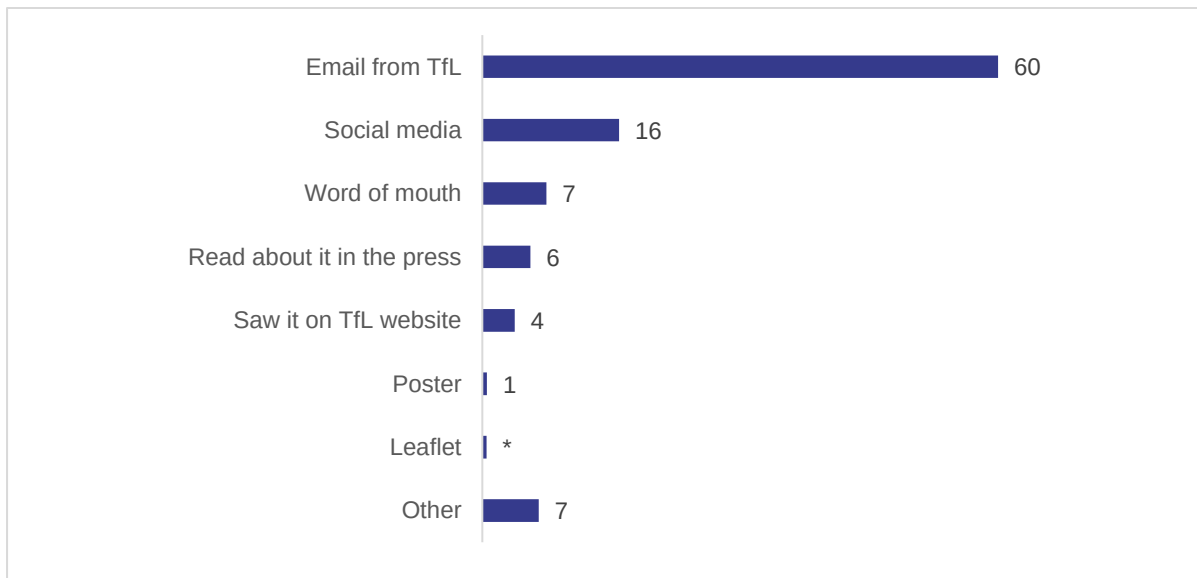
**This includes 42 Zipcar campaign responses and 152 Routemaster Bus campaign responses*

7 About the consultation

7.1 How respondents heard about the consultation

Three fifths of respondents (60%) heard about the consultation through receiving an email from TfL. A further 16% heard about the consultation on social media and 7% were made aware through word of mouth (Figure 7-1).

Figure 7-1 How respondents heard about the consultation (%)

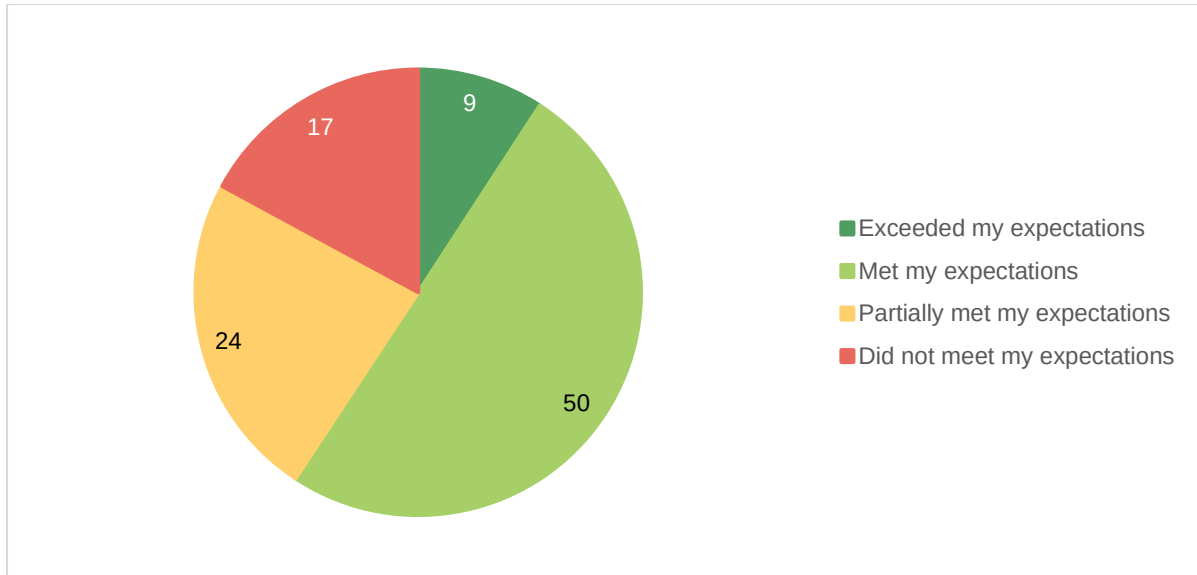


Base: n=3,132, *Responses less than 1%. Question: How did you hear about the consultation? Please select the main way you heard:

7.2 Experience of participating in the consultation

Participation in the consultation exceeded expectations for 9% of respondents, met expectations for half (50%) of respondents and partially met expectations for one quarter (24%) of respondents. Seventeen percent of respondents felt the consultation did not meet expectations (Figure 7-2).

Figure 7-2 Experience of participating in the consultation (%)



Base: n=3,199, Question: Having just completed this consultation, which of the following statements best reflects your experience of accessing the consultation information and sharing your feedback with us.

7.3 Free text comments on how to improve consultation service

Respondents were asked whether they had any comments on how they would like TfL to improve the consultation service in the future. 971 respondents left a comment. Table 7-1 shows all comments made by at least 5% of respondents, arranged in order of highest to lowest. This table is provided in Appendix E but separated by sub-theme.

Table 7-1 Comments on how to improve the consultation service (N)

Theme	Public responses only	Stakeholder responses only	All responses
Consultation/questions are biased/leading	378	4	382
Response options to questions were limited/should have been more response options	318	3	321
Concern consultation responses will have no/little impact on TfL decisions/just a tickbox exercise	239	3	242
Issues with the survey not working correctly/reporting errors with the questions	124	0	124
Should have asked about other topic areas	57	3	60
Consultation/survey was difficult to find/access (general comment)	55	1	56
Promotion/advertising/awareness of consultation is poor/low/lacking	49	1	50
Questions were complicated/unclear/should have been clearer	49	1	50

Appendix A Questionnaire



Tell us your views Congestion Charge proposals

We are holding a ten week public consultation to hear what you think about these proposals. We want to know if you agree with them, if there is anything you do not agree with, and to understand the reasons why you feel this way.

You can reply by completing our survey which you can post to 'FREEPOST, TfL Have Your Say (Congestion Charge proposals)' (no stamp needed)

The closing date for responses is Monday 11 August 2025.

If you prefer, you can also:

- Email: haveyoursay@tfl.gov.uk
- Telephone: 020 3054 6037 to leave your name and contact number and we will call you back. Please quote 'Congestion Charge proposals' when leaving your message
- Complete our online survey at <https://haveyoursay.tfl.gov.uk/congestion-charge-proposals>

What happens next

The consultation runs from 27 May to 11 August 2025.

Once consultation ends on Monday 11 August 2025, we will spend time considering all the responses we have received and will prepare a consultation report.

The consultation report will help the Mayor to reach a decision on whether to confirm the proposals for the CC Scheme, with or without modification, and publish the revisions to the Mayoral Guidance.

The report will be published to our consultation webpage and made available to everyone. In addition, we will write to all those who take part in the consultation to share the report upon publication.



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Section (i): About you

To help us understand a bit more about you, please answer the following questions.

1. Please confirm if you are responding as an individual or as an official representative of an organisation (e.g. interest group, charity or trade body).

(Choose one option)

- ☐ As an individual
- ☐ As an official representative of an organisation

2. If you are responding as an official representative of an organisation, then please provide your organisation name below.

3. Please confirm your postcode:

4. What encouraged you to complete this questionnaire?

I'm interested in the proposals because...

(You can choose more than one option)

- ☐ I'm a resident in the Congestion Charge zone
- ☐ I'm a local business owner in the Congestion Charge zone
- ☐ I'm employed in the Congestion Charge zone
- ☐ I drive in the Congestion Charge zone
- ☐ I'm a visitor to the area
- ☐ I'm a taxi driver (Black Cab)
- ☐ I'm a private hire vehicle driver
- ☐ I'm just interested in the proposals

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☐ Other (*Please specify below*)

Section (ii): Your travel views

To help us understand your views on travel in London, please answer the following questions.

5. How important is it to you that we take steps to reduce traffic and congestion in central London?

(Choose any one option)

- ☐ Not at all important
- ☐ Slightly important
- ☐ Important
- ☐ Fairly important
- ☐ Very important
- ☐ No opinion

6. How important is it to you that we take steps to encourage the use of zero emission vehicles in central London where driving is necessary?

(Choose any one option)

- ☐ Not at all important
- ☐ Slightly important
- ☐ Important
- ☐ Fairly important
- ☐ Very important
- ☐ No opinion



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Section (iii): Your travel habits

To help us understand more about how you travel in London, please answer the following questions.

7. Do you drive in central London?

- ☐ Yes
- ☐ No

8. If you drive in central London, what type of vehicle do you usually drive?

(Please tick all that apply)

- ☐ Bus/Coach - electric
- ☐ Bus/Coach – petrol/diesel
- ☐ Large commercial vehicle (truck, HGV) – electric
- ☐ Large commercial vehicle (truck, HGV) – petrol/diesel
- ☐ Light commercial vehicle (van, pickup truck, three-wheeler) – petrol/diesel
- ☐ Light commercial vehicle (van, pickup truck, three-wheeler) – electric
- ☐ Minibus – electric
- ☐ Minibus – petrol/diesel
- ☐ Powered two-wheeler (e.g. Moped, motorcycle)electric
- ☐ Powered two-wheeler (e.g. Moped, motorcycle) – petrol/diesel
- ☐ Private car – electric
- ☐ Private car – petrol/diesel

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9. Are you registered for a discount or exemption to the Congestion Charge or have you used a reimbursement arrangement?

- ☐ Yes I am registered for a discount or exemption
- ☐ Yes I have used a reimbursement arrangement
- ☐ No
- ☐ Don't know

10. If relevant, please state the discount you are registered for or the reimbursement scheme you have used. (Please tick all that apply)

- ☐ Discount - Residents' Discount
- ☐ Discount - Cleaner Vehicle Discount
- ☐ Discount - Blue Badge
- ☐ Discount - accredited breakdown
- ☐ Discount - vehicles with 9+ seats
- ☐ Discount - motor tricycles
- ☐ Discount - roadside recovery vehicles
- ☐ Reimbursement - NHS patient
- ☐ Reimbursement - NHS staff

11. How often do you drive in the Congestion Charge zone? (Please tick all that apply)

- ☐ Every day
- ☐ 5- 6 days a week
- ☐ 3-4 days a week
- ☐ 1-2 days a week
- ☐ 1-3 times a month
- ☐ Less than once a month
- ☐ Never

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12. Do you have an Auto Pay¹ account with TfL?

- ☐ Yes
- ☐ No, but I intend to register for a free account
- ☐ No, and I don't intend to register for a free account

Section (iv): Our proposals

The Congestion Charge scheme is an important tool for managing traffic and congestion in central London. It has been kept under review to ensure it remains effective and supports the delivery of Mayor's Transport Strategy.

We are now proposing changes to the charge level, a new Cleaner Vehicle Discount and the Residents' Discount for new applicants. For full details please see the consultation materials. If introduced, these proposed changes would come into effect from 2 January 2026.

The proposals we are now consulting on are:

- Proposal A: Increasing the Congestion Charge from £15 to £18
- Proposal B: New Cleaner Vehicle Discount for electric vehicles
- Proposal C: Change to Residents' Discount for new applicants

The new proposals are part of the commitment by the Mayor of London and TfL to manage traffic and congestion in central London. This would improve London's air quality and encourage more journeys to be made by walking, cycling or public transport.

Mayoral Guidance on TfL's exercise of road user charging functions

The Mayor may issue guidance as to the exercise of our road user charging functions. We must have regard to any guidance that is issued.

On behalf of the Mayor, we are also seeking views on some proposed changes to the guidance which would better reflect the approach TfL follows when undertaking consultations in comparable circumstances and when setting charges for TfL services, notably public passenger transport fares.

¹ Auto Pay is a free to register service that enables you to be billed automatically when you travel through the Silvertown or Blackwall tunnels. If you have an existing AutoPay account for Congestion Charge or ULEZ charges you do not need to register again. For more information please visit our webpage: <https://tfl.gov.uk/modes/driving/auto-pay>.

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13. Proposal A: Increasing the Congestion Charge from £15 to £18

How effective do you consider this proposed change to the Congestion Charge scheme would be in achieving our aims to manage traffic and congestion in central London?

- ☐ No effect
- ☐ Minor effect
- ☐ Moderate effect
- ☐ Major effect
- ☐ Don't know

14. Proposal B: New Cleaner Vehicle Discount for electric vehicles

How effective do you consider this proposed change to the Congestion Charge scheme would be in achieving our aims to manage traffic and congestion in central London?

- ☐ No effect
- ☐ Minor effect
- ☐ Moderate effect
- ☐ Major effect
- ☐ Don't know

15. Proposal C: Change to Residents' Discount for new applicants

How effective do you consider this proposed change to the Congestion Charge scheme would be in achieving our aims to manage traffic and congestion in central London?

- ☐ No effect
- ☐ Minor effect
- ☐ Moderate effect
- ☐ Major effect
- ☐ Don't know

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16. Do you have any comments about the proposals or the proposed changes to the Mayoral Guidance?.This could include comments about the impact, positive or negative, that our proposals may have on you.

Please highlight if this impact is due to a protected characteristic you may have, or whether the impact may affect others due to their protected characteristic.

Please note which proposal your comment is about or if you are commenting on the Mayoral Guidance.

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17. How do you think our proposals would affect the way you travel within the CCZ?

- ☐ I would travel more within the zone by public transport or active travel (Please go to Q19)
- ☐ I would travel less within the zone by public transport or active travel (Please go to Q19)
- ☐ I would travel more within the zone by electric vehicle (Please go to Q19)
- ☐ I would travel less within the zone by electric vehicle (Please go to Q19)
- ☐ I would reduce my frequency of travel into or within the zone (Please go to Q19)
- ☐ I would be unable to travel into or within the zone (Please go to Q18)
- ☐ It wouldn't make any difference to the way I travel (Please go to Q18)

18. As you've indicated that our proposals would likely reduce or prevent your travel into or within the CCZ, please indicate which element of the scheme would cause this?

- ☐ Proposal A: Charge level increase to £18
- ☐ Proposal B: New Cleaner Vehicle Discount for electric vehicles
- ☐ Proposal C: Change to Residents' Discount for new applicants from March 2027

19. Would our proposals affect your future intentions when purchasing a vehicle?

- ☐ Yes, I am a business owner and would consider shifting to electric vans or cars
- ☐ Yes, I am a business owner and would consider changing my fleet to electric HGVs
- ☐ Yes, I am self-employed and would consider changing to an electric van or car
- ☐ Yes, I would consider buying an electric car
- ☐ I already drive an electric vehicle
- ☐ No, it would not influence my vehicle choice

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Section (v): About the consultation

20. How did you hear about the consultation? Please select the main way you heard:

- ☐ Poster
- ☐ Leaflet
- ☐ Email from TfL
- ☐ Social media
- ☐ Saw it on the TfL website
- ☐ Read about it in the press
- ☐ Word of mouth
- ☐ Heard a radio advertisement
- ☐ Other (please specify)

21. Having just completed this consultation, which of the following statements best reflects your experience of accessing the consultation information and sharing your feedback with us.

- ☐ Exceeded my expectations: It was very easy to find the information I needed, and it was very easy to respond.
- ☐ Met my expectations: I was able to find the information I needed, and it was straightforward to respond.
- ☐ Partially met my expectations: I struggled to find some of the information I needed, and I found it difficult to respond.
- ☐ Did not meet my expectations: I couldn't find the information I needed, and it was very difficult to respond.

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22. If we didn't meet your expectations, please tell us how you would like us to improve our consultation service in the future.

Please only share your feedback on how we can improve our consultation service here. If you want to leave further feedback on the proposals that we're consulting on, then please return to Q16 above and leave your feedback there.

23. It's always good to talk and we're always keen to discuss how we'll improve our consultation service going forward. If you'd be interested in taking part in helping to shape our consultation service in the future, by taking part in quick polls, webinars, surveys or focus groups, then select one or more of the options below:

- ☐ Yes – I'd like to take part in online surveys or quick polls
- ☐ Yes – I'd like to take part in focus groups or webinars
- ☐ No – I'm not interested in taking part in this research



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About you

If you would like us to keep you informed about the outcome of this consultation.
Please provide us with your name and email address or postal address:

All personal information will be kept confidential. Your personal information
will be properly safeguarded and processed in accordance with the
requirements of privacy and data protection legislation. For further
information, [please visit our privacy policy](#).

Name:	
Email:	
Address:	
Postcode:	



Appendix B Campaign responses

The full standard text of responses provided as part of the Zipcar campaign is shown below, as well as the codes allocated to the campaign responses. The table further below shows the coding counts for both the Zipcar and Routemaster campaigns.

For the Zipcar campaign responses, some respondents chose to only include the standard text, with other respondents adding their own additional comments to the standard text. It should be noted that one of the stakeholders, Zipcar, was also considered to be part of the campaign.

The responses received as part of the Routemaster campaign varied, but each response requested that TfL invest in new Routemaster buses which was allocated code 347.

Campaign	Standard text	Codes allocated to response
Zipcar	• Introduce a reduced daily Congestion Charge rate specifically for car club vehicles, recognising the role that car clubs play in reducing congestion in London. • Continue the current electric vehicle exemption specifically for car club vehicles, enabling us to continue our electrification efforts.	109,44

The table below shows the coding counts for the Zipcar and Routemaster campaigns. To see the impact of the campaign responses on the total coding counts, the totals for each appropriate code are shown for all responses, including campaigns.

Theme	Zipcar	Routemaster
Suggest Cleaner Vehicle Discount should be higher for electric car clubs/car-sharing	42	0
Suggest charges should be lower for other specified types of vehicles/people	42	0
Other specific suggestion to reduce congestion/pollution (e.g. needs to be more encouragement/investment in other green	9	0
Concern that Congestion Charge costs will be/are being passed onto residents/customers from businesses/services (e.g. t	6	0
Oppose/disagree with the proposed increase to the charge level (£15 to £18)	4	0
Package of proposed changes will cause more congestion/traffic levels/increase it	3	0
Suggest extending the 100% discount for all electric vehicles	2	0
Concern that the proposed changes to the Cleaner Vehicle Discount will reduce the number of people upgrading to electric	2	0
Concern package of proposed changes will have negative impact on businesses/operations in London (general comments)	2	0
Concern about the impact on those who can't use public transport/active travel/are reliant on using cars/taxis	2	0
Concern proposed changes will encourage use of petrol/diesel cars / slow down transition to EVs	2	0
Response options to questions were limited/should have been more response options	2	0
Oppose/disagree with the package of proposed changes (general comment)	1	0
Oppose/disagree with the Congestion Charge as it is just another tax/money-making scheme	1	0
Oppose/disagree with new proposed Cleaner Vehicle Discount/providing a discount lower than 100% for EVs (general comment	1	0
Eligibility for CVD should be based on vehicle size, weight, emissions etc	1	0
Support/agree with the proposed residents' discount for new applicants (i.e. applying to only electric vehicles from Ma	1	0

Theme	Zipcar	Routemaster
Concern about the lack of affordable electric vehicles/concerns about performance/ sufficient charging infrastructure	1	0
Other comment/suggestion for residents' discount/for new applicants	1	0
Oppose/disagree with allowing increases to charge levels without consultation (based on Tube/TfL railway fares/annual i	1	0
Suggest another way for applying the Congestion Charge/road user charging (e.g. dependent on vehicle size, weight, distance travelled, emissions)	1	0
Concern package of proposed changes will have negative impact on local residents	1	0
Concern package of proposed changes will have a negative impact on small businesses/sole traders/tradespeople	1	0
Concern package of proposed changes will have negative impact on those struggling financially/ on lower incomes/essential/key workers (e.g. debt)	1	0
Concern proposed increase to charge level will have negative impact on those struggling financially/on lower incomes/es	1	0
Package of proposed changes will have no impact to air quality/emissions	1	0
Concern proposed increase to charge level will negatively impact disabled people (general comment)	1	0
Suggest more incentives for upgrading to electric vehicles (not captured elsewhere in codeframe)	1	0
Survey was poor quality/design/presentation (general comment)	1	0
Issues with the survey not working correctly/reporting errors with the questions	1	0
Consultation/survey was difficult to find/access (general comment)	1	0
Concern consultation responses will have no/little impact on TfL decisions/just a tickbox exercise	1	0
Suggestion about vehicle type e.g. tram-style/double decker electric/new routemasters/zero-emission buses/vehicle accessibility	0	152
Out of scope comment/unrelated to proposals and not captured elsewhere	0	152
Reference to people with protected characteristics (e.g. age, disability, gender, ethnicity, religion)	0	44

Theme	Zipcar	Routemaster
Comment/comparison to other country/city	0	10
Suggest charge should be higher than £18/higher in general	0	3
Query about how funds raised through Congestion Charge/other charging schemes are used	0	3
Support/agree with the proposed increase to the charge level (£15 to £18)	0	2
Suggest further increases to the charge level over time/how increases should be calculated	0	2
Other (does not fit into codeframe)	0	2
Support/agree with the package of proposed changes (general comment)	0	1
Suggest extending the Congestion Charge zone/increase the boundary	0	1
Supportive/positive comment about the Mayor/Government/TfL	0	1
Criticism/negative comment about the Mayor/Government/TfL	0	1

Appendix C Coding table

This table shows the counts for all comments received in response to the consultation.

Theme	Public responses only	Stakeholder responses only	All responses
General			
Support/agree with the package of proposed changes (general comment)	135	5	140
Oppose/disagree with the package of proposed changes (general comment)	221	1	222
Support/agree with the Congestion Charge/positive comment about it (general comment)	0	3	3
Oppose/disagree with the Congestion Charge/is not necessary/suggest it should be abolished	133	4	137
Oppose/disagree with the Congestion Charge as it is just another tax/money-making scheme	802	13	815
Suggest package of proposals should go further (general comment)	66	0	66
Support/agree car/vehicle use needs to be reduced further/discouraged (general comment)	183	17	200
Concern that the package of proposed changes will penalise drivers/motorists (general comments)	266	9	275
Proposed charge increase			
Support/agree with the proposed increase to the charge level (£15 to £18)	114	11	125
Suggest charge should be higher than £18/higher in general	183	5	188
Suggest charge should be higher than £15 but less than £18	12	1	13
Oppose/disagree with the proposed increase to the charge level (£15 to £18)	674	21	695
Suggest charge should be lower/is already expensive (general comments)	138	0	138

Theme	Public responses only	Stakeholder responses only	All responses
Charge levels			
Suggest further increases to the charge level over time/how increases should be calculated	45	2	47
Concern about further increases to the charge level over time/how increases will be calculated	20	4	24
Suggest charge should be lower for business/commercial/freight vehicles	12	2	14
Suggest charges should be higher for other specified types of vehicles/people	82	0	82
Suggest charges should be lower for other specified types of vehicles/people	74	5	79
Suggest charges should be higher for motorbikes/to not be exempt	9	1	10
Charging period			
Suggest charging period/hours should be extended (general comments)	15	6	21
Suggest charging period/hours should be reduced (general comments)	23	0	23
Suggest charging period should apply 24/7/all the time	19	1	20
Suggest charging period should only apply during peak times/when congestion is worst	9	0	9
Other comment/suggestion for charging period/days/times for Congestion Charge	48	9	57
Congestion charge should be removed / there should be no charge at weekends	41	2	43
Congestion Charge zone			
Suggest extending the Congestion Charge zone/increase the boundary	47	1	48
Suggest reducing the Congestion Charge zone/decrease the boundary	4	0	4
Concern about confusion whether have travelled in the Congestion Charge zone/should have a way to check	27	0	27
Other comment/suggestion on the Congestion Charge zone/boundary	30	1	31

Theme	Public responses only	Stakeholder responses only	All responses
Cleaner Vehicle Discount (CVD)			
Support/agree with new proposed Cleaner Vehicle Discount/providing a discount lower than 100% for EVs (general comment)	82	8	90
Oppose/disagree with new proposed Cleaner Vehicle Discount/providing a discount lower than 100% for EVs (general comment)	227	13	240
Suggest extending the 100% discount for all electric vehicles	205	9	214
Suggest a higher discount for electric vans, HGVs, quadricycles (i.e. higher than 50%)	18	14	32
Suggest a lower discount for electric vans, HGVs, quadricycles (i.e. lower than 50%)	9	0	9
Suggest no discount for electric vans, HGVs, quadricycles	58	0	58
Suggest a higher discount for electric cars (i.e. higher than 25%)	105	6	111
Suggest a lower discount for electric cars (i.e. lower than 25%)	15	0	15
Suggest no discount for electric cars (e.g. they still contribute to congestion/traffic levels so shouldn't be discounted)	245	5	250
Suggest Cleaner Vehicle Discount should be higher for electric car clubs/car-sharing	136	20	156
Suggest Cleaner Vehicle Discount should be higher for electric PHVs	61	12	73
Suggest Cleaner Vehicle Discount should be higher for electric business/commercial/freight vehicles	15	20	35
Suggest Cleaner Vehicle Discount should be higher for electric vehicles of small businesses/sole traders/tradespeople	8	16	24
Concern that the proposed changes to the Cleaner Vehicle Discount will reduce the number of people upgrading to electric	257	51	308
Concern that the proposed changes to the Cleaner Vehicle Discount will have a negative financial impact on those who do	74	2	76
Concern about proposed changes to the Cleaner Vehicle Discount on those who upgraded/invested in electric vehicles (e.g.	273	26	299
Other comment/suggestion about the Cleaner Vehicle Discount	128	31	159
Eligibility for CVD should be based on vehicle size, weight, emissions etc	5	0	5

Theme	Public responses only	Stakeholder responses only	All responses
Auto Pay			
Oppose/disagree with Cleaner Vehicle Discount only applying to those registered with Auto Pay	5	3	8
Other comment/suggestion about Auto Pay	10	5	15
Residents' discount			
Suggest there should not be a residents' discount	35	2	37
Concern that continuing to provide residents' discount will not reduce congestion/discourage car use	16	5	21
Suggest residents' discount should be higher (i.e. higher than 90%)/residents should be exempt	78	1	79
Suggest residents' discount should be lower (i.e. lower than 90%)	33	3	36
Suggest residents' discount should only be provided for those with electric vehicles (general comment)	9	1	10
Support/agree with the proposed residents' discount for new applicants (i.e. applying to only electric vehicles from Ma	33	5	38
Oppose/disagree with the proposed residents' discount for new applicants only applying to electric vehicles/should continue to provide it for all types of vehicles	171	4	175
Suggest residents' discount should be lower for electric vehicles/new applicants (i.e. lower than 90%)	1	0	1
Concern about the lack of affordable electric vehicles/concerns about performance/ sufficient charging infrastructure	328	35	363
Suggest phasing out the residents' discount over time	19	3	22
Concern/queries about how the residents' discount will work/how it will be applied	22	0	22
Other comment/suggestion for residents' discount/for new applicants	63	12	75
Concern residents' discount will impact desirability of living in central London/dissuade people from buying / impact property prices'	14	0	14
Other discounts			

Theme	Public responses only	Stakeholder responses only	All responses
Suggest there should be no discounts for anyone	29	0	29
Suggest discount for blue badge holders should continue	42	8	50
Suggest there should be a discount for other people with health issues/disabilities (i.e. in addition to blue badge holders	14	3	17
Suggest there should be a discount for other specified users/groups	28	1	29
Exemptions			
Support/agree with taxis (black cabs) being exempt from charges/should not be charged	16	0	16
Suggest taxis (black cabs) should not be exempt from charges/should be charged	16	1	17
Suggest PHVs should be exempt from charges/should not be charged (non-electric vehicles and general comment)	41	3	44
Support/agree with PHVs not being exempt from charges/should be charged	8	0	8
Suggest taxis/PHVs (cannot determine which) should be exempt from charges/should not be charged	2	0	2
Suggest taxis/PHVs (cannot determine which) should not be exempt/should be charged	6	0	6
Suggest there should be exemptions/no charge for other specified types of vehicles/people	118	12	130
Mayoral guidance on TfL's exercise of road user charging functions			
Support/agree with allowing changes to be made to schemes without consultation (general comment)	1	0	1
Oppose/disagree with allowing changes to be made to schemes without consultation/concern about accountability/transparency	12	6	18
Support/agree with allowing increases to charge levels without consultation (based on Tube/TfL railway fares/annual inf	61	12	73
Oppose/disagree with allowing increases to charge levels without consultation (based on Tube/TfL railway fares/annual i	26	9	35
Oppose/disagree with allowing procedural/administrative changes to be made to schemes without consultation	0	1	1
Comment about the proposed change to minimum consultation periods/time frames	7	6	13

Theme	Public responses only	Stakeholder responses only	All responses
Other comment/suggestion about mayoral guidance	6	6	12
Active travel and public transport			
Package of proposed changes will positively impact/cause an increase in active travel (e.g. walking, cycling etc)	17	0	17
Suggest more encouragement/investment in active travel (walking, cycling, infrastructure, pedestrianisation)	104	8	112
Suggest more enforcement of poor cyclist behaviour	41	0	41
Package of proposed changes will positively impact/cause an increase in public transport use (e.g. bus, Tube, train etc)	13	0	13
Suggest more encouragement/investment in public transport (e.g. more affordable, more frequent, reliable, network cover	359	18	377
Road user charging			
Suggest Congestion Charge should focus on congestion/traffic reduction rather than air quality/pollution/emissions (e.g	85	0	85
Other comment/suggestions about existing ULEZ	45	4	49
Suggest another way for applying the Congestion Charge/road user charging (e.g. dependent on vehicle size, weight, dist	165	13	178
Other comment/suggestion about the Congestion Charge	84	4	88
Financial impacts			
Concern package of proposed changes will have negative impact on local residents	140	8	148
Concern package of proposed changes will have a negative impact on my business/livelihood	61	8	69
Concern package of proposed changes will have a negative impact on small businesses/sole traders/tradespeople	221	31	252
Concern package of proposed changes will have negative impact on businesses/operations in London (general comments)	201	26	227
Concern package of proposed changes will have negative impact on London's economy/tourism/number of visitors	224	11	235

Theme	Public responses only	Stakeholder responses only	All responses
Concern that Congestion Charge costs will be/are being passed onto residents/customers from businesses/services (e.g. t	175	24	199
Concern about the cumulative financial impact of charges/charge increases from multiple schemes (e.g. ULEZ, Silvertown	134	15	149
Concern about proposed increase to charge level/changes to discounts during cost of living crisis/pressures	240	12	252
Concern package of proposed changes will have negative impact on those struggling financially/on lower incomes/essential/key workers (e.g. debt)	237	9	246
Concern proposed increase to charge level will have negative impact on those struggling financially/on lower incomes/es	231	3	234
Concern proposed changes to discounts will have negative impact on those struggling financially/on lower incomes/essential/key workers (e.g. debt)	33	6	39
Social impacts			
Concern package of proposed changes will negatively impact on social/leisure activities	69	0	69
Concern package of proposed changes will negatively impact on faith groups (e.g. travelling to church) (general comment	4	1	5
Concern proposed increase to charge level will negatively impact on faith groups (e.g. travelling to church) (general c	5	0	5
Concern package of proposed changes will negatively impact disabled people (general comment)	42	5	47
Concern proposed increase to charge level will negatively impact disabled people (general comment)	22	2	24
Concern proposed changes to discounts will negatively impact disabled people (general comment)	14	1	15
Concern package of proposed changes will negatively impact elderly people (general comment)	46	2	48
Concern proposed increase to charge level will negatively impact elderly people (general comment)	19	1	20
Concern proposed changes to discounts will negatively impact elderly people (general comment)	6	1	7
Concern package of proposed changes will negatively impact vulnerable people (general comment)	17	2	19
Concern proposed increase to charge level will negatively impact vulnerable people (general comment)	8	1	9

Theme	Public responses only	Stakeholder responses only	All responses
Concern proposed changes to discounts will negatively impact vulnerable people (general comment)	13	0	13
Concern package of proposed changes will have a negative impact on those with protected characteristics (not captured elsewhere in codeframe) (general comment)	8	1	9
Concern proposed increase to charge level will have a negative impact on those with protected characteristics (not captured elsewhere in codeframe) (general comment)	2	0	2
Concern proposed changes to discounts will have a negative impact on those with protected characteristics (not captured elsewhere in codeframe) (general comment)	1	1	2
Package of proposed changes will have a positive impact on those with protected characteristics	7	0	7
Concern package of proposed changes will have other social impact (e.g. impact on charities / charity work)	9	5	14
Other impacts			
Package of proposed changes will have no impact to congestion/traffic levels/will not causes a reduction in the number of people travelling within the Congestion Charge zone	511	20	531
Package of proposed changes will have a positive impact on congestion/traffic levels/will reduce the number of people travelling within the Congestion Charge zone	81	3	84
Package of proposed changes will cause more congestion/traffic levels/increase it	50	3	53
Package of proposed changes will have no impact to air quality/emissions	132	1	133
Package of proposed changes will have a positive impact on air quality/emissions/will improve it	60	3	63
Package of proposed changes will make air quality/emissions/pollution worse	55	19	74
Package of proposed changes will have no impact to noise pollution	2	0	2
Proposed changed will have a positive impact on noise pollution/reduce it	9	0	9
Package of proposed changes will make noise pollution worse/create more noise	1	0	1
Package of proposed changes will have no impact to safety	6	1	7

Theme	Public responses only	Stakeholder responses only	All responses
Proposed changes will have a positive impact on safety issues/improve safety	25	2	27
Package of proposed changes will make safety issues worse	13	1	14
Concern Congestion Charge just pushes/will just push congestion and pollution outside of the zone	70	7	77
Concern Congestion Charge will push people out of London/cause people to move away/relocate	66	1	67
Concern about negative impact of electric vehicles on congestion/air quality/emissions	85	2	87
Concern about the impact on those who can't use public transport/active travel/are reliant on using cars/taxis (e.g. for work, due to health issues/disabilities, public transport not viable)	561	32	593
Concern proposed changes will encourage use of petrol/diesel cars / slow down transition to EVs	94	36	130
Suggestion about vehicle type e.g. tram-style/double decker electric/new routemasters/zero-emission buses/vehicle accessibility	152	0	152
Alternative mitigating suggestions			
Suggest more incentives for upgrading to electric vehicles (not captured elsewhere in codeframe)	129	22	151
Concern reduction in road space causes congestion (e.g. bus lanes, cycle lanes, Low Traffic Neighbourhoods (LTNs))	194	3	197
Suggest reducing/improving traffic calming measures/traffic light timings	110	3	113
Suggest increasing/improve green spaces	15	0	15
Suggest removing bus lanes/cycle lanes/increasing road space for cars/vehicles	68	2	70
Other specific suggestion to reduce congestion/pollution (e.g. needs to be more encouragement/investment in other green	164	16	180
Other comments			
Supportive/positive comment about the Mayor/Government/TfL	4	1	5
Criticism/negative comment about the Mayor/Government/TfL	458	8	466

Theme	Public responses only	Stakeholder responses only	All responses
More information/clarity needed/unable to find appropriate information to be able to comment	86	5	91
Query about how funds raised through Congestion Charge/other charging schemes are used	88	6	94
Unclear comment/unsure what referring to	10	0	10
Comment/comparison to other country/city	119	7	126
Reference to people with protected characteristics (e.g. age, disability, gender, ethnicity, religion)	154	5	159
Don't know/unsure/no opinion/unable to comment	7	0	7
Out of scope comment/unrelated to proposals and not captured elsewhere	159	1	160
Other (does not fit into codeframe)	192	22	214

Appendix D Stakeholder responses

Below are the 99 stakeholders who responded to the consultation:

- Angel Cars Wembley Limited
- ANT Education Ltd
- Association of International Courier & Express Services (AICES)
- Be.EV
- Blacklane (SME within CCZ)
- Bolt
- Brake
- Bright Sparks T.V & Film Ltd
- British Vehicle Rental and Leasing Association (BVRLA)
- Brooks Transport Services Ltd
- Business LDN
- Campaign for Better Transport
- Caroline Russel AM
- Centre for Net Zero
- Chauffeur and Executive Committee / LPHCA
- City of London Corporation
- City Temple URC
- Clean Cities Campaign
- Collaborative Mobility UK (CoMoUK)
- DHL
- DPD
- Electric London Campaign
- Electric Vehicle Association (EVA) England
- Elly Baker AM
- Enterprise Mobility
- Euro Fire Protection and Maintenance Service
- Evri Ltd.
- Exmoor Caviar & London Fine Foods Group
- FairCharge
- Fastened
- Federation of Master Builders
- Federation of Small Businesses
- Ford Motor Company
- Freedom for Drivers Foundation
- Future Transport London
- GMB Union
- Heathmore Estate Management
- Independent Garage Association
- Ingep Ltd
- Institute of Couriers
- Jo Hansford
- John Lewis Partnership
- K.Ruggins Construction
- Keith Prince AM
- Kippa BID
- Koinonia C of E Schools Federation
- LB Bexley

- LB Camden
- LB Hackney
- LB Hounslow
- LB Islington
- LB Lambeth
- LB Waltham Forest
- Letter to the Mayor from SMEs and Charities
- Liberal Democrats Group - London Assembly
- Logistics UK
- London Cycling Campaign
- London Living Streets
- London Travel Watch
- Louie French MP
- Lowndes Square One RTM Company Ltd
- Miniways Car Service
- Mums for Lungs
- My Urban Car Website
- Northaw & Cuffley Residents Association
- Open Letter from Charities & CICs
- Possible
- Putney Investment Ltd
- RebirthX Ltd
- Road Haulage Association
- Royal Borough of Kensington and Chelsea
- Royal Mail
- Ruskins Trees & Soil Biology Ltd
- Rutland Building
- Santis Global
- Society of Motor Manufacturers and Traders Ltd
- Splend
- Sustainable Urban Freight Association
- T&E (European Federation for Transport and Environment AISBL)
- TeraCode
- Tesco
- The AA
- The Brewery Logistics Group
- The Edible Bus Stop Ltd
- The Felix Project
- Thomas Turrell AM
- Toyota Motor Europe
- Trojan Energy Ltd
- Uber
- Uniserv Enterprises Ltd
- UPS
- V+V Interni Ltd
- Varmour
- Vida Facilities Limited
- Virgin Media O2
- Wandsworth Society
- Westminster City Council
- Zapmap Limited
- Zipcar

Appendix E About the consultation – main comments by sub-theme

Theme	Public responses only	Stakeholder responses only	All responses
Questions			
Survey was poor quality/design/presentation (general comment)	30	1	31
Questions were complicated/unclear/should have been clearer	49	1	50
Questions asked were irrelevant	31	0	31
Should have asked about other topic areas	57	3	60
Consultation/questions are biased/leading	378	4	382
Response options to questions were limited/should have been more response options	318	3	321
Issues with the survey not working correctly/reporting errors with the questions	124	0	124
Accessibility			
Promotion/advertising/awareness of consultation is poor/low/lacking	49	1	50
Suggest further consultation/engagement needed	32	11	43
Consultation/survey was difficult to find/access (general comment)	55	1	56
Disagree with registering before being able to complete the survey/should be able to give views without registering/sha	35	0	35
Suggest registration/login process should be simplified	36	0	36
Criticism of TfL website (general comment)	28	0	28
Criticism of survey inclusivity (general comment)	9	0	9
Other comments			

Theme	Public responses only	Stakeholder responses only	All responses
No issues/general positive comment about consultation/consultation material	4	1	5
Concern consultation responses will have no/little impact on TfL decisions/just a tickbox exercise	239	3	242
Comment/reference to other/previous consultations	19	1	20
Other comments about consultation/consultation material	38	2	40

F – List of Stakeholders contacted

Appendix F: List of stakeholders contacted

A large database of stakeholders were notified of the consultation in addition to the publicity activities we undertook. This included:

- **All 33 London local authorities** with notification to: Leaders, Chief Executives, Cabinet Leads, Councillors, Transport Leads and Communications Officers
- **Strategic London organisations:** Greater London Authority, London Councils, London Fire Brigade, Metropolitan Police, London Ambulance Service

MPs:

First name	Surname
Diane	Abbott
Rushanara	Ali
Rosena	Allin-Khan
Fleur	Anderson
James	Asser
Jas	Athwal
Gareth	Bacon
Calvin	Bailey
Danny	Beales
Apsana	Begum
Bob	Blackman
Rachel	Blake
Dawn	Butler
Ruth	Cadbury
Nesil	Caliskan
Bambos	Charalambous
Feryal	Clark
Ben	Coleman
Liam	Conlon
Jeremy	Corbyn
Deirdre	Costigan
Neil	Coyle
Stella	Creasy
Janet	Daby
Ed	Davey
Marsha	de Cordova
Bobby	Dean
Iain	Duncan Smith
Clive	Efford
Florence	Eshalomi
Miatta	Fahnbulleh
Peter	Fortune
Vicky	Foxcroft
Daniel	Francis

Louie	French
Barry	Gardiner
Georgia	Gould
Helen	Hayes
Meg	Hillier
Rupa	Huq
Natasha	Irons
Sarah	Jones
Paul	Kohler
Uma	Kumaran
David	Lammy
Julia	Lopez
Seema	Malhotra
Siobhain	McDonagh
John	McDonnell
Margaret	Mullane
James	Murray
Sarah	Olney
Abena	Oppong-Asare
Kate	Osamor
Matthew	Pennycook
Chris	Philp
David	Pinto-Duschinsky
Joe	Powell
Steve	Reed
Ellie	Reeves
Bell	Ribeiro-Addy
Andrew	Rosindell
Sarah	Sackman
Tulip	Siddiq
David	Simmonds
Andy	Slaughter
Keir	Starmer
Wes	Streeting
Luke	Taylor
Gareth	Thomas
Emily	Thornberry
Stephen	Timms
Dan	Tomlinson
Catherine	West
Munira	Wilson

Assembly Members:

First name	Surname
Marina	Ahmad
Shaun	Bailey

Elly	Baker
Emma	Best
Andrew	Boff
Hina	Bokhari
Anne	Clarke
Leonie	Cooper
Unmesh	Desai
Len	Duvall
Zoe	Garbett
Neil	Garratt
Alessandro	Georgiou
Susan	Hall
Krupesh	Hirani
Bassam	Mahfouz
Joanne	McCartney
Sem	Moema
Zack	Polanski
Keith	Prince
Gareth	Roberts
Caroline	Russell
James	Small-Edwards
Thomas	Turrell
Alex	Wilson

Stakeholder organisations:

Stakeholder type:	Stakeholder name:
Community	Abbey Children's Centre Nursery
Accessibility	Action and Rights for Disabled People in Newham
Accessibility	Action Disability Kensington & Chelsea
Accessibility	Action for hearing loss
Accessibility	Age UK
Accessibility	Asian People's Disability Alliance
Accessibility	Brent Deaf and Hearing Impaired Service
Accessibility	Brent Disability Forum
Accessibility	Brent Mencap
Accessibility	Brent Pensioner Forum
Accessibility	Brent Visual Impairment Service
Accessibility	Camden Chinese Community Centre Chinese Housebound Project
Accessibility	Camden Disability Action
Accessibility	Camden Learning Disabilities Service
Accessibility	Centre for Ageing Better
Accessibility	Cheviots Childrens Disability Service
Accessibility	Croydon Disability Forum

Accessibility	Deaf Access
Accessibility	Deaf Ethnic Women's Association (DEWA)
Accessibility	Dementia Voice
Accessibility	Disability Action Haringey
Accessibility	Disability Action In Islington
Accessibility	Disability Action in Islington (DAII)
Accessibility	Disability Action in the borough of Barnet (DabB)
Accessibility	Disability Advice Service
Accessibility	Disability Advice Service Lambeth
Accessibility	Disability BackUp
Accessibility	Disability Horizons (online magazine))
Accessibility	Disability Inspired Alliance
Accessibility	Disability Network Hounslow
Accessibility	Enfield Disability Action
Accessibility	Greenwich Association of Disabled People
Accessibility	Guide Dogs for the Blind Association
Accessibility	H&F Disability Forum
Accessibility	Haringey Wheelchair User Group
Accessibility	Harrow & Brent United Deaf Club
Accessibility	Harrow Association of Disabled People
Accessibility	Harrow Council - Learning Disabilities, Autism (all age) and Adult Mental Health
Accessibility	Havering Association for People with Disabilities (H.A.D)
Accessibility	Hillingdon Access & Mobility Forum
Accessibility	Hounslow Deaf Club
Accessibility	Hounslow Disability Forum
Accessibility	Inclusion London
Accessibility	Jewish Deaf Association
Accessibility	Joint Mobility Unit
Accessibility	Keeping Safe Sub Group / Power and Control Group (Learning disabilities)
Accessibility	Keeping Safe Sub Group / Power and Control Group (Learning disabilities)
Accessibility	Kent Association for the Blind
Accessibility	Learning Disabilities Partnership Board
Accessibility	London Sight Loss Councils
Accessibility	London Vision
Accessibility	London Vision Impairment Forum
Accessibility	Merton Children with Disabilities Team
Accessibility	Middlesex Association for the Blind
Accessibility	North West London wheelchair services user
Accessibility	RBKC Mobility Forum
Accessibility	Real - Local Voices and Accessible Transport Forum
Accessibility	Richmond Transport and Mobility Forum
Accessibility	RNIB

Accessibility	Southwark Disablement Association
Accessibility	The Disability Confident Action Group (DCAG)
Accessibility	Tower Hamlets Accessibility Forum
Accessibility	Transport for All
Accessibility	Transport for All Islington
Accessibility	Waltham Forest Disability Resource Centre
Accessibility	Wandsworth Learning Disabilities Network
Accessibility	Wandsworth Mobility Forum
Accessibility	Westminster City Council, Learning Disability Partnership
Accessibility	Winvisible (Women With Visible and Invisible Disabilities)
Business	BusinessLDN
Business	Confederation of British Industry
Business	Heart of London Business Alliance
Business	LCCI
Business	The Federation of Small Businesses
Business	Canary Wharf Group
Car Clubs	BVRLA
Car Clubs	CoMoUK
Car Clubs	Zipcar
Community	Abbey Children's Centre Nursery
Community	About Me Care & Support
Community	AccessAble
Community	Action Space
Community	Active Plus
Community	Adult Social Care Commissioning - Involve team
Community	Advocacy for All
Community	Advocacy for All / Speak up Sutton
Community	Advocacy in Greenwich
Community	Advocacy Project
Community	Age Concern Chiswick
Community	Age Concern Orpington and District
Community	Age UK Barnet
Community	Age UK Bexley
Community	Age UK Brent, Harrow & Hillingdon
Community	Age UK Bromley & Greenwich
Community	Age UK Camden
Community	Age UK City of London
Community	Age UK Croydon
Community	Age UK Ealing
Community	Age UK East London
Community	Age UK Enfield
Community	Age UK Hammersmith & Fulham
Community	Age UK Hounslow
Community	Age UK Islington
Community	Age UK Kensington & Chelsea

Community	Age UK Lambeth
Community	Age UK Lewisham & Southwark
Community	Age UK Merton
Community	Age UK Redbridge, Barking & Dagenham and Havering
Community	Age UK Richmond upon Thames
Community	Age UK Sutton
Community	Age UK Waltham Forest
Community	Age UK Wandsworth
Community	Age UK Westminster
Community	Ageing Better in Camden
Community	Alzheimer's Society for Lambeth and Southwark
Community	Alzheimer's Society Croydon
Community	Alzheimer's Society Dementia Support Service Wandsworth
Community	Aphasia Reconnect
Community	Arnold House — Leonard Cheshire Disability
Community	Aspire Wellbeing
Community	B&D Access Group & IDDP
Community	B&D Children's Centre
Community	Balham Resource Centre
Community	Barnet Lone Parent Centre
Community	Barnet Parent Carer Forum
Community	Barnet Torch Fellowship Group
Community	Bexley Deaf Centre
Community	Bexley Dodgers Boccia Club
Community	Bexley Down's Syndrome Group
Community	Bexley Mencap
Community	Bexley Snap
Community	Bexley Voluntary Service Council
Community	Bexleyheath & District Club for the Disabled
Community	Beyond Sight Loss
Community	Biggin Hill Community Care Association
Community	Bikeworks
Community	Blenheim - Insight
Community	BlindAid
Community	Breathe Easy Brent (British Lung Foundation)
Community	Brent Gateway Partnership
Community	Brent Irish Advisory Service
Community	Brent MIND
Community	Brent Mind
Community	British Blind Sport
Community	British Disabled Angling Association
Community	British Heart Foundation
Community	Bromley and Lewisham Mind
Community	Bromley Experts by Experience CIC
Community	Bromley Living Streets Group

Community	Bromley Mencap
Community	Bromley Mobility Forum (XbyX Bromley)
Community	Bromley Voice
Community	Bromley Well
Community	Bromley, Lewisham and Greenwich Mind
Community	Buddies for All
Community	Camden Carers' Group and Former Carers' Group
Community	Camden Carers' Service
Community	Camden People First
Community	Camden Society Choices
Community	Carers Hub
Community	Carers' Hub (Carers of Barking and Dagenham)
Community	Castlehaven Community Association
Community	Celebrations Theatrical Group
Community	Centre 404
Community	Certitude Travel Buddies
Community	Chainreaction
Community	Choice in Hackney
Community	Choice Support
Community	City Connections Service (Part of Age UK East London)
Community	Community Action Sutton
Community	Community Connex, formerly Harrow Mencap
Community	Community Navigation Network
Community	Conquest Art
Community	Creative Support
Community	Croydon Mencap
Community	Croydon People First
Community	Culture Access
Community	Cypriot Elderly and Disabled Group (Enfield)
Community	DASH
Community	Dovetail Community Outreach
Community	Ealing Centre for Independent Living
Community	Elders Voice
Community	Elfrida Rathbone Camden
Community	Fast Minds
Community	Fight for Sight
Community	Foodbank Wandsworth
Community	Fountains Mill Young People's Centre
Community	Friends of African Caribbean Carers and Sufferers of Dementia
Community	Gateway Club - Orpington and Bromley
Community	Greater London Forum for Older People
Community	Greenwich Mums
Community	H&F Local and Vocal Hub
Community	HACS

Community	Haringey Association for Independent Living (HAIL)
Community	Haringey Mencap
Community	Haringey Over 50's Forum
Community	Harrow Samaritans
Community	Havering over 50s Forum
Community	HBC Community Centre
Community	Heatham House Youth Centre
Community	Highbury Roundhouse Community Centre
Community	Hilldrop Community Centre
Community	Hillingdon Asian Womens Group
Community	Hillingdon Autistic Care and Support
Community	Hillingdon Dads (SEND Family Support)
Community	Hillingdon Somali Women's Group
Community	Hillside Clubhouse
Community	Horizon
Community	ICEC Foodbank
Community	Inclusion Barnet
Community	Independent Living Agency
Community	Isleworth Explorers Club
Community	Islington Parents Carers Forum
Community	Jags Foundation CIC
Community	Jami (Jewish Association for Mental Health)
Community	Just Say Parents Forum
Community	KAG Advocacy
Community	Katherine Low Settlement
Community	Kensington & Chelsea Forum for Older Residents
Community	Kensington and Chelsea Forum
Community	Kensington Residents Group
Community	Kilburn Older Voices Exchange (KOVE)
Community	Kingston Association for the Blind
Community	Kingston Carers Network
Community	Kingston Centre for Independent Living
Community	Kingston Mencap
Community	KOVE - Kilburn Older Voices Exchange
Community	Lambeth Dementia Alliance
Community	LDN (formerly Westminster Society)
Community	LDN 4U Camden
Community	LDN 4U RBKC
Community	LDN 4U Westminster
Community	Leonard Cheshire Community Support
Community	Lewisham Nexus Service
Community	Limited Edition
Community	Linden Hall Community Centre
Community	London Recumbents
Community	Mencap
Community	Merton Centre for Independent Living

Community	Merton Senior Citizens Forum
Community	Merton Vision
Community	Mind Croydon
Community	Mobility Services
Community	N Able Network
Community	NAS Lambeth Branch
Community	National Autistic Society, Merton Group
Community	National Childbirth Trust (NCT) - Kingston
Community	NCT- Barnet
Community	NCT- Beckenham
Community	NCT- Bexley
Community	NCT- Brixton
Community	NCT- Bromley & Chislehurst
Community	NCT- Chiswick & Hammersmith
Community	NCT- Clapham
Community	NCT- Croydon
Community	NCT- Crystal Palace
Community	NCT- Ealing
Community	NCT- Enfield
Community	NCT- Greenwich
Community	NCT- Hampstead & Camden
Community	NCT- Haringey
Community	NCT- Harrow
Community	NCT- Havering
Community	NCT- Hillingdon
Community	NCT- Islington
Community	NCT- Orpington
Community	NCT- RB K&C
Community	NCT- Streatham
Community	NCT- Tottenham
Community	Oakleigh School and Early Learning Centre
Community	One Place East
Community	Parents Forum Resource Group
Community	Park Avenue Disability Resource Centre
Community	Queen Elizabeth Foundation Mobility Services
Community	Rainbow Trust Children's Charity
Community	Rainham ROYALS Youth Centre
Community	Real - Real DPO Ltd
Community	Redbridge Disability Association
Community	Remploy
Community	Respond
Community	Rethink advocacy
Community	Richard Cloudesley school - for children with physical and learning disabilities
Community	Richmond AID
Community	Richmond MENCAP
Community	Richmond Upon Thames Forum for Older People

Community	Ruils
Community	Ruislip Young People's Centre
Community	Safety Net - People First
Community	Scope
Community	Sensory Needs Forum
Community	Service User Network (SUN)
Community	Share Community Ltd
Community	Sidcup Youth Centre
Community	South East London Vision
Community	Speak Out In Hounslow
Community	St Josephs Pastoral Centre
Community	Sutton Carers
Community	Sutton Mencap
Community	Sutton Parent Carer Forum
Community	Sutton South Hello
Community	Sutton Vision
Community	The Elfrida Society
Community	The Enfield Branch of the National Autistic Society
Community	The Kingswood Centre
Community	The Purple Penguin Club
Community	The Royal Association of Deaf People (RAD)
Community	The Sulgrave Youth Club
Community	Thomas Pocklington Trust
Community	Tower Hamlets Mental Health Partnership Group / Community Options Involvement Network
Community	Visually Impaired Camden
Community	Voices, Willma community
Community	W9 Empowerment Group
Community	Waltham Forest Mobility Forum
Community	Wandsworth and Westminster Mind
Community	Wandsworth Carers Centre
Community	Wandsworth Community Empowerment Network (WCEN)
Community	Wandsworth Community Transport (WCT)
Community	Wandsworth Cycling Campaign
Community	Wandsworth Older People's Forum
Community	We Are 336 (Lambeth Accord)
Community	We are W11
Community	West Drayton Young Peoples Centre
Community	West Hampstead Parents Group
Community	Westminster Cycling Campaign
Community	Westminster Senior Citizens Forum
Community	Westside Young People Centre
Community	Wheels for Wellbeing
Community	Whitehorse Youth Centre
Community	Willesden District Scouts

Community	Wingate and Finchley FC Disabled Fans' Forum
Community	Young Brent Foundation
Community	Youth Action Diversity Trust
Community	Youth Engagement Solutions Ltd
Community	Zebra Cross Childrens' Club
Driving	AA
Freight	AICES
Freight	Amazon
Freight	DHL
Freight	DPD
Freight	Evri
Freight	Hived
Freight	Institute of Couriers
Freight	John Lewis and Waitrose
Freight	Logistics UK
Freight	Ocado
Freight	Royal Mail
Freight	Sainsburys
Freight	SMMT
Freight	SUFTA
Freight	Tesco
Freight	The Brewery Logistics Group
Freight	The Road Haulage Association
Freight	UPS
Freight	XPO
Healthy Streets	Living Streets
Healthy Streets	London Cycling Campaign
Healthy Streets	Sustrans
Sustainability	Clean Air Fund
Sustainability	Clean Cities
Sustainability	Friends of the Earth
Sustainability	Global Action Plan
Sustainability	Green Alliance
Sustainability	Healthy Air Coalition
Sustainability	Impact on Urban Health
Sustainability	Mums for Lungs
Sustainability	Possible
Sustainability	The Aldersgate Group
Taxis and Private Hire Vehicle	ADCU
Taxis and Private Hire Vehicle	Addison Lee
Taxis and Private Hire Vehicle	Bolt
Taxis and Private Hire Vehicle	Chauffeur and Executive Committee
Taxis and Private Hire Vehicle	FreeNow
Taxis and Private Hire Vehicle	GMB
Taxis and Private Hire Vehicle	LCDC
Taxis and Private Hire Vehicle	LPHCA
Taxis and Private Hire Vehicle	LTDA

Taxis and Private Hire Vehicle	Private Hire Board
Taxis and Private Hire Vehicle	RMT
Taxis and Private Hire Vehicle	Uber
Taxis and Private Hire Vehicle	UCG
Taxis and Private Hire Vehicle	Unite
Vision Zero	20s Plenty
Vision Zero	Action Vision Zero

Appendix G – Summaries of stakeholder responses

Contents:

1. Political representatives and organisations
2. Trade bodies and representative groups
3. Campaign Groups
4. Travel Watchdog
5. Business and Industry organisations
6. Charities and community groups
7. Letters received on behalf of multiple stakeholders

Stakeholder response summaries

Please note, the following sections provide a summary of the stakeholder responses we received during the consultation period. While we make every effort to faithfully summarise the main issues raised by each stakeholder, it is not always possible to capture all the issues raised within a stakeholder's response.

1. Political representatives and organisations

City of London Corporation	The City of London Corporation supports the increase of the Congestion Charge. They support the reduction of the CVD due to the high amount of EVs in the City, but suggest a complete removal of the CVD by 2030, rather than the proposed reduction. They also support the reduction of the CVD for vans and HGVs. They suggest that small businesses, sole traders and charities be given a higher CVD for their commercial vehicles, or be given an extension to the discount beyond 2030. They support the changes to the residents' discount but suggest that the retention of the residents' discount be attached to the vehicle rather than the resident, to incentivise EV uptake. They also support changes being able to be made to the Congestion Charge without consultation so charges can be increased in line with Tube and rail fares.
LB Bexley	LB Bexley opposes an increase in the congestion charge as it feels it would negatively impact its residents who are already struggling financially. They are also concerned with the changes to the CVD and believe that they are premature.
LB Camden	LB Camden supports proposal A. They support proposal B but suggest phasing out the CVD more gradually for car clubs and freight vehicles owned by SMEs. They support Proposal C but have some reservations as they believe it could have negative impacts on low-income and disabled residents who do not own an EV, particularly those who do not qualify for a blue badge. They also believe it will have negative impacts on residents who own and operate PHVs. They propose a more gradual change in the Residents' discount.
LB Hackney	LB Hackney note that car clubs support car-free lifestyles and that charging them full price for the congestion charge risks making them less affordable and less accessible. They also highlight that the reduction in the CVD will create a barrier to electrification for car clubs, and may make car clubs more expensive for users. They recommend that there is a 100% CVD for e-car club vehicles.
LB Hounslow	LB Hounslow raise concerns that the proposals treat car club vehicles the same as privately-owned vehicles, and that this might lead to car club operators reducing the number of vehicles in their fleets and reducing the percentage of EVs in their fleets. They are also concerned that car club operators may raise

	prices. They request detail on the extent of research we have conducted so they can understand the potential impact on car clubs. They request data on car club trips.
LB Islington	LB Islington raise concerns that increasing the congestion charge will disproportionately affect lower-income drivers, vulnerable drivers and small businesses. They ask that we explore ways to mitigate these impacts. They raise concerns that removing the residents' discount for new residents is unfair. They raise concerns about low-income residents, particularly those living in social housing who do not have the opportunity to choose where they live. They advocate for maintaining the residents' discount for all residents. They also raise concerns about the financial impact this will have on the council fleet. They ask that we expand the eligibility for 100% discount for some council vehicles to include a broader range of vehicles. They also recommend that we engage with car club companies.
LB Lambeth	LB Lambeth broadly support the proposed changes, but they do advocate for targeted support for SMEs and charities. They propose maintaining a 100% discount for electric vans and HGVs used by these organisations until 2030. They also encourage us to closely monitor the uptake and usage of EVs in the CCZ. They also recommend introducing a greater discount for back-to-base car clubs, introducing a greater charge for oversized vehicles such as SUVs, and extending the operating hours of the CCZ to include weekday evenings. They also propose yearly or bi-yearly reviews of discounts to ensure they are incentivising and not undermining the creation of a healthier urban environment.
LB Waltham Forest	LB Waltham Forest note that we should ensure EV infrastructure is accessible and equitably distributed. They raise concerns about the impact of the increased cost on car clubs and recommend that we introduce a reduced congestion charge for car vehicles. They support the EV discount but note that active travel and public transport must remain the primary focus. They believe that the changes to the residents' discount will have limited impact and suggest instead that we consider restricting discounts to Blue Badge holders only.
Royal Borough of Kensington and Chelsea	The Royal Borough of Kensington and Chelsea object to the proposals and raise concerns that they will hamper efforts to move to electric vehicles. They also raise concerns the public awareness of the changes to the CVD is not high enough, particularly among those considering switching to an electric vehicle. They query whether modelling was done for different percentage discounts.

Westminster City Council	Westminster Council raise that a 20% increase is a significant increase in cost for individuals and small businesses. They welcome the proposal to allow us to increase the charge annually in line with inflation. They suggest a 100% CVD for vans and HGVs until 2027, tailing off thereafter, due to these vehicles being slower to electrify. They also suggest a 100% CVD for charities and SMEs. They suggest phasing out the CVD at the end of this year completely due to the rising number of EVs, and they do not support Phase 2 of the CVD. They suggest further proposals to encourage Londoners to use smaller vehicles (e.g. quadricycles) rather than larger. They support the Residents' discount changing to only be available for EVs. They recommend an equivalent discount for zero tailpipe emission car club vehicles. They raise concerns that allowing grandparent rights for existing residents may create a two tier system. They recommend that after 2030, residents remain eligible until they replace their vehicle, at which point they will only be eligible if their new vehicle is a zero emission at tailpipe model. They raise concerns that residents who cannot use AutoPay will be disadvantaged by the discounts only being available through AutoPay. They also oppose the proposal of a shorter consultation window and the proposal of some changes being enforceable without consultation.

Caroline Russell AM	Caroline Russell AM supports the increase in cost as she views it as unfair that public transport fares have risen while the Congestion Charge has not over the past years. Caroline Russell AM also supports the ability for the charge to be raised without consultation, by the same percentage amount as tube and TfL railway fares, or an annual inflationary rate. Caroline Russell AM also supports making further changes to reduce incentives to drive, such as extending the times that the CCZ operates, a higher charge for heavier vehicles, and proportionate charging for motorcycles. Caroline Russell AM believes more needs to be done to encourage SMEs to switch to cleaner vehicles and to use cargo bikes. Caroline Russell AM suggests the Mayor introduce a scrappage scheme for older vans to aid SMEs in switching to EVs. Caroline Russell AM also suggests using the GLA Green Finance Fund to create a scheme to help SMEs transition. Caroline Russell AM expresses some concern at the continuing residents' discount for EVs, as they still contribute to congestion. Caroline Russell AM also expresses concern about the continuing discount for residents who already have it. Caroline Russell AM suggests that we should consider a factor for the weight and size of vehicles to discourage the use of large vehicles at the least. Caroline Russell AM believes we should be readying Londoners for the reality of road user charging, even for residents. Caroline Russell AM also suggests financial incentives for walking, wheeling and cycling.
Elly Baker AM	Elly Baker AM, on behalf of the Labour Group, supports the increase in the Congestion Charge. Elly Baker AM raises concerns about the Auto Pay system and whether it may confuse drivers. Elly Baker AM says there need to be clear communications about Auto Pay. Elly Baker AM raises concerns that a reduction in the CVD will not have the desired effect and suggests that vans and SMEs should retain a 100% discount. Baker also suggests that 100% CVD should be maintained for car clubs. Elly Baker AM also asks TfL to obtain more detailed evidence and modelling from PHV operators and carry out further engagement before finalising proposals in this area. Elly Baker AM states that the Labour Group strongly oppose a reduction in the minimum consultation period and oppose any ability for TfL to make routine changes without consultation.
Keith Prince AM	Keith Prince AM states that the proposed charge increase would be beyond inflation. Keith Prince AM also raises concerns about raising the price at a time when Londoners have had other RUC introduced recently. Keith Prince AM also raises issues with the quality of London's roads.
Liberal Democrats Group - London Assembly	The Liberal Democrat Group raise concerns that the reduction in the CVD may negatively impact the switch to cleaner vehicles and therefore have negative impacts on London's economy and health. They suggest exploring other avenues, such as creating schemes to encourage the uptake of alternative forms

	of transport. They also raise concerns that these proposals will disproportionately impact those on lower incomes.
Louie French MP	Louie French MP opposes the increase and claims it is a tax on working people. Louie French MP highlights that there are many categories of people who rely on a vehicle to travel into central London. Louie French MP raises concerns that, alongside other RUCs and TUCs, including the Dart charge, driving is becoming very expensive. Louie French MP expresses particular concern for those living in South East London and expresses that Bexley does not receive enough funding and maintenance in return.
Thomas Turrell AM	Thomas Turrell AM notes that the increase in the congestion charge between its inception and now has outpaced inflation. Thomas Turrell AM also draws attention to other road charges that exist alongside the congestion charge. Thomas Turrell AM also claims the quality of London's TfL roads has worsened under the Mayor and road space has been reduced. Thomas Turrell AM opposes any increase.

2. Trade bodies and representative groups

Association of International Courier & Express Services (AICES)	AICES are concerned about the impact of the proposals on the freight and logistics sector. They request that zero-emission vans and HGVs continue to receive a 100% discount as they are essential and companies may be discouraged from switching to electric vehicles otherwise. They suggest a combination of DVLA data and FORS accreditation to identify these vehicles. They raise concerns about costs being passed onto businesses and consumers, therefore harming London's business landscape. They express concern about an annual review of charges due to the instability it would cause businesses. They request multi-year certainty on changes to charge levels. They also request that we work with the logistics sector and that we avoid creating policies that create financial disincentives for operators.
British Vehicle Rental and Leasing Association (BVRLA)	The BVRLA expresses concerns that the proposed increase to the charge level will negatively impact car clubs. They recommend an exemption for shared mobility. They express concerns that the lessened CVD will discourage people and fleets from switching to EVs. They are concerned with the higher operating costs of EVs. They recommend that all electric shared mobility vehicles should receive 100% CVD. They also recommend 100 per cent CVD for all electric vans and HGVs. They state that continuing the Residents' Discount unfairly penalises those who have given up their vehicle and the shared mobility companies that now provide vehicle services for them. They recommend that we offer shared mobility vehicles the same discount as residents.
Business LDN	Business LDN says that the price rise is a significant amount for businesses in a difficult economic time. They recommend that, in the future, we review the price regularly to ensure gradual raises. They recommend we do an impact assessment analysing the CVD's London-wide air quality impact. They note that not enough PHVs or vans have yet made the switch to EVs. They state that it is unfair that the current system is unable to distinguish between essential and non-essential trips. They say that ensuring a level playing field across commercial vehicles is essential. They argue that the removal of the CVD is not being

	supported by the measures that were set out alongside it when it was originally planned. They recommend that we keep the 100% CVD or provide a higher, time-limited discount to commercial fleets to support transition. They also recommend that, if the changes go ahead, we allow grandfather rights for the CVD with a phased-out approach.
Chauffeur and Executive Committee / LPHCA	The respondent opposes charging PHVs and raises concerns that this discourages people from using PHVs as a form of public transport. They highlight the importance of PHVs for disabled people and key workers who work during unsociable hours.
Electric Vehicle Association (EVA) England	The Electric Vehicle Association broadly agree with the proposals but express concern at the lowered CVD for electric vans and HGVs due to their slow uptake. They recommend that the CVD for electric vans and HGVs remains at 100% until 2030 for SMEs and charities. The EVA support the residents' discount only applying to EVs but recommend that the 90% discount should also apply to electric car club vehicles.
Federation of Master Builders	The Federation of Master Builders express their concern about the increase to the charge due to the possibility of it discouraging people from working in London. They also express concerns about all of London's road user charges being passed on to consumers. They request discounts and exemptions on RUC for SME construction companies. They propose an exemption for vans used for building work.
Federation of Small Businesses	The Federation of Small Businesses expresses concerns about the financial burden on businesses, the possibility that some may be unaware or unable to register for AutoPay in time, the operational impact on small businesses, the risk to investment in green transport, and the administrative complexity of payment systems. They oppose proposal B and raise concerns about administrative complications. They also oppose proposal A, asking that we stagger the charges over three years.
GMB Union	GMB express concern about the financial impact the new CVD may have on workers, particularly PHV drivers, small businesses/sole traders, courier and delivery workers, and essential workers. They specifically raise concerns about its impact on disabled people, claiming the policy fails to meet the Public Sector Equality Duty. They claim that this charge will lead to more PHV drivers operating outside the Congestion Charge Zone, therefore creating a lack of PHVs for disabled people in the zone who need to use them. They also claim that our IIA is flawed and does not properly assess the impacts on disabled people. They claim that this means the policy is not legally compliant. They request that we reinstate the 100% CVD for PHV drivers, couriers and essential workers and that vehicles that do not meet this criteria should be charged £20. They also request that we broaden and

	clarify exemptions for essential workers, that any future changes happen with a phased approach, that more support is provided for EVs, that more comprehensive modelling is carried out, and that we ensure out communication is transparent. Finally, they also request that vehicles registered by 31 December 2025 should receive grandparent rights.
Independent Garage Association	The Independent Garage Association expresses concern that these proposals would push up vehicle repairs and services for London, make margins tight for micro-businesses, and weaken road safety due to routine maintenance being avoided due to high costs. They propose that there be no increase to the charge, with any future price raises capped to the Consumer Price Index unless a consultation is taken, that a 'Service and Repair Exemption' is implemented for EV drivers, and that the full 10 week consultation period remains, with the 5 week period for minor variations.
Institute of Couriers	The Institute of Couriers oppose Proposal A as couriers have no choice but to enter the congestion zone. They believe the cost will be passed onto customers with no impact on congestion. They support proposal B and note that it is vital that financial support for EVs remains in place.
Logistics UK	Logistics UK believe that proposal A will have no positive impact as it will have no impact on the levels of commercial vehicles in the CCZ. They ask us to remove the restrictions imposed by the London Lorry Control Scheme. They say the increase in cost will be inflationary due to operators passing costs on to customers, therefore making services more expensive. They also believe that proposal B will have no positive impact. They highlight that the electric van market is struggling to expand and they believe that changing the CVD will be an extra burden. They do not believe that the market is mature enough yet for the discount to be decreased and believe that the decrease will be a deterrent to the uptake of EVs. They request that we consider the impact these charges will have on residents and businesses. They believe that there was not sufficient attention given to the proposal to remove the public consultation for future increases due to the consultation primarily focusing on Proposals A, B and C. They oppose this proposal.
Road Haulage Association	The Road Haulage Association notes the significance of the Congestion Charge zone for road haulage. The RHA opposes Proposal A and believe that the congestion charge should remain at the current level for HGVs. They express concerns that increasing the charge will undermine the competitiveness and viability of hauliers and coach operators in London. They state that haulage operators have low operating margins and that the cost of operating a HGV had been rising while freight volumes have dropped.

	The RHA opposes Proposal B as they believe it is too early to withdraw the CVD for HGVs. They draw attention to the small number of electric HGVs on UK roads. They request clarity on whether the previous discount still applies to coaches or not. The RHA ask that we keep the current charge for HGVs and coaches, keep the 100% CVD for electric HGVs, vans and coaches, and that we convene a stakeholder working group to discuss the Congestion Charge and the London Lorry Control Scheme.
Society of Motor Manufacturers and Traders Ltd	The Society of Motor Manufacturers and Traders do not oppose Proposal A but do oppose the charge rising with inflation for all vehicles. They oppose making annual changes without consultation and impact analysis. They note that a higher charge each year will not reduce the number of journeys by commercial vehicles. They raise concerns that those with accessibility needs will be adversely affected by the rising charge. They also raise concerns that a higher cost for commercial vehicles will be passed on to the consumer and will negatively impact smaller operators. They ask that no increases to the congestion charge are made without consultation and full impact analysis. They oppose Proposal B and request a continuing 100% CVD for electric commercial vehicles. They raise concerns about the total cost of ownership of electric fleet vehicles and the small number of them in fleets, and consider the changes to the CVD to be premature. They suggest that removing discounts like the CVD will harm our ability to reach environmental targets by discouraging the uptake of electric vehicles. They state that electric vehicles do not contribute significantly to congestion as there are so few of them. They also express concern that drivers must be registered for AutoPay to receive the discount, as they suggest it is unfair for those who do not regularly travel into London. They suggest a 100% CVD for cars, vans, minibuses and utility vehicles until 2035, and HGVs and coaches until 2040. They also suggest that discounts should be applicable regardless of payment method. They also express concern that the changes to the CVD will discourage PHV drivers from using an electric car. They suggest that current residents should only receive the Residents' discount until the same dates as their proposed CVD end dates. They also suggest that the residents' discount should apply to zero emission commercial vehicles registered to businesses within the CCZ. They ask that greater consideration is taken with the timing of consultations, using a metric based on working days to ensure 6 weeks of working days are available to respond as a minimum. They also ask that a longer consultation period is provided where data collection and a technical response is required. They suggest that a congestion charge should be a last resort after other traffic management methods have been applied. They suggest other methods of reducing congestion: more bus lanes, amending the London Lorry Control Scheme, greater kerbside management, encourage deliveries outside of peak

	hours, consolidated deliveries, further development of traffic management systems, high occupancy vehicle lanes, and park and ride services outside of the CCZ.
Sustainable Urban Freight Association	The Sustainable Urban Freight Association respond specifically to Proposal B. They support the proposal to continue the CVD. They also support the proposal to eventually reduce the CVD for electric vans and HGVs, but believe that this is coming too soon and will harm environmental goals. They suggest that this will result in more diesel vehicles on the road due to the removal of an incentive to go electric, in an area which has already been slow to electrify. They raise concerns about other major barriers to EV adoption (e.g. upfront cost, size of investment, small second hand market, cost of leasing, infrastructure requirements, lower mileage) already discouraging the switch. They note that these barriers are particularly hard to overcome for smaller businesses. They also note that many businesses are making the switch, but that replacing a whole fleet takes time. They also highlight that not all freight is suitable to be carried by cargo bike. They ask that the reduction in the CVD for electric vans and HGVs does not take place until the market is more mature.

3. Campaign Groups

Campaign for Better Transport	Campaign for Better Transport express concern about unintended negative impacts for those who must drive. They express concern that the higher charge will hit low-income drivers and those without an alternative to using a car hardest. They oppose the rate being a flat rate. They suggest that the new CVD will weaken the financial incentive to switch to an EV. They express concern that ending the residents' discount for non-EVs will have significant financial impact on residents who depend on a car and cannot afford an EV. They recommend that we investigate a Pay-as-You-Drive model. They also recommend we provide targeted support for low-income households, disabled drivers and carers (e.g. grants, scrappage schemes, etc.), and provide assistance with switching to EVs. They suggest that we ringfence revenue from the Congestion Charge to be used for improving public transport, road safety and active travel. They also suggest that we regularly review the social and environmental impacts of changes.
Clean Cities Campaign	Clean Cities supports the rise in the Congestion Charge and supports the idea of linking further increases to public transport fares in London. They support the difference in discount levels between freight vehicles and private cars but express concern that the lower discount may impact the uptake of electric vans by SMEs and charities. They

	recommend that electric vans, quadricycles and HGVs run by SMEs and charities should receive 100% CVD until 2030, then reducing to 50%. They also recommend that the CVD discount for electric cars should have an end date. Clean Cities recommends that the residents' discount should only apply to electric cars from 2035, even for those with grandparent rights. They also recommend that the electric car club vehicles should receive a 90% discount. They also suggest that the Congestion Charge should apply during the weekday until at least 9pm, that the cost should be higher for large SUVs, and that there should be continued support for PHV drivers to electrify.
Electric London Coalition	Electric London believe that Proposal B will have negative impacts on London's air, drivers, and future investment in EV infrastructure and fleets. They express concern that higher costs will impact EV adoption and those who have already chosen to drive an EV, at a time where drivers and communities are facing higher costs in general. They state that the CVD has had great air quality benefits, especially outside of the CCZ. They express concern about low fleet conversion to EVs, particularly due to low upfront cost. They raise concerns that the new CVD will remove the financial incentive to switch to an EV. They also state that wider planned policies that were planned alongside the CVD's end have not been introduced.
FairCharge	FairCharge raise concerns that the new CVD will have a negative impact on air quality, and that many PHV drivers will switch back to diesel vehicles. They suggest that there will always be congestion in London, so limiting pollution is the most important step. They suggest limiting the number of PHV drivers coming from the Midlands.
Freedom for Drivers Foundation	The Freedom for Drivers Foundation states that the congestion charge has not reduced congestion, that these proposals will not have any effect, and that the charge is a tax on motorists. They ask for its removal.
Future Transport London	Future Transport London support the proposals but suggest that the payment should be based on distance driven, rather than being one single charge per day.

London Cycling Campaign	The London Cycling Campaign advocate for London to move to a system of smart RUC, perhaps based on journey metrics. They call for demand side rather than supply side charging. They highlight the costs that cars cause externally (e.g. the cost of air pollution and KSIs). They suggest the use of a single SRUC app to charge users in areas of high demand and high pollution, with potential for differential charging for taxis/PHVs. They suggest that the charge should rise in line with inflation. They note that private EVs need to be discouraged from travelling and they support extending the charge to these vehicles, but do not support extending it to shared-use EVs. They believe shared-use EVs should benefit from the same discount as resident's EVs. They support the continuation of discounts for electric vans but suggest steps taken to encourage the uptake of cargo bikes and last-mile consolidation centres too. They suggest that the charge should be in place until 9pm on weekdays. They also suggest that the continuation of the residents' discount for currently existing residents should be reassessed as it may incentivise buying an ICE vehicle.
London Living Streets	London Living Streets supports the increase in the charge but propose that it should match inflation since 2020. They propose that there is an annual review of the number of discounted vehicles entering the zone, and that discounts be reassessed if this number is higher than projected. They also believe that the residents' discount is excessive and should be reduced significantly between now and 2030 (with the exception of for disabled residents), with it reaching no discount over time. They support the proposal to tie the increase in the charge to public transport fares as part of the Mayor's Guidance. They believe that the congestion charge should be applicable in evenings, until 11pm. They suggest the introduction of a ZEZ within the CCZ and pay-per-mile charging through the rest of London. They also suggest an increased charge for SUVs.
Mums for Lungs	Mums for Lungs broadly agree with the proposals. They support the increased charge and the proposed changes to the Mayoral Guidance, but recommend a more significant increase in the cost due to the higher external cost of driving compared to public transport. They propose a more nuanced approach to charging, with the most polluting and dangerous vehicles charged the most. They suggest an SUV surcharge. They raise concerns that the proposed CVD does not encourage movement towards EVs. They suggest 100% CVD for vans, quadricycles and HGVs run by SMEs and charities until 2030. They suggest that the charge should be extended to be operational 24/7.

Possible	Possible support the increase in the charge and the proposal to tie future increases to public transport fares. They support extending the CVD but suggest that necessary vehicles should receive a higher discount. They suggest that the CVD should have an end date of 2035. They support extending the charge into the evening. They also suggest tiered charging which charges SUVs more.

4. Travel Watchdog

London Travel Watch	London Travel Watch state that revenues raised need to be directed into improving public transport and that mitigations need to be provided for those most affected by the increase. They also note that any changes to the charge and any discounts and mitigations should be communicated clearly. They ask that we proactively engage with groups highlighted in the IIA. They ask that we set out how much we expect to raise, provide detail on how we intend to use the money, and indicate how we plan to prioritise the use of released road capacity before we make a decision on raising the charge. They also ask that the increased charge come into effect in March instead of January due to January being a financially difficult time. They note that they would like to see the new Mayoral Guidance proposed used to implement a more strategic approach to the charge. They encourage consultations for significant proposals to be more than 6 weeks long. They support the changes to the CVD but are concerned that discounted charges can only be paid through AutoPay. They ask that the option to call the call centres is widely communicated. They express concern for lower income residents and disabled people who do not qualify for a blue badge in regards to the changes to the Residents' discount. They ask for reassurance that support is in place and ask for us to monitor the impact.

5. Business and Industry organisations

Angel Cars Wembley Limited.	Angel Cars Wembley Limited oppose the increase to the Congestion Charge as it will impact their business and may lead them to close. They question why buses and black taxis are exempt while PHVs are not. They are concerned about the impact of rising RUC costs on businesses and the general public. They believe these policies disproportionately affect those with limited finances. They request these concerns be addressed and any support for local businesses be highlighted.

ANT Education Ltd	ANT Education Ltd. state that continuing to incentivise electric vehicles is important. They request that the charge for electric cars remains at 0. They praise the air quality in London and encourage us to keep that trajectory. They also encourage us to keep motorbikes and scooters from paying the congestion charge.
Be.EV (charge point operator)	Be.EV express concerns about the changes to the CVD, believing they could stall the transition to EVs and negatively impact the business of charging companies. They express concerns that this will also degrade trust in the longevity of TfL policies. They say these charges will have a disproportionate impact on early adopters of EVs and express concerns about air quality. They recommend that we maintain the 100% CVD, give grandfather rights to existing CVD holders, and undertake a city-wide impact assessment.
Blacklane (SME within CCZ)	Blacklane expresses the opinion that it is too early to roll back the 100% CVD. They express concern that professional chauffeurs will be heavily penalised and that air quality and EV progress will be harmed. They say that not a high enough percentage of the PHV sector has switched to EVs to be taking away the discount. They also express concern that this will lower charging investment across the city. They are concerned that this will damage London's ability to be a world leader in air quality and EV transition. They recommend that the current CVD remains in place, but if not, to allow current CVD holders to have grandfather right. They also recommend a city-wide impact assessment.
Bolt	Bolt asks us to reconsider the CVD, distinguishing between private and shared vehicles. They state that shared mobility supports the shift away from private vehicle use, especially for those who need to use cars.
Bright Sparks T.V & Film Ltd	Bright Sparks say that they don't believe the changes will make a difference as people only drive in London if they have to. They highlight that their work hours and equipment load sometimes make using public transport for work impossible. They also say that, due to the geographical range of their work, switching to an EV is not feasible and having two vehicles as a small business is too expensive.
Brooks Transport Services Ltd	Brooks Transport Services Ltd. state that HGVs are essential and have to enter the CCZ. They note the benefit of HGVs to the city.
Collaborative Mobility UK (CoMoUK)	CoMoUK express concern about how the rising cost will impact car clubs and lower-income Londoners. They recommend that the cost should be reduced for car club vehicles. They also recommend that electric car club vehicles continue to receive the 100% CVD to ensure car clubs can continue maintaining their above-average percentage of EVs. They also recommend that car club vehicles within the zone be eligible for a 100% residents' car club discount.

DHL	DHL believes that the new CVD rate is not sufficient for the current state of the electric van and HGV market. They believe these proposals penalise early adopters. They also believe that vans and HGVs should not be considered in the same category. They recommend that the full exemption for zero emission vans and HGVs should remain until the market has further matured. DHL are against linking raises in the Congestion Charge to public transport costs due to the volatility it would create for companies trying to plan. They recommend a 5-year review cycle with clear lead-in times.
DPD	DPD express concern at the higher cost and recommend that we reconsider an increase of this size at this time, and instead use a phased approach for the increase. They also express concern at the changes to the CVD, viewing it as a disincentive to electrify. They recommend that we maintain a 100% discount for commercial EVs.
Enterprise Mobility	Enterprise Mobility urges us to consider a discount or exemption for all rental vehicles and car clubs.
Euro Fire Protection and Maintenance Service	Euro Fire Protection and Maintenance Service states that people do not drive for fun in London, but because they need to. They suggest different charges between cars and commercial vehicles.
Evri Ltd.	Evri Ltd. express their concerns about the proposals, particularly about the removal of the CVD for vans and HGVs. They say this may cause many delivery companies to return to diesel vans. They recommend that we should develop a mechanism to identify zero emission vans and HGVs in the logistics, freight and express delivery sector and extend the full exemption for these vehicles. They express concern about the rising costs for businesses transporting goods through London. Evri oppose the proposal of annual review of the Congestion Charge, particularly if linked to public transport fares as logistics and passenger transport are different services and this would create financial uncertainty. They recommend that charge levels be reviewed on a multi-year basis with a long lead time. They also highlight barriers to electrification, such as payload constraints, infrastructure limitations, and challenges with e-HGVs. They recommend that we work with the logistics sector to design policies that reflect the practical constraints of freight electrification.
Exmoor Caviar & London Fine Foods Group	Exmoor Caviar and London Fine Foods Group express the opinion that the increased charge is more of a tax than a deterrent. They are against measures against cars and suggest more of a focus on improving public transport. They state that the Tube is not good outside of Central London. They suggest that the Mayor puts funding into public-use bikes as a solution. They also raise the issue of the cost of Lime bikes and the way that people abuse them. They encourage the Mayor to consider a similar system to Tokyo, with government-owned bikes.
Fastned (charge point operator)	Fastned raise concerns that the decrease in the CVD may stifle EV growth. They raise issue with the fact that the consultation focuses solely on congestion rather than on congestion and climate. They propose a

	gradual reduction of the CVD, starting at a £15 discount. They also propose a full discount for electric HGVs, vans and quadricycles. They suggest the CVD should be phased out gradually over 5 years.
Ford Motor Company	Ford express their concern that the changes to the CVD will undermine air quality and emissions efforts. They request that commercial vehicles continue to benefit from the 100% CVD until 2035. They also request that we maintain the CVD for cars until 2035 due to the lagging consumer demand for EVs.
Heathmore Estate Management	Heathmore Estate Management oppose the proposed changes. They raise concerns that the current congestion charge model is making it difficult to run services like theirs. They ask that we consider the impact of the charges on small businesses.
Ingep Ltd	Ingep Ltd suggest that the charge should be incremental, correlated to the number of days in a month driven in the CCZ. They suggest that proposal B will only dissuade people who only drive in the zone 1-3 times per month and therefore will have no impact on traffic.
Jo Hansford (SME within CCZ)	Jo Hansford suggests that instead of raising the charge in the CCZ, the zone should be extended to other wealthy areas of London to raise revenue. They note that putting the charge up in the zone will lead to the loss of clients.
John Lewis Partnership	The John Lewis Partnership believes these proposals fail to recognise the importance of freight and deliveries to London's economy. They also highlight that CNG and LNG powered vehicles are omitted from the vehicle type list. They oppose proposal A as it does not impact the demand for freight and deliveries, and therefore will not reduce congestion. They support proposal B but note that the level of discount and support must be appropriate to encourage ongoing vehicle uptake.
K.Ruggins Construction (SME)	K.Ruggins state that the congestion charge has cost the business a lot of money. They criticise the Mayor and TfL. They also asks Kier Starmer to call them.
Lowndes Square One RTM Company Ltd	Lowndes Square One RTM Company Ltd express concerns that the charge is inflationary and will negatively financially impact their contractors. They state that proposals B and C will have no impact on congestion and are a tax increase on Londoners.
miniways car service	Miniways Car Service express that minicab offices are already struggling with the current congestion charge. They suggest an exemption for PHV drivers.
Putney Investment Ltd	Putney Investment Ltd. state that the congestion charge is a tax to rip off the motorist and they do not believe it will have an impact on traffic. They suggest it be abolished. They note that their employees will not vote for any party that supports the charge. They express concerns that it is anti-business and that it impacts businesses and residents in London.
RebirthX Ltd	RebirthX Ltd. raise concerns that the proposals will have a negative impact on drivers, particularly on those who wish to purchase an EV. They suggest that people will return to petrol cars due to the reduction

	in the CVD. They state that this change is a money grab. They request that the CVD remains at 100% until 2030.
Royal Mail	Royal Mail highlight that their Central Delivery Office is in the CCZ. They also highlight that a significant portion of their deliveries happen partially or completely on foot. They ask that 100% CVD remains in place for zero-emission freight vehicles as their journeys are much harder to switch away from driving. They say that e-cargo bikes and public transportation are not appropriate replacements for a fleet of vans. They also raise issue with the fact that e-cargo bikes' lifespans are not yet known and suggest that their use may create more congestion. They also state that removing the 100% CVD removes their incentive to increase their EV fleet. They oppose an annual raise to the congestion charge in line with fares as they claim it would make long-term business planning more difficult. They suggest that we explore an automatic registration scheme for the CVD. They say that we must do more to support businesses to transition to EVs, including improving public charging infrastructure.
Ruskins Trees & Soil Biology Ltd	Ruskins Trees and Soil Biology Ltd express concern about the impact of the proposals on businesses, note that businesses are essential to London, and suggest that additional costs will be passed on to customers. They express concerns about the disproportionate impact on small fleets, which will take longer to electrify.
Rutland Building	The Rutland Building state their belief that the charge is a stealth tax. They express concern about the impact of a higher charge at a time when cost is a huge factor for businesses and residents. They note that pollution and congestion are at an all-time low in Central London.
Santis Global	Santis Global state that the changes to the CVD are making them consider returning to diesel vehicles as the cost would be lower due to electric vehicles being more expensive than diesel vehicles.
Splend	Splend ask that we maintain the current CVD for electric PHVs due to the unique operational characteristics of PHVs and the demographic profile of HGV drivers. They also ask that we grandfather current CVD holders if any changes are implemented, and that we conduct a comprehensive impact assessment for PHV drivers. They note the commercial necessity of entering the CCZ for PHV drivers. They also note that PHV drivers are primarily working professionals for whom operating costs make up a significant portion of household income. They raise concerns about the financial impact of the increased cost on PHV drivers, particularly those who chose to invest in an EV. They note continued momentum in the shift to EVs for PHV drivers due to the CVD. They also express concern for the impact of reducing the CVD on air quality both inside and outside the

	CCZ, and express concern that the high upfront cost of EVs will make them less attractive if a complete discount is not provided. They also express concern about the higher cost of public charging, and suggest that a reduction in electric PHVs would undermine the commercial case for further investment in the charging network.
TeraCode	TeraCode state that the proposals will not have the intended effect. They suggest a charge of at least £50 per day on all non-electric vehicles, especially goods vehicles, while maintaining the 100% CVD.
Tesco	Tesco note that Proposal A is unlikely to influence journeys made into the CCZ by commercial freight operators as they do not come into the zone by choice. They state that the numerous charges in London, combined with the London Lorry Control Scheme (LLCS), restricts their ability to expand their off-peak operations. They encourage us to review the LLCS and align it with congestion policies. They raise concerns that the increase in the congestion charge risks passing costs onto Londoners. They raise concerns about the cost burden of Proposal B and note that proposals A and B combined risk disincentivising the transition to EVs. They recommend that we give a more generous CVD to electric vans and HGVs, integrate the congestion charge with the LLCS, and that we consider the operational realities of freight operators.
The AA	The AA oppose Proposal A and believe that it is a cash raising measure. They raise concerns that this increase is being introduced at a financially difficult time. They raise an issue with the fact that the consultation does not provide the opportunity to state disagreements with the proposed increase. They request that we include a yes/no option as to whether people support the proposals. They raise concerns with the fact that there are no methods included in the proposals to encourage drivers to leave their vehicles outside of the CCZ, like Park and Ride or Cycle. They ask that the Mayor creates park and ride hubs on the outskirts of the ULEZ area. They also express support for the retention of the existing CVD. They highlight that fleet EV conversion remains low and state that the CVD is essential to offset the downsides of purchase costs and lack of off-street charging access. They raise concerns that the new CVD could discourage EV adoption.
The Brewery Logistics Group	The Brewery Logistics Group request that we adopt a more freight inclusive approach to congestion charging as freight journeys are not discretionary. They raise concerns that the rising cost of driving in London is passing costs on to consumers. They state that car usage congestion is having the effect of increasing the number of HGVs needed to service London. They state that the congestion charge has no impact on freight operators.
The Edible Bus Stop Ltd	The Edible Bus Stop Ltd note how many Londoners use car share services, particularly instead of owning a car. They suggest that EV-based car sharing services should be exempt from the congestion charge.

Toyota Motor Europe	Toyota recommend that, as an alternative to Proposal B, we offer 100% CVD on all zero emission cars, pickups and vans until 2035, or that we offer 100% CVD for all zero emission PHV drivers, pickups and vans and 50% CVD for zero emission cars until 2035. They consider the lower CVD to be premature due to the low rate of zero emission vehicle use in London and raise concerns that it may discourage the uptake of zero emission vehicles and that the change in discount may be unfair for those who already switched to an EV. They also note a lack of customer demand for EVs. They note that PHV drivers play a vital role in London's economy and that they are important vehicles in improving London's air quality due to their high mileage. They raise concerns that the new CVD could disincentivise PHV drivers from switching to an EV.
Trojan Energy Ltd	Trojan Energy Ltd state the importance of vehicles in London being as clean as possible. They raise concerns that the new CVD risks removing a key incentive to drive a cleaner vehicle. They praise proposal C due to the new residents' discount being limited to EVs. The respondent notes that their personal travel habits would not change.
Uber	Uber's response focuses on Proposal B. They raise concerns that the changes to the CVD would undo the excellent progress that has been made in London in switching to EVs among PHV drivers, and that drivers may switch back to petrol or diesel vehicles. They raise concerns about the impact of this on air pollution, including in other parts of London. They raise issues with our modelling of the air quality impacts. They also state that there are not enough programmes and schemes in place to incentivise EV uptake to remove the CVD; they raise that, when the length of the CVD was initially planned, a zero-emission zone was planned, and that this zone is now not being implemented. They also state that plans for distance-based RUC have been shelved. They identify the CVD as a key driver of electrification for PHV drivers. They propose that we maintain 100% CVD for EV PHVs. If we choose to proceed with the changes, they ask us to conduct additional analysis and run a refreshed consultation using a different baseline with a 100 per cent CVD, grandfather the existing 100% CVD for existing EV PHV drivers, and to apply the CVD equally to all commercial vehicles, including PHVs. They highlight the benefit of PHV drivers switching to EVs, as they drive more miles than the average private car user, both inside and outside the CCZ. They raise concerns that we have overestimated the traffic impacts of EVs due to a lack of modelling. They suggest additional traffic and congestion modelling which accounts for substitution effects. They raise concerns about the reliability of our air quality modelling. They highlight that an increase in EVs has not led to an equivalent increase in trips in the CCZ. As part of their response, Uber included data produced by a consultancy firm based on the assumptions put forward in their response (including substitution effects and drivers switching back to non-EVs).

	They raise concerns about the negative financial impact on EV PHV drivers. They note that the majority of their drivers oppose the proposed changes and raise concerns that many will switch back to a non-EV and that many drivers who would have switched will not with the new CVD. They highlight that PHV drivers are often from BAME backgrounds and often live in boroughs with household incomes below the London average. They raise concerns about the disparity between these drivers and residents, who receive a grandfathered discount, and raise concerns that the impact assessment does not fully address these disparities. They raise concerns that the proposed changes would lead to an immediate reduction of air quality benefits, both inside and outside the CCZ. They suggest that these issues with air quality are not acknowledged in the consultation materials due to our modelling not accounting for EV drivers switching to non-EVs. They raise concerns about the accuracy of the Impact Assessment. They note that Proposal A will have a negative impact on non-EV drivers and that Proposal C sets a good example in grandfathering that could be applied to current EV PHV drivers..
Uniserv Enterprises Ltd	Uniserv Enterprises Ltd state their belief that this charge is intended to make money. They note that the tunnel charges have made it more difficult for their business to compete with contractors north of the river. They claim we have no intention of stopping vehicles from driving in London, and they express dissatisfaction with the Mayor.
UPS	UPS note the importance of express parcel deliveries to businesses. They support continued and enhanced incentives for zero-emission express vehicles. They suggest that the new CVD represents a step back for operators who invested early. They encourage us to consider low-emission alternatives like CNG and LPG. They do not support annual increases in the charge linked to public transport fares. They suggest that HGVs should be treated separately from vans as they face greater barriers to electrification. They raise concerns that removing the 100% CVD now could undermine the progress already made on electrification of fleets. They raise concerns that the EV market is not mature, that EVs are expensive and that charging infrastructure is difficult to install.
V+V Interni Ltd	V+V Interni Ltd state that their average speed has reduced since measures were brought in to reduce traffic. They state that this is because of bicycle lanes, 20mph speed limits, traffic light synchronisation, etc. They also raise a concern that congestion charge on the weekends penalises tourism and high street commerce.
Varmour	Varmour suggest that the congestion charge should be removed completely.

Vida Facilities Limited	Vida Facilities Limited express concern over the proposed increase, and over the Silvertown and Blackwall charges, and the rise in PCNs. They state that these changes will negatively impact them as their engineers are required to enter the CCZ to perform maintenance and passing this cost onto the customers will cause them to lose business. They state that absorbing these costs is unsustainable. They ask that we reconsider the increase, or explore exemptions for small service-based businesses.
Virgin Media O2	Virgin Media O2 raise concerns that additional costs for electric fleets are counterintuitive and will set back the commercial fleet transition. They highlight that costs for commercial electric vehicles have risen. They request that fleet operated electric vehicles remain fully exempt from the congestion charge. They also point out an error in the consultation form.
Zapmap Limited	Zapmap raise concerns about proposal B. They highlight that the CVD has been a factor in driving EV uptake. They raise concerns that changing the CVD will impact messaging around EV uptake. They also raise concerns that this change will hit high mileage drivers hardest and reduce the financial case for EV uptake. They express concern for air quality inside and outside of the CCZ. They support proposals A and C.
Zipcar	Zipcar suggests that car clubs should be treated differently to private use cars due to the benefits they provide. They raise concerns about the financial burden on car club providers. They also raise concerns that London is lagging behind the rest of Europe in car club services. They state that car clubs encourage people to give up private cars and suggest that they can be a key tool in reducing congestion due to this. They also note that it is difficult for car sharing services to pass on costs to customers due to the varying numbers of customers per car per day. They also raise concerns that, if these costs were passed on, they risk making car clubs uncompetitive in price relative to private cars. They raise that car club operators do not have access to private charging and therefore need to use the more expensive public network, and that EVs now have to pay Vehicle Excise Duty. They suggest that using EVs will be uneconomical for car clubs without a discount. They ask that we provide a reduced charge for car club vehicles. They raise concerns that the viability of car clubs will be damaged without this measure. They also ask, alongside a reduced charge for car club vehicles, that we introduce a separate 100% CVD for car club vehicles and that we make car club cars located in the CCZ eligible for the residents' discount. They raise the cost of EV charging using the public network as another issue. They state that the lower CVD may make EVs uneconomical for car clubs.
My Urban Car Website	My Urban Car raises concerns that the proposals reduce the incentives for businesses to use less polluting vehicles. They suggest that the Residents' discount is also removed for existing residents when they register a new car. They also suggest to either give EVs a 50% discount or apply the ULEZ charge to all diesel vans.

6. Charities and community groups

Brake (road safety charity)	Brake's primary concern is road safety. They support these changes as research suggests the Congestion Charge has lowered collisions.
Centre for Net Zero	The Centre for Net Zero believe the consultation is too narrow in scope, believing it should consider decarbonisation and air quality alongside congestion. They believe the changes to the CVD are premature and may undermine London's EV uptake. They express concern that this may make EVs financially unviable for some. They suggest that the full CVD should remain temporarily, and that we should consider grandfathering existing CVD-registered vehicles. They also suggest that we should conduct a fuller, city-wide impact assessment before implementing changes.
City Temple URC	City Temple URC raise concerns that the congestion charge is a tax on low-income Londoners who need to use a vehicle. They raise examples of people housed by organisations who do not have a choice in where they are housed. They state that the increase in congestion charge is unfair and that it will have no impact on congestion. They also raise the issue that EVs are not affordable and chargers are often unavailable.
Kippa BID	The Kippa BID states that the charge has seriously affected their member businesses and questions why anyone can pay to take a non-compliant vehicle into the zone. They also request the removal of the ULEZ from Marsden Hospital.
Koinonia C of E Schools Federation	Koinonia C of E Schools Federation suggest that school minibuses should be given an exemption as it is not always possible for children with needs to use public transport.
Northaw & Cuffley Residents Association	Northaw & Cuffley Residents Association state their opposition to pay-per-mile or equivalent schemes being brought in without electorate approval. They suggest that we should support businesses by encouraging vehicles to come into the CCZ, including by widening unpaid access in the evenings and on weekends.

Letter from Charities & CICs	The open letter raises concerns about the impact of the proposals on small businesses and charities, and the impact on climate goals. They state that businesses and charities who have done the right thing in switching to EVs will now have high costs and may have to switch back. They also raise concerns that future uptake of electric vans will be discouraged. They ask for a 100% discount for electric vans, quadricycles and trucks operated by SMEs or charities.
T&E (European Federation for Transport and Environment AISBL)	T&E support proposal A and welcome proposals around linking further increases with increases in public transport fares. They also support the continuation of the CVD, but raise concerns about the impact the lower discount will have on the uptake of electric vans by SMEs and charities. They also raise concerns about the financial impact the lower discount will have on shared electric vehicles. They propose that the CVD should continue at 100% for electric vans, quadricycles and HGVs run by SMEs and charities until 2030, reducing to 50% thereafter. They also propose that in the run up to March 2030, we should review the number of electric vans, HGVs and quadricycles using the CVD to assess whether further tweaks are needed, alongside an assessment of best international practice. They also suggest that the CVD for cars should have an end date. They support Proposal C but suggest that from 2035, the discount should only apply to electric cars. They propose that the CVD for electric car club vehicles should be in line with the Residents' discount until 2030 so that people are not priced out of accessing their services. They suggest that the congestion charge should apply at least until 9pm during the week. They also suggest that the congestion charge should be higher for large SUVs. They also request continued support for private hire drivers to electrify, including bringing forward the proposed consultation on new PHV vehicle licensing requirements to give greater certainty on the future.
The Felix Project	The Felix Project support the proposal to continue the CVD beyond 2030. They particularly support the difference in charges for different types of vehicle. However, they do not believe the discount for commercial vehicles is sufficient to enable a transition to cleaner vehicles for SMEs and charities. They also raise concerns about the impact of these proposals on car-share services.

	They suggest that the CVD should continue to be 100% for electric vans, quadricycles and HGVs. They note that the uptake of electric vans is lagging in the UK and that electric vans are not a major contributor to congestion. They raise concerns about the impact of diesel vans on the environment. They raise particular concerns about the low uptake of electric vehicles by SMEs. They recommend that in the run up to March 2030, we review the number of electric vans, HGVs and quadricycles using the CVD to assess whether further tweaks are necessary, alongside an assessment of international best practice.
Wandsworth Society	The Wandsworth Society states that proposal A is fair, due to the rise being below inflation. They welcome the CVD but express concerns that providing discounts for EVs may cause more traffic to enter the CCZ. They suggest that we monitor the levels of traffic in the CCZ to ensure this does not happen. They raise concerns that the proposed 90% residents' discount for EVs may be too high, therefore increasing traffic levels. They suggest a lower discount, and a generous discount for disabled residents. They support the linking of the congestion charge to public transport fares. They recommend that we monitor that public transport and traffic generation measures are maintained or improved.

7. Letters received on behalf of multiple stakeholders

In addition to individual stakeholder responses received as summarised in the preceding sections, we received three letters on behalf of multiple stakeholders during the consultation period. The letters are provided in full as follows:

(i) Electric London Coalition

Received on 11 August 2025; signed by 27 organisations.



City Hall
Kamal Chunchie Way
London
E16 1ZE

Monday 11th August 2025

Dear Mayor,

Today, the consultation on the future of the Congestion Charge Scheme and the Cleaner Vehicle Discount (CVD) closed. We have come together as a coalition of organisations from across the electric vehicle (EV) value chain driving forward momentum on EV uptake to strongly recommend that the CVD is continued in its current form. As consultation responses now come under review, we would welcome a meeting to discuss the future of the CVD and London's EV ambitions.

Over nearly a decade as Mayor, your bold policies have delivered significant improvements to London's air quality. This has helped London forge a role as a global leader in clean transportation. Maintaining the CVD is vital to protecting this leadership position.

We believe the proposed changes to the CVD will have negative implications across three key areas: for London's air quality, not just centrally but across the city; for drivers and communities in every borough facing much higher costs; and for future investment in London's EV infrastructure and fleets.

The CVD has become one of London's most powerful tools for cleaning the city's air and accelerating the switch to EVs. Since it was tightened to include only battery electric vehicles in 2021, it has encouraged thousands of drivers providing goods and services across the city to go electric.

The positive air quality impacts of the CVD have been felt across the whole of London. When accounting for both private hire and light goods vehicles, 90% of air quality improvements created by the CVD have been outside the central area, demonstrating the city-wide importance of maintaining the CVD.¹ We therefore urge consideration of the city-wide air quality impacts the CVD would continue to deliver.

Supported by the CVD, a third of new car sales in London are now electric. Tens of thousands of EVs provide goods, services and transport from Hillingdon to Havering and Barnet to Bromley. However, there is still a long way to go. Overall fleet conversion remains low, with just 30% of PHVs and only 3% of vans making the switch so far.²

For drivers and businesses, going electric comes down to a simple cost analysis. The purchase costs for EVs remain comparatively high and limited access to off-street charging in London means most need to rely on public charging networks. Whether a small business with just one vehicle or a larger fleet, the decision to go electric continues to require significant upfront investment which must be balanced by lower ongoing operating costs. For many, the CVD has tilted the financial equation in favour of going electric.

Yet, under the proposed changes, thousands of EV drivers who have made the right decision to switch to a clean vehicle now face the prospect of having to pay up to £13.50 a day to go into the centre. Frequent EV drivers will face new costs of around £3,000 a year – costs shouldered by everyday London households, small businesses and fleet operators.

We are approaching a critical time for the UK EV industry. Measures that bolster adoption and charging utilisation rates remain essential to securing the pipeline of investment for our city, keeping costs down for consumers and businesses, and ensuring London remains a world leader on EV adoption. With investment decisions being made now, the policy environment must provide confidence about the pace of adoption for the long term.



We recognise the plan to end the CVD was outlined in your 2018 Transport Strategy. However, wider planned policies that would have supported continued EV adoption have not been introduced. The CVD therefore remains the most powerful tool for driving forward the city's transition to EVs, helping to ensure that essential journeys that cannot be easily replaced by other transport methods are clean.

We want to work closely with you to continue making London's EV ambitions a reality. We would appreciate the opportunity to meet to discuss the future of the Cleaner Vehicle Discount and the city's EV priorities in more detail.

Yours sincerely,



¹ [Electric London Report](#)

² [Electric London Report](#)

(ii) Small businesses and charities letter (Group 1)

Received on 18 July 2025; signed by 14 organisations.

Sir Sadiq Khan
Mayor of London
City Hall
Kamal Chumchie Way
E16 1ZE

Sent by email: mayor@london.gov.uk

18th July 2025

Supporting small businesses and charities to electrify

Dear Mayor Khan,

Thank you for ensuring that the Cleaner Vehicle Discount will not entirely end in December this year. However, we feel there is room to go further than the currently proposed changes to the Cleaner Vehicle Discount to ensure electrification remains a fundamental part of small business growth whilst balancing the need to manage congestion in London.

There is one key change needed to TfL's proposals to help you on the journey to your manifesto commitment to create the world's first electric-vehicle ready global city and reach your 2030 net zero pathway: **an 100% discount for electric vans, Heavy Goods Vehicles and quadricycles operated by an SME or charity.**

The majority of business fleets still heavily rely on diesel vans, one of the leading contributors to NOx emissions in central London, stalling the city's air quality from improving. It is crucial that we have policy levers to drive the business transition towards electrification to ensure that your ambitious goals are met.

However, under the current proposals, small businesses who have done the right thing by investing in electric vans will face a new daily charge of £9. This could add over £3000 to the annual running costs of an electric van. This financial strain will discourage businesses from adopting electric vehicles, undermining your health and environmental targets. It may even encourage companies with EVs to shift back to diesel.

TfL's figures show that the vast majority of vehicles registered for the CVD are cars (91% of 116,000) and that vans represent only a small percentage of registrations (6%, ~6,200). Their figures also show that on an average day, 2,193 electric vans are

seen in the zone during charging hours, only about 2% of all vehicles driving in the zone.

The Congestion Charge has a key role in reducing congestion in its operational area, which we strongly support, but it is clear from TfL's numbers that the electric vans segment is not a major contributor to congestion. We welcome TfL's recognition that freight is on the whole a more socially beneficial and essential form of transport in the city than passenger cars by delineating between cars and electric vans, Heavy Goods Vehicles (HGVs), light quadricycles and heavy quadricycles.

However, as TfL's impact assessment says, it is important to encourage a shift to the most efficient and sustainable options for freight and servicing journeys, which includes switching to EVs. We know that the takeup of electric vans by SMEs is still in its infancy, as only 1.7% of London businesses using TfL's £122m ULEZ scrappage scheme switched to electric vans. Effectively raising the cost for a small business to £9 a day to drive an electric van in central London would discourage this shift. It would incentivise those who have already bought an electric van, or are considering it as their next choice, to look at a diesel van due to operational costs.

TfL have already set the precedent of specific policies in favour of smaller businesses through the ULEZ van and minibus scrappage scheme, which was only open to tradespeople, smaller businesses and charities. Further policy development would not be needed to understand this segment of London businesses and the operational parameters have been established.

Therefore, we would like to see a 100% discount for electric vans, Heavy Goods Vehicles and quadricycles operated by an SME or charity, alongside the already proposed 50% discount for larger companies.

We would be happy to meet to discuss this, and hope that you'll make this change to drive forward electrification in London whilst supporting small businesses.

Sincerely,

Laura Timm, London Regional Chair, FSB

Helen Barnard, Director of Policy, Research & Impact, Trussell

Jemima Hartshorn, Founder and Director, Mums for Lungs

Areeba Hamid, Co-Executive Director, Greenpeace UK

Anna Krajinska, Director, T&E UK

Vicky Edmonds, CEO, EVA England

James Sutton, Co-Director: Campaigns and Communications, Possible

Silviya Barrett, Director of Policy and Campaigns, Campaign for Better Transport

Nicola Pastore, Director, Solve the School Run

Jonathan Blades, Interim Director of External Affairs, Asthma and Lung UK

Oliver Lord, Head of UK, Clean Cities

Ben Pearce, Head of Health Effects of Air Pollution Programme, Impact on Urban Health

Dan Byam Shaw, Policy Lead, Felix Project

Quentin Given, Coordinator, Friends of the Earth London Network

CC: Mete Coban MBE, Seb Dance, Howard Dawber

(iii) Small businesses and charities letter (Group 2)

Received on 11 August 2025; signed by 93 organisations.

Sadiq Khan
Mayor of London
City Hall
Kamal Chunchie Way
E16 1ZE

Sent by email: mayor@london.gov.uk

11th August 2025

RE: Support small businesses and charities like us to electrify

Dear Mayor Khan,

Whilst we are happy to see that the Congestion Charge Cleaner Vehicle Discount is not ending, your current proposals will hit small businesses and charities hard. They also risk setting London's climate ambitions back.

Under your current proposals, small businesses and charities who have done the right thing by investing in electric vans will face a new daily charge of £9. This could add more than £3000 to the annual running costs of each electric van. Some of them may even have to shift back to diesel to make ends meet.

This financial strain will also discourage the future uptake of electric vans, undermining your health and environmental targets.

That's why we are coming together as businesses and charities to ask for an 100% discount for electric vans, quadricycles and trucks operated by an SME or charity, alongside the already proposed 50% discount for larger companies.

Yours sincerely,

Charities & CICs

Dan Byam Shaw, Policy Lead, The Felix Project
Helen Barnard, Director of Policy, Trussell
Raj Singh, CEO, The Thomas Franks Foundation
Christina Rowe, Al Madina Mosque Food Bank
Clemence Short, Chesham Community Fridge

Humayun Kabir, Trustee/Treasurer, Bensham Manor Community Association
Tom Kedge, Cook For Good
Clare Donovan, CEO, Cooking Champions
Monika Schwartz, Co-ordinator, Cooperation Girdlestone
Alesha Young, Ackee Tree
Luis Ventura, Programme Manager, AMURT UK
Martin Laheen, Management Committee Member, Antwerp Arms Association Ltd.
Benita Meli, Vice-chair, Bonamy and Bramcote TRA
Ola Balogun, Director, BREAKTHEBARRIER CIC
Claudia Phillips, Safeguarding lead, Claudia Jones Organisation
Tracey Anderson, Support Manager, Clean Break
Attracta Roden, Operations Manager, Copenhagen Street Foodbank
Ozar A, Community Member, Deptford Islamic Centre
Sofia Barbosa, CEO, Emmaus Greenwich
Joseph O'Kelly, Regional Manager for South London, FoodCycle
Alannah McGovern, Regional Manager for North and West London, FoodCycle
Amanda Inniss, Chair, Friends of Woodberry Down
Mary north, Founder of rescue, guardian angels animal support
Satinder Singh, Trustee, Gurseva charity
Pat Fitzsimons, CEO, Hackney Foodbank
Sally Sturgeon, Chair, Haringey Community Food Network
Nathalie Renaud, CEO, Highbury Vale Blackstock Trust | Elizabeth House
Community Centre
Matthew Porter, Storehouse Manager, Highway vineyard church & Storehouse
Elaine Maffrett, Community centre manager, Hilldrop Area Community
Association
Samuel Botchey, CEO, Horizon Youth and Community Action
Jess Brownrigg, Food Hub & Volunteer Coordinator, Hornbeam Community
Centre
Debra Mendes, Chair, Hornsey Vale Community Association
Amy Mendlesohn, Foodbank Coordinator, JW3 Foodbank
Kate Riches, Chair, Lewisham Churches For Asylum Seekers
Laurence Smith, Founder & CEO, Lewisham Donation Hub
Mel Shakespeare, Project Coordinator, Lewisham Local
Michael Smith, Director and founder, Mary Smith's Pantry

Mavis Parker, Volunteer, Pack Up soup kitchen Islington
 Alison Paule, Director, Paxton green time bank
 Thea Tait, Restorative Justice For All International Institute
 Paul Nunn, Chair of trustees, Sacred Heart Foodbank
 Milly Aylott Harvey, Centre Manager for Operations, SDCAS
 Lesa Saint, Leanne Cookson, Hannah Soodeen, Phoebe Faulkner, Share Community
 Svitlana Opanasenko, Family support, team lead , St Mary's Ukrainian School
 Seren John-Wood, Operations Lead, South Norwood Community Kitchen
 Saiqa Ali, CEO, Southern Women's Aid Network (SWAN)
 Sylvia Taylor, Southlands Arts Centre
 Fahim Dahya, Logistics and Partnerships Senior Manager, Sufr NW London
 Siobhan Hurley, Sustainable Merton
 Ben North, Operations Director, The Dockland Settlements
 Martin Spafford, The Drive Food Stall
 Ernest Nkrumah, Executive Officer, The Ernest Foundation
 Paddy Boyle, Administrator, The Manna Society
 Christian Peter, Community Hub Manager, The Olive Branch, Holy Trinity Church Hounslow
 Jane Downes, Centre manager, Woolwich Common Community Centre
 Ashley Robinson, UR4Meals Manager, The Upper Room
 Helen Goody and Mary Olsen, EastEnd Homes
 Jackie Pathay, Emmanuel Community Church International
 Roney Henderson, Fishers Christian Centre
 Christine Mueller, Community Work Coordinator, Frampton Park Baptist Church
 Wilson Komakech, Team Manager, Hestia Housing and Support
 Glenda Grant, Assistant Community Services leader, Lewisham Seventh Day Adventist Church
 Denise Ingleton, Elder, Leytonstone Seventh Day Adventist Church
 Hope YOLOYE, Executive Director, Living Way Ministries
 Lea Martin, Old Kent Road Family Zone
 Anwar Agabi, Queen of the Rosary
 Joycelyn Dankwa, CEO, Shepherd Fold Ministry
 Marian Boateng-Dodoo, K Strupinski, Wesley Aliprandi, London and Quadrant (L&Q)

Carmen Wilson, Cherry Crowe, Rita E Waligo, The Riverside Group
 Shahid Mughal, PECAN
 Cathy Russo, Branches Homeless Hostel
 Prashant Prasad, Sai Lion Youth Charity

Education

Sally Neaves, Head of School, Claremont Primary School
 Louise Singleton, Headteacher, Hambrough Primary and Nursery School
 Tamsin Roberts, Finance and Premises Director, Holy Cross Primary School
 Kirsty Packham, Deputy Headteacher, Oaklands Primary School
 Kathleen Coll, Headteacher, Our Lady of the Visitation
 Luan Davis-Staussi, Wormholt Park Primary School
 Kim Taylor, Senior Administrator, Wormholt Park Primary School
 Brigid Simmons, Woodlane High School
 Julie Gurbuz, Manager, Kiddiecare nurseries

Business

Anoma Radkevitch, Director, Bloomsbury Flowers London Ltd and In Water Ltd
 David Welch, Service Delivery Manager, Ethos Facilities Ltd
 Bruce Bratley, CEO, First Mile Limited
 Matthew Martin, Transport Manager, Fruitful Office
 Cliff Hardwick, Facilities Manager, H. Forman & Son
 Daniel Levan-Harris, Founder and CEO, Mango Couriers Ltd
 Mahid Miah, Founder & CEO, MYLAB SERVICES LIMITED
 Garry Pope, Nimble Starts Ltd
 Chris Benton, CEO, Pedal & Post
 Polly Glanville, Director, Promogroup Ltd
 Christina Lukhezo, Director, Sandringham Oak Consultants & Training Centre
 Miles Watson-Smyth, CEO, Windowflowers Ltd

GREATER LONDON AUTHORITY ACT 1999 TRANSPORT ACT 2000

Greater London (Central Zone) Congestion Charging (Variation) Order 2025

Made

20 May 2025

Coming into force

In accordance with articles 1(2) and 2

Whereas—

- (1) the Greater London (Central Zone) Congestion Charging Order 2004 (“the Principal Order”) imposes charges for the using and keeping of motor vehicles on specified roads in Greater London during specified hours and on specified days;
- (2) Transport for London has made a number of orders varying the provisions of the Principal Order; and
- (3) it appears to Transport for London expedient, for the purposes of facilitating the achievement of policies and proposals in the Mayor of London’s Transport Strategy published pursuant to section 142 of the Greater London Authority Act 1999^(a) that it should make an Order for the purpose of further varying the Principal Order:

Now, therefore, Transport for London, in exercise of the powers conferred on it by sections 295 and 420(1) of the Greater London Authority Act 1999, by Schedule 23 to that Act, and of all other powers enabling it in that behalf, hereby makes the following Order:—

Citation, commencement and interpretation

1.—(1) This Order may be cited as the Greater London (Central Zone) Congestion Charging (Variation) Order 2025.

(2) This Order shall come into force on the day following the day on which the Mayor confirms it.

(3) In this Order “the Principal Scheme” means the Scheme contained in the Schedule to the Principal Order as varied and in force immediately before this Order comes into force.

Variation of the Principal Scheme

2. The Scheme set out in the Schedule to this Order (the “Variation Scheme”), which varies the Principal Scheme, shall come into force on 2 January 2026.

Signed by authority of Transport for London

Dated 20 May 2025


Commissioner
ANDREW LORD.

(a) 1999 c.29; Schedule 23 was amended by the Transport Act 2000 (c. 38), Schedule 13

THE SCHEDULE

Article 2

SCHEME VARYING THE PRINCIPAL SCHEME

Preliminary

1.—(1) Article 1 of the Principal Scheme shall apply, so far as material, for the interpretation of this Scheme as it applies for the interpretation of the Principal Scheme.

(2) The Principal Order and the Principal Scheme shall be further varied in accordance with the provisions of this Schedule.

Arrangement of Instrument of the Principal Order

2.—(1) In the heading “8. Resident’s vehicles” after “Resident’s” insert “and electric”.

(2) In the heading “3. Resident’s Vehicles” after “Resident’s” insert “and Electric”.

(3) Before the heading “1. Meaning of qualified resident” insert the following new heading—
“Part 1 – Residents’ Vehicles”.

(4) After the heading “8. Holder ceasing to be a qualified resident” insert the following new headings—

“Part 2 – Electric Vehicles

1. Qualifying electric vehicles

2. Amount of charge payable by the purchase of a licence in respect of a qualifying electric vehicle”.

Interpretation

3.—(1) Article 1(2) of the Principal Scheme is amended as follows.

(2) After sub-paragraph (aa) insert the following new sub-paragraph—

“(ab) “car” means a vehicle designed and constructed to have not more than eight seats in addition to the driver’s seat and intended for the carriage of passengers;”.

(3) After sub-paragraph (j) insert the following new sub-paragraph—

“(ja) “heavy goods vehicle” means a vehicle designed and constructed for the carriage of goods having a maximum mass exceeding 3,500 kilograms;”.

(4) After sub-paragraph (ka) insert the following new sub-paragraph—

“(kb) “maximum mass” in relation to a vehicle means the technically permissible maximum laden mass as specified by the manufacturer;”.

(5) After sub-paragraph (ob) insert the following new sub-paragraph—

“(oc) “quadricycle” has the meaning given in article 3 of Regulation (EU) No. 168/2013 of the European Parliament and of the Council on the approval and market surveillance of two- or three-wheel vehicles and quadricycles;”.

(6) After sub-paragraph (p) insert the following new sub-paragraph—

“(pa) “qualifying electric vehicle” has the meaning given in paragraph 9 of Annex 3;”.

(7) In sub-paragraph (r) for “and resident’s vehicles” substitute “, resident’s vehicles and qualifying electric vehicles”.

(8) Renumber sub-paragraph (za) as (zb).

(9) After sub-paragraph (z) insert the following new sub-paragraph—

“(za) “van” means a vehicle designed and constructed for the carriage of goods having a maximum mass not exceeding 3,500 kilograms;”.

Payment of charges

4.—(1) Article 6 is amended as follows.

(2) In paragraph (6) for “(a) to (h)” substitute “(a) to (i)”.

(3) In sub-paragraph (6)(h)(v) for “.” substitute “;”

(4) After sub-paragraph (6)(h) insert the following new sub-paragraph—

“(i) a charge in respect of a qualifying electric vehicle, by CC Auto Pay except when the charge is payable by a fleet operator as specified in article 6(12)(a) in which case, by direct debit.”.

(5) In paragraph (12) for “£15” substitute “£18 or if the licence is in respect of a qualifying electric vehicle, the applicable charge which is set out in paragraph 10 of Annex 3 to this Scheme”.

Amount of charge payable by the purchase of a licence

5.—(1) Article 7 is amended as follows.

(2) In paragraphs (1) and (2) for “£15” substitute “£18”.

(3) In paragraph (3) for “£17.50” substitute “£21”.

(4) In paragraph (4)—

(a) for “paragraph 3” substitute “paragraphs 3 and 10”;

(b) after “residents” insert “and electric”.

Article 8

6. In the heading of article 8 after “Residents” insert “and electric”.

The register of non-chargeable, reduced rate and resident’s vehicles

7.—(1) In the heading of article 9 for “and resident’s” substitute “, resident’s and electric”.

(2) In article 9(1)—

(a) for “and resident’s” substitute “, resident’s and qualifying electric”;

(b) after “Annex 3 (residents)” insert “and electric”.

Annex 3 to the Scheme

8.—(1) In the heading of Annex 3 to the Scheme before “RESIDENTS” insert “PART 1 - ”.

(2) Paragraph 2 of Annex 3 to the Scheme is amended as follows.

(3) In sub-paragraph (1)(b) after “sub-paragraph (2) for “.” substitute “; and”.

(4) After sub-paragraph (1)(b) insert the following new sub-paragraph—

“(c) in relation to any qualified resident who applied to Transport for London to be treated as a qualified resident by way of an application made on or after 1 March 2027, the vehicle is a resident’s electric vehicle within the meaning of sub-paragraph (3) or a substitute vehicle within the meaning of paragraph 4(1)(a)(ii) in respect of which Transport for London has satisfied itself that the requirements of paragraph 4(1)(a) are met and that the substitute vehicle meets the requirements in paragraph 2(2)(a) and (d)”.

(5) Renumber sub-paragraph (3) as sub-paragraph (4).

(6) After sub-paragraph (2) insert the following new sub-paragraph (3)—

“(3) A vehicle is a resident’s electric vehicle if—

(a) it is a vehicle for which a nil licence is in force by virtue of its being an exempt vehicle for the purposes of the 1994 Act in accordance with paragraph 20G (electrically propelled vehicles) of Schedule 2 to that Act; or

(b) Transport for London is satisfied that the vehicle—

(i) operates wholly by means of an electrically powered propulsion system that draws its motive power from either a hydrogen fuel cell or from a battery that can be fully recharged from an external source of electricity; and

(ii) has tailpipe CO₂ emissions of 0 grams per kilometre.”.

9.—(1) Paragraph 3 is amended as follows.

(2) In sub-paragraph 3(a) for “£1.50” substitute “£1.80”.

(3) In sub-paragraph 3(b)(i) for “£10.50” substitute “£12.60”.

(4) In sub-paragraph 3(b)(ii) for “£46.50” substitute “£55.80”.

(5) In sub-paragraph 3(b)(iii) for “£1.50” substitute “£1.80”.

10.—(1) Paragraph 4 is amended as follows.

(2) In sub-paragraph 1(b), for “(e)” substitute “d”.

11.—(1) After paragraph 8 insert the following new heading—

“PART 2 - ELECTRIC VEHICLES”.

(2) After the heading “PART 2 - ELECTRIC VEHICLES” insert the following new paragraphs—

“Qualifying electric vehicles

9.—(1) A vehicle is a qualifying electric vehicle if it is a heavy goods vehicle, a van, a car or a quadricycle—

(a) for which a nil licence is in force by virtue of its being an exempt vehicle for the purposes of the 1994 Act in accordance with paragraph 20G (electrically propelled vehicles) of Schedule 2 to that Act; or

(b) that Transport for London is satisfied—

(i) operates wholly by means of an electrically powered propulsion system that draws its motive power from either a hydrogen fuel cell or from a battery that can be fully recharged from an external source of electricity; and

(ii) has tailpipe CO₂ emissions of 0 grams per kilometre,

provided in each case that that particulars of the vehicle are entered in the register in accordance with article 9 of this Scheme.

Amount of charge payable by the purchase of a licence in respect of a qualifying electric vehicle

10. The charge for a licence in respect of a qualifying electric vehicle is—

(a) in respect of a heavy goods vehicle, van or quadricycle—

(i) up to and including 3 March 2030, £9;

(ii) on or after 4 March 2030, £13.50;

(b) in respect of a car—

- (i) up to and including 3 March 2030, £13.50;
- (ii) on or after 4 March 2030, £15.75.”.

GREATER LONDON AUTHORITY ACT 1999 TRANSPORT ACT 2000

Greater London (Central Zone) Congestion Charging (Variation) Order 2025 Instrument of Confirmation 2025

Made

November 2025

Coming into force

In accordance with article 1

Whereas—

- (1) On 20 May 2025 Transport for London made the Greater London (Central Zone) Congestion Charging (Variation) Order 2025 (“the Variation Order”) which contained in a Schedule a Scheme (“the Variation Scheme”) for varying the Greater London (Central Zone) Congestion Charging Order 2004;
- (2) pursuant to paragraph 4(1)(b) of Schedule 23 to the Greater London Authority Act 1999 Transport for London submitted the Variation Order to the Mayor of London for confirmation; and
- (3) the Mayor of London has decided to confirm the Variation Order with modifications:

Now, therefore, the Mayor of London, in exercise of the powers conferred on him by paragraph 4(1)(b) of Schedule 23 to the Greater London Authority Act 1999, and of all other powers enabling him in that behalf, hereby makes the following Instrument:—

Citation, commencement and interpretation

1. This Instrument may be cited as the Greater London (Central Zone) Congestion Charging (Variation) Order 2025 Instrument of Confirmation 2025 and shall come into force on the day on which it is made.

Confirmation of the Variation Order

2. The Greater London Low Emission Zone Charging (Variation) Order 2025 is hereby confirmed subject to the modifications set out in the Schedule to this Instrument.

Dated

11th

November 2025



Mayor of London

THE SCHEDULE

Article 2

MODIFICATIONS TO THE VARIATION SCHEME

Arrangement of Instrument of the Principal Order

1. In article 2 of the Variation Scheme—

- (a) renumber paragraphs (2) to (4) as paragraphs (4) to (6) respectively;
- (b) after paragraph (1) insert the following new paragraphs—

“(2) In the heading “9. The Register of non-chargeable, reduced rate and resident’s vehicles” for “and resident’s” substitute “, resident’s and electric”.

(3) After the heading “12. Vehicles used by certain local authority and charity employees” insert the following new heading—

“13. Car club vehicles”.”.

Interpretation

2.—(1) Article 3 of the Variation Scheme is amended as follows.

(2) In paragraph (2)—

- (a) for “new sub-paragraph” substitute “new sub-paragraphs”; and
- (b) after “passengers;” insert—

“

(ac) “car club” means an organisation that Transport for London is satisfied, by the production of such evidence as it may reasonably require—

- (i) manages and administers a club for the purpose of hiring cars or vans to individuals who are subscribers to that organisation; and
- (ii) has been accredited nationally by CoMoUK or by another national organisation that Transport for London may from time to time specify on its website;”.

(3) Renumber paragraphs (7) to (9) as paragraphs (9) to (11) respectively and renumber paragraphs (3) to (6) as paragraphs (4) to (7) respectively.

(4) After paragraph (2) insert the following new paragraph—

“(3) After sub-paragraph (i) insert the following new sub-paragraph—

“(ia) “electric vehicle” means a vehicle—

- (i) for which a nil licence is in force by virtue of its being an exempt vehicle for the purposes of the 1994 Act in accordance with paragraph 20G (electrically propelled vehicles) of Schedule 2 to that Act; or
- (ii) in respect of which Transport for London is satisfied that the vehicle operates wholly by means of an electrically powered propulsion system that draws its motive power from either a hydrogen fuel cell or from a battery that can be fully recharged from an external source of electricity, and has tailpipe CO₂ emissions of 0 grams per kilometre;”.

(5) In sub-paragraph (4) as renumbered for “After” substitute “Renumber sub-paragraph (ja) as (jb) and after”.

(6) After paragraph (7) as renumbered insert the following new paragraph—

“(8) In sub-paragraph (n) for “or 10” substitute “, 10 or 13”.”.

The register of non-chargeable, reduced rate and resident's vehicles

3.—(1) Article 7 of the Variation Scheme is amended as follows.

(2) After paragraph (2) insert the following paragraphs—

“(3) In article 9(2) after “Particulars of a” insert “non-chargeable, reduced rate or resident’s”.

(4) In article 9(5) after “reduced rate vehicle” insert “, a qualifying electric vehicle”.”.

Annex 2 to the Scheme

4.—(1) Renumber articles 8 to 11 of the Variation Scheme as articles 9 to 12 respectively.

(2) After article 7 of the Variation Scheme insert the following new article—

“Annex 2 to the Scheme

8. After paragraph 12 of Annex 2 insert the following new paragraph—

“Car club vehicles

13.—(1) An eligible car club vehicle is a non-chargeable vehicle provided particulars of the vehicle are entered in the register in accordance with article 9 of this Scheme.

(2) A relevant vehicle is an eligible car club vehicle if Transport for London is satisfied, by the production of such evidence as it may reasonably require, that—

(a) the vehicle is an electric vehicle other than a private hire vehicle;

(b) a car club is the registered keeper of the vehicle;

(c) the vehicle is made available by the car club concerned for driving exclusively by individuals who are subscribers of that car club by hiring the vehicle for a limited period;

(d) the vehicle is kept in a designated parking place within the residents' discount zone and is required by the car club to be returned to the same parking place at the end of any period of hire by a subscriber.

(3) In this paragraph—

(a) references to a person driving a vehicle are to be construed in accordance with s.103(3) of the Transport Act 1968;

(b) “parking place” has the meaning given in section 32(4) of the Road Traffic Regulation Act 1984; and

(c) “private hire vehicle” has the meaning given in section 1 of the Private Hire Vehicles (London) Act 1998.”.”.

Annex 3 to the Scheme

5.—(1) In article 9 of the Variation Scheme as renumbered—

(a) omit paragraph (5); and

(b) renumber paragraphs (3) and (4) as paragraphs (4) and (5) respectively.

(2) After paragraph (2) insert the following new paragraph—

“(3) Renumber sub-paragraph (3) as sub-paragraph (6) and sub-paragraph (2) as sub-paragraph (3).”

(3) In paragraph (4) as renumbered omit the words from “after” to the end of the paragraph and substitute with “for “sub-paragraph (2).” substitute “sub-paragraph (3); and”.”.

(4) In paragraph (5) as renumbered—

- (a) for “new sub-paragraph” substitute “new sub-paragraphs”;
- (b) for “1 March 2027” substitute “the relevant date,”;
- (c) for “a resident’s” substitute “an”;
- (d) for “sub-paragraph (3)” substitute “article 1”;
- (e) for “2(2)” substitute “2(3)”; and
- (f) after “and (d).” insert—

“

(2) The relevant date for the purposes of sub-paragraph (1)(c) is—

- (a) in the case of a resident eligible for specified benefits, 4 March 2030; and
- (b) in the case of any other qualified resident, 1 March 2027.”.

(5) For paragraph (6) substitute the following paragraph—

“(6) After sub-paragraph (3) as renumbered insert the following new sub-paragraphs—

“(4) For the purposes of this paragraph a qualified resident is a resident eligible for specified benefits if they first made an application to be treated as a qualified resident on or before 3 March 2030 and Transport for London is satisfied that, at the time of that application, the qualified resident concerned was in receipt of one of the following benefits—

- (a) attendance allowance;
- (b) carer’s allowance;
- (c) disability living allowance;
- (d) employment and support allowance;
- (e) personal independence payment;
- (f) state pension credit;
- (g) universal credit,

or was a qualified resident that Transport for London is satisfied would have been eligible for one of the above benefits but for the fact that they were only temporarily resident in the United Kingdom.

(5) In this paragraph—

- (a) “attendance allowance” means an allowance under section 64 of the Social Security Contributions and Benefits Act 1992;
- (b) “carer’s allowance” means an allowance under section 70 of the Social Security Contributions and Benefits Act 1992;
- (c) “disability living allowance” means an allowance under section 71 of the Social Security Contributions and Benefits Act 1992;
- (d) “employment and support allowance” means an allowance under section 1 of the Welfare Reform Act 2007;
- (e) “personal independence payment” means a payment under section 77 of the Welfare Reform Act 2012;
- (f) “state pension credit” means state pension credit under the State Pension Credit Act 2002;
- (g) “universal credit” means the benefit under Part 1 of the Welfare Reform Act 2012; and

(h) reference to a statute or statutory provision shall be construed as including a reference to that statute or provision as re-enacted or superseded.”.”.

(6) For article 11(2) of the Variation Scheme as renumbered substitute—

“(2) In sub-paragraph (1)(b) for “(e) of paragraph 2(2)” substitute “(d) of paragraph 2(3)”.”.

Qualifying electric vehicles

6. In article 12(2) of the Variation Scheme as renumbered—

- (a) after “9.” omit “— (1)”;
- (b) omit the words from “(a) for which a nil licence is in force” to “article 9 of this Scheme.” inclusive;
- (c) after “quadricycle” for “—” substitute “that is also an electric vehicle, provided in each case that that particulars of the vehicle are entered in the register in accordance with article 9 of this Scheme.”;
- (d) after “charge for a licence in respect of a qualifying electric vehicle” insert “, other than a resident’s vehicle,”.

Pursuant to paragraph 34 of Schedule 23 to the Greater London Authority Act 1999, the Mayor issues the following supplementary guidance to the guidance which was previously issued in 2007 (“the Guidance”). TfL shall have regard to the Guidance as amended by or supplemented with the paragraphs below:

The following changes are made to the Guidance:

- 1.1 In paragraph 3.4, change ‘10 weeks’ to ‘6 weeks’.
- 1.2 In paragraph 4.5, change ‘10 weeks’ to ‘6 weeks’.
- 1.3 In paragraph 5.5, change ‘5 weeks’ to ‘3 weeks’.
- 1.4 In paragraph 8.5, change ‘10 weeks’ to ‘6 weeks’.
- 1.5 On a new page after paragraph 6.8, insert the following text:

6A Routine variations to a charging scheme order

Circumstances when a variation to the user charges specified in a charging scheme order may be made by a routine variation order

6A.1 Notwithstanding the descriptions of major, minor and exceptional variations to a charging scheme order set out above, amendment of the user charges specified in a charging scheme is to be regarded as a routine variation rather than a major, minor or exceptional variation when the user charges are increased by:

- (a) the overall percentage by which fares on the Tube or other TfL railway services are to be increased as set out in a direction which has been or is intended to be issued to TfL by the Mayor pursuant to section 155 of the Greater London Authority Act 1999;
- (b) the inflation annual rate¹ for the July preceding the introduction of the revised user charge levels plus 1%; or
- (c) an amount which is less than the amount which would apply if the user charges were increased in line with (a) or (b).

6A.2 User charges include any charges associated with the payment of the user charges such as registration fees but does not include penalty charges or other enforcement related charges.

Circumstances when changes to a scheme order other than increases to user charges may also be made by a routine variation order

6A.4 Changes to a Scheme Order which are administrative or procedural in nature may also be regarded as routine variations rather than major, minor or exceptional

¹ Using the Retail Prices Index (“RPI”). 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.

variations. They include but are not limited to changes relating to how user charges may be purchased, the methods by which customers may provide information (e.g. by post) or the removal of redundant or outdated references.

Making and submitting a routine variation order

6A.5 When making routine variations, TfL must set out the amendments to be made to the Scheme Order in a routine variation order and submit the made order to the Mayor for confirmation.

6A.6 TfL may make a routine variation order whenever it thinks it is appropriate to do so including on an annual basis.

Consultation

6A.7 If TfL makes a routine variation order, the Mayor does not expect TfL to consult on the amendments to the Scheme Order which are contained in the routine variation order.

Confirming and publicising the routine variation order

6A.8 Where the Mayor decides to confirm (with or without modifications) a routine variation order, the Mayor expects TfL to publish a notice of the making and confirmation of the order in the London Gazette.

6A.9 The notice may include such information and be in such form as TfL considers appropriate but the Mayor expects it to include:

- A statement that TfL is the charging authority;
- The title of the order;
- A date on which the changes set out in the routine variation order would apply from;
- A brief statement of the reasons for making the changes;
- A statement of how to obtain a copy of the routine variation order.

6A.10 In addition, the Mayor expects TfL to take any other action it considers appropriate to publicise the changes set out in the routine variation order and the date on which they will apply from.