

GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION – MD2883

Changes to the Congestion Charging Scheme

Executive summary:

In order that the Congestion Charging Scheme (CC Scheme) remains effective in meeting its objectives and furthering the aims of the Mayor's Transport Strategy (MTS), Transport for London (TfL) consulted the public and stakeholders on various proposed changes to the CC Scheme. The key Proposed Changes relate to the level of charge; charging hours and days; and the residents' and Auto Pay discounts.

The consultation ran for 10 weeks between 28 July and 6 October 2021. A total of 9,680 responses were received including 92 stakeholder responses. TfL has analysed these responses and considered all of the issues that have been raised in a Report to the Mayor (Appendix 1). The Mayor is now asked to decide whether the Proposed Changes should be implemented with the suggested modifications.

The Proposed Changes would replace the temporary changes introduced in response to the transport challenges of the pandemic by MD2648 and MD2663, which are currently in place. All changes other than to charging hours and days would take effect on 20 December 2021. Changes to charging hours and days would take effect on 21 February 2022.

Decision:

The Mayor having considered:

- the responses to the consultation on the Proposed Changes and TfL's Report to the Mayor on the consultation (Appendix 1) which includes the Integrated Impact Assessment (IIA) (appended to that report)
- the content of and advice given in this form and appendices regarding the various matters for decision, including whether further information is required before making a decision and whether further consultation or the holding of any inquiry, public or otherwise, is necessary or appropriate before making a decision

confirms the Greater London (Central Zone) Congestion Charging (Variation) Order 2021 (Appendix 2) with the modifications recommended by TfL.

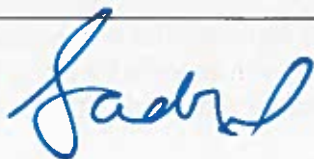
[The Mayor is requested to sign and date the Instrument of Confirmation at Appendix 5]

Mayor of London

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

The above request has my approval.

Signature:



Date:

15/12/21

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

Decision required – supporting report

1. Introduction and background

The Congestion Charging Scheme

- 1.1. London's streets are some of the most congested in the country, delaying bus services and other essential traffic such as freight, making walking and cycling unpleasant and unattractive; worsening air quality and carbon emissions; and leading to increased road danger.
- 1.2. In addition, congestion causes inconvenience and unreliability for motorised road users and has a significant cost to London's economy. The annual cost of congestion is estimated at around £4.9bn¹ based on the delay faced by people driving. This figure does not account for the cost of congestion on bus passengers and bus operating costs.
- 1.3. The Mayor's Transport Strategy (MTS) sets out that the future of central London must involve a steady reduction in car use as well as specific traffic reduction targets. These include a 10 per cent reduction in freight traffic in the central London morning peak by 2026; and an overall reduction of traffic in London by 10-15 per cent by 2041.²
- 1.4. In the MTS, the Mayor sets out his commitment to make London a place where it is easy for people to walk, cycle and use public transport. He also commits to road space that is carefully managed to prioritise these modes; and to facilitate the efficient and environmentally sustainable movement of essential delivery and servicing vehicles (the Healthy Streets approach). The MTS aims for 80 per cent of journeys to be made by walking, cycling or public transport by 2041; however, this is higher for trips within central London (95 per cent) and between central London and inner/outer London (99 per cent).
- 1.5. The objective of the Congestion Charging Scheme (CC Scheme) is to reduce traffic and congestion within the Congestion Charging zone (CCZ). The charge acts as a disincentive to car use in the zone, and has a role to play in delivering the mode share aims of the MTS. Lower levels of traffic improve conditions for people walking and cycling; and increase the speed and reliability of bus journeys. A shift from car use to sustainable modes contributes to more efficient use of the streets in central London by freight and other essential vehicle trips.
- 1.6. The MTS outlines that since the introduction of the Congestion Charge, the challenges facing central London have changed. It commits the Mayor and Transport for London (TfL) to keeping the CC Scheme under review in order to ensure that it remains fit for purpose, as set out in Proposal 20:

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

- 1.7. The MTS vision for central London is that it must remain very well connected, with world-class public realm and safe air-quality levels. It highlights the importance of bus services and the need to ensure their reliability, while the number of people walking, cycling and using public transport must continue to increase.
- 1.8. Separate to the CC Scheme, but of interest in this context, is the recent extension of the Ultra Low Emission Zone (ULEZ). In April 2019 the ULEZ was implemented in the same area as the CCZ. It imposes a charge additional to the Congestion Charge on vehicles being driven within the CCZ/ULEZ that do not comply with the prescribed emissions standards. On 25 October 2021 the

¹ <https://inrix.com/press-releases/2019-traffic-scorecard-uk/>

² Compared to 2015, the base model year of the MTS.

ULEZ was extended to the North and South Circular Roads. This does not affect the operation of the CC Scheme in its current nor proposed amended form, but is noted for context.

Making changes to the CC Scheme

- 1.9. The MTS highlights that 15 years after the introduction of the Congestion Charge, while it remains an integral part of managing road space, the challenges facing central London have changed. It emphasises the changing composition of vehicles in the CCZ and the times in which they enter the zone, highlighting that weekend traffic levels in the CCZ have become similar to weekday levels.
- 1.10. The CC Scheme is kept under review to ensure it remains effective to reduce motorised traffic and support the delivery of the MTS. As a consequence, there have been a number of changes to the scheme since it was first introduced, including the level of charge; the penalty charge for non-payment; payment methods available; discounts and exemptions to the scheme; and, most recently, through temporary changes introduced in response to the transport challenges arising from the COVID-19 pandemic.
- 1.11. As explained in the Supplementary Information of the consultation materials, TfL has developed five post-COVID-19 pandemic scenarios of different travel demand levels. The range of scenarios enables TfL to make plans in the face of increased uncertainty about the future social and economic characteristics of London, including travel behaviours. To enable detailed assessments, TfL has also developed two forecasts. As is usual in traffic modelling, there is a 'Reference Case', defined in a similar way to pre-pandemic forecasts: it assumes no further restrictions are brought in and people start returning to their pre-pandemic routines, so that by the time we reach the first forecast horizon (2026) there is no additional behaviour change. There is also a 'Hybrid Forecast', which accounts for the latest evidence on London's recovery and maps a central position in the range of plausible outcomes as defined by the scenarios; this forecast is kept under regular review. The latest version of the Hybrid Forecast assumes slightly slower population growth; more working from home and online shopping; and a slower recovery in public transport usage than the Reference Case. In both the Reference Case and the Hybrid Forecast, traffic levels in central London (including car use) increase from pre-pandemic levels.
- 1.12. The changes currently proposed are informed by monitoring of the CC Scheme and TfL's regular monitoring of progress towards the MTS objectives of, for example, increased sustainable mode share, traffic reduction, air quality and Vision Zero.³ Another important consideration is the need to ensure efficient movement in central London. TfL, as the charging authority for the CC Scheme, is therefore proposing the following changes be made to the CC Scheme (the Proposed Changes):
 - a daily charge of £15
 - a charge period of 07:00 to 18:00, Monday to Friday; and 12:00 to 18:00 on Saturdays, Sundays and bank holidays
 - no charge between Christmas Day and New Year's Day bank holidays (inclusive)
 - 90 per cent residents' discount, opened to all eligible applicants
 - £17.50 charge level to pay after the day of travel, with the deadline for payment extended to three days after travel
 - no discount for payments made by Auto Pay or Fleet Auto Pay

³ Monitored data is reported in the annual Travel in London reports, published on TfL's website. Additional information on the Congestion Charge and central London can be found in the Supplementary Information published as part of the statutory consultation.

- updating of reimbursement arrangements for NHS patients who are vulnerable to risk of infection; care home workers working at care homes in the CCZ; and local authority/charity workers and volunteers providing certain services in relation to the COVID-19 pandemic, so that these arrangements apply during epidemics or pandemics prevalent in Greater London (which includes the current COVID-19 pandemic) – the expanded NHS staff reimbursement would also continue
- no online or app payments by residents for consecutive charging days.

Temporary changes made in summer 2020: reviewing their effectiveness

- 1.13. To address the transport challenges arising from the COVID-19 pandemic, a package of temporary changes to the CC Scheme came into effect on 22 June 2020. The temporary changes were introduced in accordance with a condition of the funding provided by the Department for Transport in the wake of the decimation of TfL's fare revenue. The condition required TfL to urgently bring forward proposals to widen the scope and levels of road user charging schemes. The temporary changes are intended to support the enhanced provision of space for walking and cycling as implemented by the Mayor's Streetspace plan and to facilitate the efficient flow of essential traffic, including buses and freight. The Mayor has committed TfL to keeping these temporary changes under review, having regard to the transport challenges created by the pandemic and taking account of important milestones in the response to the pandemic or significant changes in circumstances.
- 1.14. These temporary changes are set out in **Table 1**. The Mayor's decisions to implement these temporary changes are set out in two previous Mayoral Decision Forms: MD2648 and MD2663 (the latter is concerned with temporary reimbursement schemes).
- 1.15. TfL's review of the temporary changes (which was undertaken following the move to step 4 of the government's roadmap) concluded that several transport challenges continue to persist and the temporary changes are a necessary response to them. They remain in place as an effective means of managing congestion and the efficient movement of traffic in central London. The intention is that they would be replaced by the Proposed Changes which have now been consulted on if the Mayor decides to confirm them. The proposed timetable for implementation of the Proposed Changes is 20 December 2021 (for all changes other than the new charging hours and days) and 21 February 2022 (the charging hours and days). Table 1 compares the pre-pandemic CC Scheme with the temporary changes and the current proposals.

Table 1: Comparison of the CC Scheme: pre-pandemic; temporary changes; Proposed Changes

	Pre-pandemic scheme (up to 22 June 2020)	Temporary changes to the Congestion Charge from 22 June 2020	Proposed Changes
Charge level	£11.50	£15	£15
Auto Pay and Fleet Auto Pay	£1 discount	No discount	No discount
Pay 'next day' charge	£14 next day charge	£17.50 if paid up to three days after travel	£17.50 if paid up to three days after travel
Charging period	Monday to Friday, 07:00–18:00	Monday to Sunday, 07:00–22:00	Monday to Friday, 07:00–18:00 Saturdays, Sundays and bank holidays, 12:00–18:00

	Pre-pandemic scheme (up to 22 June 2020)	Temporary changes to the Congestion Charge from 22 June 2020	Proposed Changes
Non-charging days	Bank holidays, and the days between Christmas Day and New Year's Day (inclusive)	Christmas Day	Christmas Day to New Year's Day bank holidays (inclusive)
Residents' discount	90% for all residents following registration for discount	90% residents' discount closed to new applicants from 1 August 2020	90% for all residents following registration for discount (reopened to new applicants)
Reimbursements	NHS staff and patient reimbursement arrangements	NHS staff and patient reimbursement arrangements extended New reimbursement arrangements for care home workers working at care homes in the CCZ; and for charities' and local authorities' workers/volunteers providing certain services.	Extended NHS staff reimbursement arrangement NHS patient reimbursement arrangement expanded to patients vulnerable to risk of infection during any pandemic or epidemic prevalent in Greater London (this includes the COVID-19 pandemic). Reimbursement arrangements for care home workers working at care homes in the CCZ; and charities' and local authorities' workers/volunteers providing certain services during the COVID-19 pandemic expanded to any pandemic or epidemic prevalent in Greater London.

Option development and assessment

- 1.16. In developing the proposals set out below, TfL assessed a range of potential changes against their effectiveness in achieving the primary objective of the Congestion Charge: traffic and congestion reduction in support of the policies and proposals of the MTS. A summary of this option assessment was provided in the Supplementary Information⁴ presented as part of the consultation.

⁴ <https://haveyoursay.tfl.gov.uk/congestion-charge-changes>

2. Objectives and expected outcomes

- 2.1. In keeping the CC Scheme under review (as set out in MTS Proposal 20, described at section 1.6), TfL has had regard to a number of factors. Monitoring of car traffic in the CCZ in 2019 showed this was higher on Saturdays and Sundays (when cars and private hire vehicles (PHVs) made up 70 per cent of overall traffic) than on weekdays. Alongside the analysis of what will be needed to achieve long-term MTS objectives in central London, the persistent transport challenges arising from the pandemic and the likely scenarios for transport usage in London post-pandemic are important context and have also informed the proposals.
- 2.2. If approved by the Mayor, most of the Proposed Changes would come into effect on 20 December 2021. The exception is the changes to charging days and hours, which would be implemented on 21 February 2022 to allow time for new signage to be installed and back office functions to be updated. In particular, the changes to days and hours will necessitate the installation of new, replacement signs which are significantly larger than existing signs (owing to the need to display different charging hours for Monday to Friday compared to Saturday, Sunday and Bank Holidays). In a number of cases, this will require works to upgrade the associated poles and foundations for the signs and in others sign lengths need to be adjusted or electrical works carried out. There is also a manufacturing lead time on sign manufacture and sourcing of steel poles and a consolidation exercise to remove a number of older, more distant Advance Informatory CC signs which cannot be upgraded with the new hours. In the interim, the temporary charging days and hours introduced by MD2648 will remain in place. TfL originally proposed that the implementation date would be 28 February 2022 but following further discussion with the external suppliers who will undertake the necessary signage replacement work, a commencement date of 21 February 2022 is now being proposed.

Proposals and rationale for proposals

Proposal 1: A daily charge of £15

- 2.3. The current level of the charge is £15, having increased from £11.50 as a temporary measure in June 2020. The proposal is, therefore, to maintain the current charge level at £15 (the charge will also increase to £17.50 for those paying up to three days later – see Proposal 5).
- 2.4. Previous changes to the charge level, prior to the temporary increase introduced in June 2020, took effect in 2014, when it rose from £10 to £11.50; 2011, when it rose from £8 to £10; and 2005, when it rose from £5 to £8.
- 2.5. The period between 2014 to 2020 is the longest period in which no increase to the charge has been made, meaning there has been a gradual erosion of the charge's deterrent effect.
- 2.6. A £15 charge level is expected to reduce car traffic (measured in total kilometres driven) in the CCZ by around 4 per cent in the proposed new weekday charging hours (07:00 to 18:00), compared to a situation where no changes are made to the pre-pandemic scheme. A £15 charge in the proposed new weekend charging hours (12:00 to 18:00 Saturdays and Sundays) is expected to reduce car traffic by around 15 per cent. This is a significant reduction in an area where road space is heavily constrained and demand is high. The reduction in car usage is expected to result in an increase in sustainable travel to, within and from the CCZ with around 6,000 new trips made by public transport; and 2,000 new walking and cycling trips made each weekday.
- 2.7. If the Mayor were to approve this proposal, the change would take effect on 20 December 2021. As noted above, however, customers are in practice currently already paying a £15 charge under the temporary changes.

Proposal 2: Weekday charging from 07:00 to 18:00; weekend and bank holidays charging from 12:00 to 18:00

- 2.8. It is proposed that the charging hours would be Monday to Friday, 07:00–18:00; and Saturdays, Sundays and bank holidays, 12:00–18:00.

Weekday charging from 07:00–18:00

- 2.9. Prior to the implementation of the temporary changes, the charging hours were Monday to Friday, 07:00–18:00, with no charge at the weekends. This was changed to 07:00–22:00, seven days a week, following the introduction of the temporary changes in June 2020.
- 2.10. As highlighted in the MTS, traffic was at its highest in the evening after charging hours end. An increase in traffic after charging hours end is, to some extent, to be expected, as traffic is no longer disincentivised from driving in the CCZ. To decide the right end to the operating hours on weekdays, TfL has taken into account the changing and uncertain nature of current weekday travel patterns, as well as the impact of charging on the evening economy in central London. The cumulative impacts of the other Proposed Changes also need to be considered.
- 2.11. The proposed change would see weekday charging hours revert to the pre-pandemic hours of 07:00–18:00, from 21 February 2022. In the interim period, the charging hours of 07:00–22:00 on weekdays would remain in place.
- 2.12. This proposed change is not expected to impact traffic or congestion as compared to the pre-pandemic scheme, since the proposed charging hours would be the same. However, the cumulative impact of all the Proposed Changes, as well as changes made to the road network in central London to improve conditions for walking and cycling, could lead to changes in behaviour, with knock-on impacts for traffic levels in the CCZ in the evening.

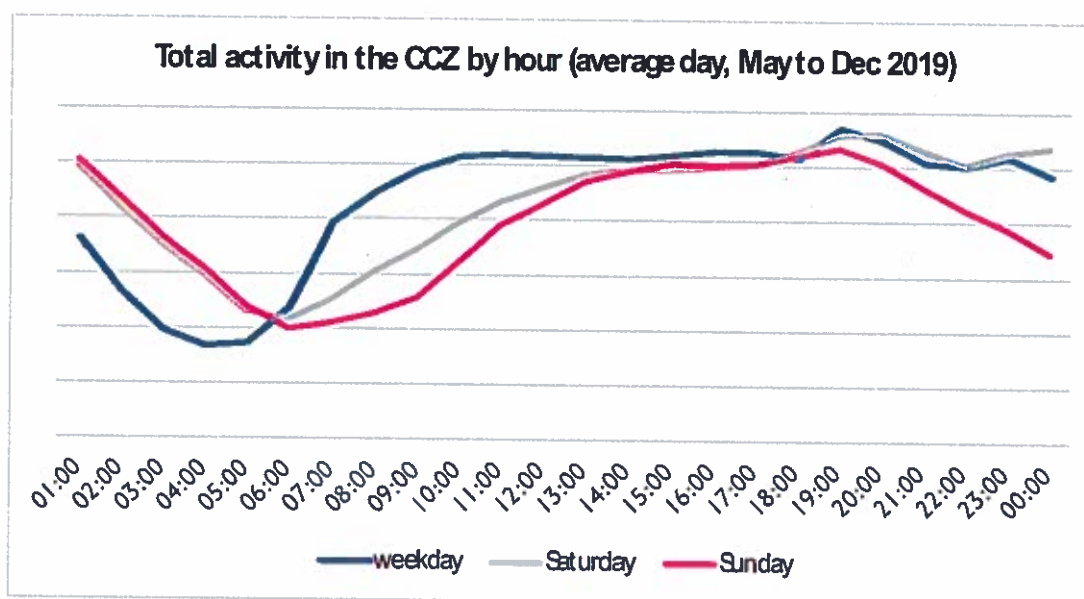
Weekend charging from 12:00–18:00

- 2.13. Prior to the implementation of the temporary changes, there was no charge at weekends. As part of the temporary package, Saturday and Sunday charges were introduced for the same hours as the temporary weekday charging hours: 07:00–22:00. It is now proposed that from 21 February 2022, weekend charging hours would be from 12:00–18:00 on Saturdays and Sundays, when traffic is at its highest.
- 2.14. As highlighted in the MTS, in 2015 weekend traffic levels in the CCZ were already similar to weekdays.⁵ High traffic levels at the weekends delay bus services and other essential traffic such as freight; make walking and cycling unpleasant and unattractive; worsen air quality and carbon emissions; and lead to increased road danger. The hours in which this increased traffic is observed do, however, differ at the weekends. Although entries to the zone have been higher on Saturdays and Sundays compared to an average weekday, overall traffic levels are lower on weekend mornings (as shown in Figure 1, below). Given the different types of journey, and the times journeys are made at weekends compared to weekdays, shorter charging hours are being proposed at the weekend. This is expected to help mitigate the impact on some individuals, while tackling traffic and congestion during the busiest part of the day.
- 2.15. Shorter hours of operation at the weekend could also help to support freight trips that have a positive impact on London's weekend economy.
- 2.16. A £15 charge between 12:00 and 18:00 on Saturdays and Sundays is expected to reduce car traffic (measured in total kilometres driven) in newly charged hours by around 15 per cent. As a result, sustainable travel to and in the CCZ is expected to increase. It is estimated that there will be around 8,000 new public transport trips; and a total of 3,000 new walking and cycling trips each day on the weekend.
- 2.17. The changes to the weekend charge would be implemented on 21 February 2022 to allow changes to signage and back office systems. These changes would replace the temporary

⁵ See Figures 8 and 9 in MTS, 2018: www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf.

weekend charging hours. In the interim period, the charging hours of 07:00–22:00 on Saturdays and Sundays would remain in place.

Figure 1: Total activity by hour on Saturdays, Sundays and average weekday in CCZ



Bank holiday charging from 12:00–18:00

- 2.18. Prior to the introduction of the temporary changes in 2020, the Congestion Charge did not apply on bank holidays. However, data from 2019 shows that car and PHV traffic was higher on bank holidays than on an average weekday. Without a charge, there is reduced incentive for these trips to be switched to sustainable modes.
- 2.19. On bank holidays, there are likely to be higher proportions of visitors and leisure trips (reflected in the higher car mode share). These can more easily be switched than some other types of trip – such as freight, delivery and servicing – and a charge will reinforce the message that central London road space is tightly constrained across all days of the week. Charging the majority of bank holidays also means that for most of the year, the Congestion Charge will operate seven days a week.
- 2.20. The data shows that traffic entries on a bank holiday occur later in the day than on weekdays, and so it is proposed that the charging hours are 12:00–18:00. This is later and for a shorter period than weekdays, and mirrors the proposed weekend charging hours.
- 2.21. The impact of the proposal is likely to be similar to that expected at the weekends, with a reduction of around 15 per cent in car kilometres in the newly charged hours with a £15 charge.
- 2.22. If this change is confirmed, it would take effect on 21 February 2022. In the interim period, the charging hours of 07:00–22:00 on bank holidays would remain in place (albeit the only bank holidays between the Mayor's decision and 21 February 2022 are Christmas Day and New Year's Day, both of which are proposed to be non-chargeable, as described below).

Proposal 3: No charge between Christmas Day and New Year's Day bank holidays (inclusive)

- 2.23. Prior to the introduction of the temporary changes, the Congestion Charge did not operate during the period between Christmas Day and New Year's Day (inclusive). The package of temporary changes introduced in summer 2020 extended charging days to include this period.
- 2.24. It is now proposed that the period between Christmas Day and New Year's Day bank holidays, inclusive (including where this falls later than 1 January due to New Year's Day falling on a

weekend), will not be charged, meaning that the situation returns to that which existed pre-pandemic.

- 2.25. Unlike bank holidays (when traffic is at a similar or greater level than during working days), traffic levels are normally around 20 per cent lower during the period between Christmas Day and New Year's Day. Public transport is not available on Christmas Day; and, given the lower traffic levels, trips in the CCZ are likely to have less of an impact on congestion. There is not expected to be a traffic impact from this proposal compared to the pre-pandemic scheme.
- 2.26. If the Mayor decides to implement this change, it would take effect on 20 December 2021 meaning that the period from Saturday 25 December 2021 to Monday 3 January 2022 (inclusive) would not be charged.

Proposal 4: 90 per cent residents' discount, open to all eligible applicants

- 2.27. Residents in the CCZ who are registered for the residents' discount receive a 90 per cent discount on the Congestion Charge. This is recognition of the fact that they are unable to avoid the CCZ if they need to drive during charging hours, and their vehicle does not qualify for any other discounts or exemptions. Requiring residents to pay a small proportion of the charge reinforces the message about the need to use constrained roads in central London effectively, and to use other modes where possible. This was the main rationale for the discount when the scheme was introduced in 2003. The discount needs to be renewed on an annual basis and is subject to a renewal fee. Currently less than 25 per cent of central London households own a car.
- 2.28. As part of the temporary changes made in 2020, the residents' discount was closed to new applicants from 1 August 2020. This change, made in response to the transport challenges created by the COVID-19 pandemic, aimed to deter residents who had not driven in the CCZ prior to the pandemic from doing so, in order to avoid a car-led recovery. Residents who were already registered for the residents' discount prior to this date and renewed their discount remained eligible.
- 2.29. The original rationale for the discount continues to apply. If charging hours are implemented at weekends, there will be even fewer opportunities to avoid the charge. It is, therefore, proposed to retain the residents' discount at the pre-pandemic level and reopen it to new applicants.⁶
- 2.30. If the level of charge is increased to £15 (see above), registered residents will pay an equivalent daily charge of £1.50 instead of £1.15 pre-June 2020 (or instead of £1.05, if they had previously paid by Auto Pay).
- 2.31. There is not expected to be a noticeable traffic impact from this proposal as compared to the pre-pandemic scheme. There may be some small impact on residents' travel behaviour from the introduction of charges at the weekend and higher charge levels.
- 2.32. If the Mayor were to approve this proposal, the change would come into effect on 20 December 2021.

Proposal 5: £17.50 charge level to pay after the day of travel with the deadline for payment extended to three days after travel

- 2.33. The current charge for late payments is £17.50, having increased from £14 as a temporary measure in June 2020. The proposal is therefore to maintain the current charge level, to pay after the day of travel at £17.50; and to increase the deadline for making a delayed payment from one day to three days after the day of travel. Failure to pay after that deadline will result in a penalty charge notice (PCN) being issued, as usual.

⁶ Information about eligibility criteria and how to apply for the discount can be found here: <https://tfl.gov.uk/modes/driving/congestion-charge/discounts-and-exemptions>

- 2.34. This proposal provides drivers with additional time to pay the charge. It also ensures that the level is set in line with the proposed charge increase; and with the existing difference between the on-the-day charge and the pay-next day-charge (£2.50 difference, with payment due by midnight the day after travel).
- 2.35. If the Mayor were to approve this proposal, the change would come into effect on 20 December 2021.

Proposal 6: Removing Auto Pay and Fleet Auto Pay discounts

- 2.36. Auto Pay for private drivers was introduced in 2011 following customer feedback. This introduction was in the context of removing the discount for monthly and annual charges that had thus far been available. Auto Pay is easier for users and reduces costs to TfL. To encourage people to sign up for this method of payment following its introduction, a £1 discount was given. The discount has been successful in encouraging people to sign-up for Auto Pay, with more than three-quarters of customers paying in this way.
- 2.37. Payment accounts for commercial vehicles pre-date the introduction of Congestion Charge Auto Pay (CC Auto Pay), with a Fleet Scheme available at the start of the CC Scheme (later replaced by Fleet Auto Pay). With Fleet Auto Pay, registered operators of 10 or more vehicles received a £1 discount on the daily charge. This was introduced to offer a comparable discount to that available for drivers who chose to pay the charge monthly or annually. When CC Auto Pay was introduced, this approach was retained and also applied to Fleet Auto Pay (at the same time, the minimum level for Fleet Auto Pay account was reduced from 10 to six vehicles).
- 2.38. A benefit of Auto Pay is that it removes the risk of incurring a PCN for forgetting to pay the charge. A £1 discount for using Auto Pay was introduced to incentivise people to adopt this form of payment. At present, 76 per cent⁷ of customers pay the Congestion Charge via Auto Pay.
- 2.39. The fact that most customers now use Auto Pay indicates that the discount has achieved its objective of incentivising this payment method, and is no longer necessary. Removing the discount also reinforces the message that access to road space in central London should not be discounted for those who are liable to pay the full charge.
- 2.40. Even without the discount, customers would continue to benefit from choosing to pay via Auto Pay as it is the most straightforward payment method, given it removes the administrative burden of paying daily charges; and mitigates the risks of having to pay a higher charge after the day of travel, or incurring penalty charges for failing to pay.
- 2.41. If the Mayor were to approve this proposal, the change would come into effect on 20 December 2021.

Proposal 7: Retaining and adapting temporary reimbursement arrangements

- 2.42. A 100 per cent reimbursement arrangement for certain NHS staff and patient journeys in the CCZ has been available since the establishment of the CC Scheme in 2003.
- 2.43. As part of the temporary changes implemented in Summer 2020, the eligibility criteria for the NHS staff and NHS patient reimbursement arrangements were temporarily expanded so that a broader range of journeys came within scope. The changes also introduced new reimbursements for certain care home and local authority workers, and charity staff and volunteers. TfL reimburses eligible applicants fully for the charge they initially paid.
- 2.44. The care home workers' reimbursement arrangement applies to journeys made by staff so that they can provide services during the COVID-19 pandemic on behalf of a care home located in the CCZ. The criteria for the local authorities' and charities' reimbursement arrangements were

⁷ Based on Congestion Charge payment activity for January to May 2021, on average around 76 per cent of customers paid via Auto Pay.

developed following engagement with local authorities and charities. They apply to local authority employees; domiciliary care workers contracted or funded by local authorities; and charity staff and charity volunteers who are undertaking journeys to directly support vital COVID-19 response work within the CCZ. The criteria also covers journeys made to support the provision of nursing or care services for people who are vulnerable in general, or at particular risk of COVID-19.

- 2.45. Under the new proposals recently consulted on, the NHS patient, care home workers, and local authorities and charities reimbursement criteria would be modified so that COVID-19-specific references were replaced with general references to a pandemic or epidemic prevalent in Greater London. The existing reimbursement arrangements would continue seamlessly if the Proposed Changes are implemented so reimbursements would remain available for eligible journeys taken during the current COVID-19 pandemic as well as any future epidemics or pandemics should they ever arise.
- 2.46. The NHS staff reimbursement arrangement would continue in its slightly expanded form so that staff do not need to be on call when making their journey, nor be eligible for reimbursement of other travel expenses as part of their employee terms and conditions, in order to claim a reimbursement of the congestion charge during exceptional circumstances created by an epidemic or pandemic. As with the other reimbursement arrangement, the member of staff is reimbursed by the NHS which is in turn reimbursed by TfL.
- 2.47. These reimbursements are expected to have a positive impact on specific groups in the exceptional circumstances created by an epidemic or pandemic, but are not expected to have any significant traffic impacts.
- 2.48. If the Mayor were to approve this proposal, the changes would come into effect on 20 December 2021.

Proposal 8: Removal of residents' online and app payment facilities for consecutive charging days

- 2.49. Holders of the residents' discount can currently pay for multiple consecutive charging days by post, call centre, app or online; they may also pay for any number of charging days by Auto Pay.
- 2.50. It is proposed that residents' payments for multiple consecutive charging days will no longer be accepted online or via the app. Such payments could still be made by post or via the call centre, and residents would still be able to pay for any number of individual charging days by Auto Pay. No change is proposed to the 90 per cent residents' discount (see Proposal 4, above, related to its reopening to new applications).
- 2.51. The number of residents who do not use Auto Pay is relatively small, and the frequency of purchases of multiple consecutive charging days is low.⁸ Alternative payment channels will remain available; therefore, this proposal is not expected to have a significant impact on holders of the residents' discount.
- 2.52. For completeness, it should be noted that no change was made to this facility as part of the temporary changes introduced in Summer 2020.
- 2.53. If this change is confirmed, it would take effect on 20 December 2021.

3. Equality comments

- 3.1. Under section 149 of the Equality Act 2010 (the Equality Act), as public authorities, the Mayor and TfL must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; and to advance equality of opportunity, and foster good relations, between people

⁸ In September 2021, less than 1 per cent of resident charges were purchased via channels other than Auto Pay.

who share a protected characteristic and those who do not when exercising their functions. This is known as the Public Sector Equality Duty. Protected characteristics under the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status (the duty in respect of this last characteristic is to eliminate unlawful discrimination and other prohibited conduct under the Act only). In line with best practice, the impact on groups who also have the potential to be socially excluded – in this case, people on low incomes or from deprived communities – has also been considered, notwithstanding that these specific attributes are not protected under the Equality Act but may be common to people with protected characteristics.

- 3.2. The Public Sector Equality Duty applies to the Mayor's decision to proceed to implement the Proposed Changes by confirming the Variation Order.
- 3.3. TfL commissioned consultants Jacobs to undertake an IIA. The impacts identified are based on a comparison of the Proposed Changes and the pre-pandemic CC Scheme (rather than the CC Scheme as temporarily changed in June 2020 in response to the circumstances created by the COVID-19 pandemic). This methodology ensures that the IIA assesses the full potential impact of the Proposed Changes and removes the distortion that would have resulted in assessing a proposal that is the same as a temporary change. The complete IIA formed part of the consultation materials and is attached, appended, to the Report to the Mayor (at Appendix 1).
- 3.4. The objectives and assessment for the IIA undertaken by Jacobs were split into three themes: London's people (including health and equalities assessment); London's economy; and London's environment. The people category includes an assessment of protected characteristic groups, enabling Jacobs to assess how the proposals could impact each of these groups. The IIA found that there are anticipated to be some impacts, both positive and negative, to individuals with protected characteristics.
- 3.5. Full details of the impacts are given in the IIA and are summarised below. Section 4, below, summarises consultation which concerned the impacts of the Proposed Changes (including on protected characteristic groups) and the IIA. A summary of the impacts (other than on protected characteristics) is given in Appendix 3 (reproduced from the IIA).

Using the IIA to develop and consider the proposals

- 3.6. In developing the proposals, TfL carefully considered the potential impacts as identified by the IIA (including those on groups with protected characteristics), alongside the likely impacts on traffic and congestion, and the other objectives of the MTS. This enabled a consideration in the round of the potential benefits and disbenefits of the proposals. Additionally, TfL has considered the issues raised by respondents to the consultation, some of which reflect the findings of the IIA and some of which raise further issues.
- 3.7. As outlined above, both positive and negative impacts from the Proposed Changes have been identified, and Jacobs has put forward potential mitigations. Impacts and mitigations are discussed in more detail – and in the context of the responses received to the consultation – in Section 4, below.

Age

- 3.8. The IIA identified minor positive impacts for young people and children, and for older people, as a result of an improvement to air quality. It also identified minor positive impacts for older people in terms of connectivity, accessibility and social integration as a consequence of greater uptake of active travel and faster bus-journey times. Both older and younger people could experience a minor positive impact from the reduction in traffic and its consequent benefits in terms of safety and perceptions of safety.
- 3.9. The IIA identified a neutral impact on older people in terms of their access to healthcare in the CCZ, noting that this group may need to make more trips for this purpose; but also that, where

these are undertaken by car, discounts and reimbursements may apply. It identified a neutral impact on children and young people accessing education, based on the fact that there are education facilities (including those associated with religious activities) in the CCZ. It also identified that many of these facilities only offer parking to disabled people (thereby limiting the numbers of trips by car); most trips can be switched to public transport or active travel; and for students whose trips originate in areas of low public transport availability, there would be the option to drive to a station and continue the journey into the zone by public transport.

- 3.10. In terms of potential negative impacts, the IIA identified a minor negative impact on older people who are dependent on car-based informal care services. It also identified a minor negative impact on young people in terms of crime reduction and community safety, as they may not feel safe using public transport if they switch from regular car use.

Disability

- 3.11. The IIA identified minor positive health impacts for disabled people with chronic conditions who live and travel within the CCZ, due to the reduction in pollutant emissions with the Proposed Changes in place. Reductions in noise levels may have differential beneficial impacts for disabled people who are hypersensitive to loud sounds, such as those with autism.
- 3.12. The IIA identified minor positive impacts for disabled people in terms of maximising accessibility by bus, although there could also be minor negative impacts from bus crowding.
- 3.13. The IIA identified a neutral impact on disabled people in terms of their access to healthcare in the CCZ, noting that this group may need to make more trips for this purpose; but also that, where these are undertaken by car, discounts and reimbursements may apply.
- 3.14. The IIA identified minor negative impacts for disabled people who travel in the CCZ by car but do not qualify for discounts or exemptions (e.g. a Blue Badge), and for disabled people who rely on car-based informal care services.
- 3.15. In terms of crime reduction and community safety, it identified minor negative impacts for disabled people if they switch to public transport as a result of the changes, if they feel less safe using this mode than the car. It identified minor positive impacts for disabled people from a potential reduction in road traffic collisions, as this group is more likely to use active travel modes including public transport.

Sex

- 3.16. The IIA identified that women could experience minor positive impacts in terms of travelling by bus (as they have a greater propensity to use this mode), although there could be minor negative impacts from crowding. It identified minor negative impacts for women if they switch from car to public transport and feel less safe using those modes of travel.
- 3.17. The IIA also identified a potential minor negative impact to some PHV drivers (those that work for PHV operators who are not able to change their fares in response to changes). This would be experienced differentially by women PHV drivers who are more likely to work part-time.

Race

- 3.18. The IIA identified minor positive benefits for people from Black, Asian and Minority Ethnic (BAME) groups as a result of the improvements to air quality brought about by the proposals. This group is more likely to be exposed to and/or affected by poor air quality. There are also minor positive impacts in terms of the experience of using buses for this group.
- 3.19. In terms of crime reduction and community safety, the IIA identified minor negative impacts if people chose to switch to public transport and felt less safe doing so; and potential minor positive effects in terms of reduced road traffic collisions. The IIA also identified a potential minor

negative impact to some PHV drivers (those that work for PHV operators who are not able to/do not change their fares in response to changes).

Pregnancy and maternity

- 3.20. The IIA found a minor positive impact on pregnant women from improvements to air quality, and a neutral impact on public transport accessibility for this group.
- 3.21. The IIA identified a neutral impact on pregnant women in terms of their access to healthcare in the CCZ, noting that this group may need to make more trips for this purpose but also that, where these are undertaken by car, discounts and reimbursements may apply.

Religion or belief

- 3.22. The IIA identified minor negative potential impacts, owing to increased cost of access to attend religious services during weekend charging hours in the CCZ for those unable to travel by public transport or attend at other times.
- 3.23. It noted that these impacts were likely to be short-term as people shifted to other modes for their journeys, and/or changed time of travel.

Gender reassignment

- 3.24. The IIA identified no particular impact to this group in relation to section 149 of the Equality Act.

Sexual orientation

- 3.25. The IIA identified no particular impact to this group in relation to section 149 of the Equality Act.

Other impacts

- 3.26. The IIA also identified other likely significant impacts relevant to protected characteristics. It noted that there could be a short-term minor negative impact on people who are more vulnerable to coronavirus owing to underlying medical conditions, if these people are travelling by public transport.

Deprivation

- 3.27. The IIA identified potential impacts on people on low incomes. These include a minor positive impact from improved air quality for groups living in deprived areas and their experience of using buses. The potential impact on this group if access by PHV became more expensive was assessed as: neutral where there is a choice to use a larger operator; and minor negative where there is a reliance on smaller operators, which are less able to spread costs among customers.
- 3.28. The IIA noted an impact on low-income groups who need to access health and care, but that overall this is likely to be neutral as there is a range of available travel options other than the car, and some discounts and exemptions to the charge apply. It identified a minor negative impact on people working at weekends and commuting by car in lower-paid sectors such as retail, hospitality and leisure. The IIA also identified a potential minor negative impact to some PHV drivers (those that work for PHV operators who are not able to change their fares in response to changes).

4. Other considerations

Consultation and impact assessments

- 4.1. A full consideration of the consultation responses is included in the Report to the Mayor (Appendix 1) which should be read in conjunction with this form.

- 4.2. The first Mayor of London issued statutory guidance to TfL entitled 'Guidance from the Mayor of London on charging schemes pursuant to schedule 23 of the Greater London Authority Act 1999', to which TfL is required to have regard when exercising its road user charging powers. The proposed amendments constitute a major variation to a scheme for the purposes of that Guidance. As is suggested in the Guidance, a 10-week consultation was undertaken by TfL on the Proposed Changes between 28 July 2021 and 6 October 2021.
- 4.3. The consultation was hosted on TfL's online consultation portal.⁹ The following information was made available:
- introductory and general information on TfL's consultation webpage (Appendix B to the Report to the Mayor at Appendix 1)
 - a summary of the proposals
 - a Scheme Description and a Supplementary Information document providing greater detail about the consultation proposals (Appendix A to the Report to the Mayor at Appendix 1)
 - an IIA, carried out by Jacobs, that considers the likely health, equality, economic and business, and environmental impacts of the consultation proposals (Appendix C to the Report to the Mayor at Appendix 1)
 - the Variation Order (Appendix 2)
 - a copy of the Consultation Questionnaire (Appendix B of the Report to the Mayor).

Impact assessments (other than equalities)

- 4.4. The expected impacts (other than equalities; see section 3, above) are reproduced in summary form at Appendix 3, and are taken from the IIA undertaken by Jacobs. As was the case for equalities impacts, the impacts set out here are based on a comparison with the pre-pandemic CC Scheme.
- 4.5. The IIA was informed by traffic analysis undertaken by TfL using their suite of strategic transport models and bespoke road user charging tool. The impacts have been assessed against two future forecasts: the Reference Case and the Hybrid forecast (see section 1.11, above).
- 4.6. As described there and in the Supplementary Information, TfL's modelling shows that, unless action is taken, car traffic levels are likely to continue to increase, exacerbating the long-term challenges already identified.
- 4.7. The IIA was split into three categories: London's environment, London's people, and London's economy. Within these categories, the assessment was divided into a number of topics. The discussion of impacts below is structured by category, and topics within.

Consultation process

- 4.8. TfL used a variety of channels to raise awareness of the consultation. These are described in the Report to the Mayor (Chapter 3) and summarised below:
- a press release was issued on 28 July 2021 to announce the start of the consultation; the consultation received media coverage from a number of outlets
 - press adverts were placed in a variety of London media titles and there were features on the consultation in the Metro TfL travel pages; adverts were also featured in digital display adverts during the consultation

⁹ <https://haveyoursay.tfl.gov.uk/congestion-charge-changes>

- advertising on digital radio
 - a notice was also published in the London Gazette regarding the making of the Variation Orders and the consultation period on 28 July 2021
 - targeted communications to registered Congestion Charge and other TfL customers; in total, TfL sent emails to around 1.2m recipients
 - postcard leaflets were sent to residents in the CCZ
 - stakeholder groups including London boroughs in the CCZ, freight stakeholders, and taxi and PHV representatives were contacted by email
 - meetings were held with stakeholders (see list in the Report to the Mayor that is attached to this form at Appendix 1).
- 4.9. In addition, Jacobs held a number of stakeholder workshops to inform the IIA. Workshops were held on the themes of: business and economy, environment and health and equalities. A list of the workshop attendees is provided in Appendix G of the IIA, which is appended to the Report to the Mayor (Appendix 1 to this form).
- 4.10. Respondents to the consultation were asked to complete and submit an online questionnaire to provide their feedback about the proposals. It included a number of open and closed questions, providing an opportunity for respondents to indicate their views about each of the proposals and ideas, and give additional comments and feedback. TfL offered a number of ways for respondents to respond:
- online – through the consultation portal
 - e-mail – comments e-mailed directly to TfL
 - post – by letter or return of hard copy of questionnaire.
- 4.11. Easy-read versions of the survey and the summary material were also available online.
- 4.12. TfL commissioned AECOM, an independent consultancy, to analyse the consultation responses. All closed questions were reviewed, and the results tabulated and reported. All open questions, where respondents provided comments, were read and analysed in detail.
- 4.13. AECOM developed a 'code frame' for each of the open questions. Each code frame is a list of the issues raised during the consultation, together with the frequency with which each issue was raised.
- 4.14. The remainder of this section is an overview of the responses received to the consultation. This is intended only as a summary. A detailed quantitative analysis of the public and stakeholder responses is set out in Chapter 4 of the Report to the Mayor (Appendix 1) and in AECOM's report (which is appended to the Report to the Mayor).
- 4.15. Chapter 5 of the Report to the Mayor provides more detail on the responses, including a qualitative analysis of the comments made via the survey or other means. It also sets out TfL's detailed response to these issues. Full qualitative analysis of the consultation is included in AECOM's report.

Responses received

- 4.16. A total of 9,680 responses were received, of which 92 were from stakeholders.

- 4.17. AECOM's analysis indicated that there has been a small campaign amongst churchgoers: 53 emails were received that were very similar in response, and that opposed Sunday charging. A separate petition, signed by 43 people, opposed weekend and bank holiday charging.
- 4.18. Copies of all consultation responses have been made available to the Mayor.

Responses to proposals

- 4.19. This section summarises the responses received to the proposals, with the responses to closed questions on the questionnaire given where relevant. It also summarises the main issues raised in relation to each proposal, drawing on Aecom's analysis of the text in the two comment boxes from the open questions in the questionnaire.
- 4.20. It should be noted that, as respondents were not obliged to answer all questions in the questionnaire, the percentages shown only include those that responded to each question, and this denominator will therefore vary by question. Overall, of the 9,680 respondents, 6,732 made comments in response to the open questions.
- 4.21. The first two closed questions concerned the importance of taking action to achieve certain outcomes in central London. In answer to the first question, "How important is it to you that we take steps to reduce traffic and congestion in central London?", 11 per cent of respondents felt it was not important to take steps to reduce traffic and congestion in central London. All other respondents with an opinion considered it was important on a range from slightly important to very important.
- 4.22. In answer to the second question, "How important is it to you that we increase the number of people walking, cycling and using public transport?", 76 per cent of respondents to this question said it was important¹⁰ to take steps to increase the number of people walking, cycling and using public transport in central London; 22 per cent felt that it was not at all important; and 2 per cent had no opinion.

Proposal 1: A daily charge of £15

- 4.23. For the question on the effectiveness of the proposed Congestion Charge level,¹¹ 51 per cent of respondents thought that it would have a moderate or major effect in delivering the aims of the Congestion Charge,¹² while 44 per cent of respondents thought it would have a minor or no effect.
- 4.24. The comment that the proposed charge level is too high was among the 10 most frequently raised issues in the comment boxes on the questionnaire.
- 4.25. The boroughs in the CCZ that responded to the consultation – Westminster City Council, LB Islington, LB Camden and the City of London – supported this proposal. It was opposed by small businesses, the Federation of Small Businesses and Logistics UK. Transport and environment organisations including the London Cycling Campaign (LCC), London Living Streets, and the London Forum of Amenity and Civic Societies supported the charge increase.
- 4.26. TfL has considered and responded to these issues raised in Table 23 in the Report to the Mayor (Appendix 1).

Proposal 2: A charge period of 07:00 to 18:00 from Monday to Friday; and 12:00–18:00 on Saturdays, Sundays and bank holidays

¹⁰ Sum of respondents selecting "very important", "fairly important", "important" and "slightly important".

¹¹ "How effective do you consider the following proposed changes to the Congestion Charging scheme would be in achieving our aims set out above?" Options to answer were: "no effect", "minor effect", "neutral", "moderate effect" and "major effect".

¹² The aims of the Congestion Charge are to reduce traffic and congestion in central London and help achieve the objectives of the MTS.

- 4.27. Sixty-two per cent of respondents to this question thought the effectiveness of the proposed weekday charging period of 07:00–18:00 would be moderate or major, with 34 per cent indicating no or a minor effect.
- 4.28. Forty-five per cent of respondents to this question thought charging between 12:00 and 18:00 on Saturdays and Sundays and on bank holidays would have a moderate or major effect, while 50 per cent thought it would have no or a minor effect.
- 4.29. Both support for the proposed weekday charging hours and opposition to weekend charging were among the 10 most frequently raised issues in the comment boxes on the questionnaire.
- 4.30. For the changes to weekday charging hours, Westminster City Council, LB Islington and the City of London were supportive of the proposals, saying that they would help with London's recovery. LB Camden and LB Tower Hamlets opposed this change, saying it would encourage car use in the zone and undermine the MTS objectives. Small businesses broadly welcomed the reduction in weekday charging hours to 18:00 as a way of supporting London's economy. The Musicians' Union called for charging hours to end at 17:00.
- 4.31. The response to weekend charging and bank holiday charging was very mixed. The London Chamber of Commerce and Industry supported the changes to weekday hours, but not the weekend charging proposal.
- 4.32. The City of London and Westminster City Council opposed weekend and bank holiday charging. Comments covered the lower levels of traffic at these times and the need to support the leisure economy. Business groups and businesses largely opposed this proposal, stating that it would hamper economic recovery.
- 4.33. These proposals were supported by London TravelWatch and London Living Streets, which called for charging to continue until 22:00, seven days a week, as a means of reducing air pollutants and carbon emissions and contributing to Vision Zero.
- 4.34. A large number of religious organisations (mostly churches) in the zone responded to the consultation stating their opposition to weekend charges. Most of the comments related to Sundays, but some also opposed to Saturday charging. Comments covered the adverse impacts on the charge on protected characteristics: faith and religious belief; younger people and older people; and BAME groups. More information on comments made in relation to the impacts on protected characteristics is provided in a separate section below.
- 4.35. Respondents in this group stated that it was difficult for some members to use public transport, and that it was difficult to reschedule activity associated with religious services such as lunch clubs and charity activity. One respondent stated that it held several services on Sundays, in different languages. Some respondents said that the cost of the charge would result in less money being available for their charitable activities.
- 4.36. Some of these respondents said that a later start time (13:00 or 14:00) would mitigate these impacts. There were also comments calling for a discount for churchgoers and for an extension of the reimbursement scheme to churches and their charitable activities.
- 4.37. TfL has considered and responded to these issues raised in Table 24 in the Report to the Mayor (Appendix 1).

Proposal 3: No charge between Christmas Day and New Year's Day bank holidays (inclusive)

- 4.38. There was no specific closed question on this proposal. In the open questions, two per cent of respondents who made a comment stated their support for this proposal (comments in opposition made up less than half of one per cent).

Proposal 4: 90 per cent residents' discount, open to all eligible applicants

- 4.39. For the question on the effectiveness of the proposals for the residents' discount, 52 per cent of respondents thought it would have a moderate or major effect in delivering the aims of the Congestion Charge. This is in contrast to 36 per cent of respondents who indicated they thought it would have no or a minor effect.
- 4.40. Comments in support of this proposal were among the ten most frequently raised issues in the comment boxes on the questionnaire.
- 4.41. Borough & Bankside Ward (Southwark) councillors; Caroline Pidgeon AM; Keith Prince AM; Westminster City Council; and LB Islington welcomed the reopening of the residents' discount. Sian Berry AM said that the residents' discount should be available only to those who really need it.
- 4.42. The proposal was opposed by London Living Streets and the LCC.
- 4.43. TfL has considered and responded to these issues raised in Table 25 in the Report to the Mayor (Appendix 1).

Proposal 5: £17.50 charge level to pay after the day of travel with the deadline for payment extended to three days after travel

- 4.44. For the question on the effectiveness of the proposal to increase the delayed payment, and extend the timeframe to pay it, 42 per cent of respondents thought it would have a moderate or major effect; 48 per cent thought it would have a minor or no effect.
- 4.45. This proposal was supported by Westminster City Council, LB Islington and LB Camden. LB Tower Hamlets said it would have a minor effect.
- 4.46. The London Private Hire Car Association said that this would be further cost to an already struggling industry. The Road Haulage Association said it would have no effect.
- 4.47. TfL has considered and responded to these issues raised in Table 26 in the Report to the Mayor (Appendix 1).

Proposal 6: Removing Auto Pay and Fleet Auto Pay discounts

- 4.48. For the question on the effectiveness of the proposal for Auto Pay and Fleet Auto Pay, 36 per cent of respondents thought it would have a moderate or major effect, while 50 per cent thought it would have a minor or no effect.
- 4.49. The proposal was supported by: London Living Streets; Westminster City Council; LB Camden; LB Islington; and Sian Berry AM.
- 4.50. It was opposed by Keith Prince AM on behalf of the GLA Conservative Group; the London Chamber of Commerce and Industry; Addison Lee; and the British Vehicle Rental and Leasing Association.
- 4.51. TfL has considered and responded to these issues raised in Table 27 in the Report to the Mayor (Appendix 1).

Proposal 7: Reimbursement arrangements for NHS patients who are vulnerable to risk of infection; care home workers working at care homes in the CCZ; and local authority or charity workers and volunteers providing certain services in relation to the COVID-19 pandemic would be updated so that they apply during epidemics or pandemics prevalent in Greater London (which includes the current COVID-19 pandemic). The expanded NHS staff reimbursement would also continue.

- 4.52. Sixty-four per cent of respondents to this question thought it was very or fairly important that we have reimbursement arrangements for NHS staff and patients, care home workers, certain local

authority workers, domiciliary care workers and charities during pandemics and epidemics in Greater London; 21 per cent thought it was only slightly or not at all important.

- 4.53. This proposal was supported by: Caroline Pidgeon AM; Westminster City Council; LB Islington; and the London Ambulance Service.
- 4.54. The Independent Healthcare Network and HCA Healthcare UK stated that this reimbursement should also be available for private healthcare.
- 4.55. TfL has considered and responded to these issues raised in Table 28 in the Report to the Mayor (Appendix 1).

Proposal 8: Removal of residents' online and app payment facilities for consecutive charging days

- 4.56. There was no specific closed question on this proposal. A very small number – less than half of one per cent of comments – opposed this proposal.

Issues raised concerning the impact of the proposals on protected characteristics

- 4.57. As set out in section 4.34, above, some religious organisations commented on the impacts of weekend charges on the protected characteristic of religion or belief. Within that group, potential impacts on younger and older people, and on some BAME groups, as a result of the changes were also cited.
- 4.58. These impacts were said to arise because of the additional costs of travelling to church on a Sunday. It was also stated that there would be a knock-on effect in terms of the charitable activities (which often benefit older, younger and low-income groups) that organisations could undertake. Respondents stated that many churches were only just beginning to regain congregations and income following the pandemic.
- 4.59. One respondent providing services in a number of languages raised the difficulty in rescheduling services in order to avoid the charge. Other respondents highlighted charitable and community activities at times adjacent to the main service (also making it difficult to reschedule); in some cases this also involved transporting younger or older people to and from these activities. It was also stated that some of these activities involve transporting heavy equipment, making it impossible to shift to other types of transport.
- 4.60. One respondent, disputing the findings of the IIA in respect of religion or belief, stated that the potential impacts were not minor; and that the IIA had not considered the full range of social and charitable activities associated with religious belief.
- 4.61. Keith Prince AM, on behalf of GLA Conservatives, said that weekend charging was unlikely to meet obligations with the Equalities Act and the Disability Discrimination Act, and moral obligations to faith groups. GMB Union said that there were impacts on low-paid groups including PHV drivers and food delivery drivers.
- 4.62. The Licensed Private Hire Car Association also outlined that it is currently unable to meet the demand for PHVs. It highlighted the role that PHVs play in providing transport for elderly, disabled and vulnerable people, for whom walking, cycling or using public transport may not be an option.
- 4.63. There were also comments that the proposals would have a negative impact on older people, disabled people and the vulnerable (which may include people with protected characteristics).
- 4.64. TfL has considered and responded to these issues raised in Table 18 in the Report to the Mayor (Appendix 1). In light of stakeholder feedback (notably from faith groups, churches and other religious organisations) and at the request of the Mayor, TfL further considered the proposed Sunday charging hours and the alternative proposal that Sunday charging commence at 13:00 instead of 12:00. A note of this review is included at Appendix 4. TfL has concluded that traffic data supports the original proposal that Sunday charging hours should be between 12:00 and

18:00 and that the impacts are proportionate given the aim of the proposal is to ensure the CC Scheme remains effective in achieving its objectives and furthering the delivery of the MTS. The approach to setting the hours is consistent with the approach adopted on weekdays. In TfL's view, the impacts on people with protected characteristics are mitigated to a reasonable extent including through the exemptions and discounts which are offered as part of the CC Scheme, the free charging window before noon and other travel options including making use of the extensive public transport network and travel concessions.

Issues frequently raised other than those directly related to the Proposals

4.65. In addition to the closed questions on the questionnaire, two open questions provided the opportunity for respondents to make comments on the proposals. Some of the most frequently raised issues (among the ten most often-raised issues) concern the proposals themselves and have been described above. The remainder are as follows:

- [negative] impacts on business and the economy
- [the proposals are] a money-making exercise for TfL
- congestion is caused by Streetspace and other schemes
- alternatives need greater investment to be more realistic choices
- criticism of the consultation process (biased, unfair or similar).

4.66. TfL has considered and responded to these issues raised in Table 19, Table 29 and Table 33 in the Report to the Mayor (Appendix 1).

TfL's proposed modifications and mitigations

4.67. TfL is proposing that the following modifications are made and mitigations are implemented.

Modifications

4.68. It is not proposed that any changes are made to the Variation Order, and in turn, to the Proposed Changes, as a consequence of issues raised in the consultation responses. TfL is, however, proposing that three minor modifications unrelated to the consultation are made to the Variation Order:

- modification 1: certain articles of the Variation Order, which would give effect to most of the Proposed Changes (excluding the proposed amendment to charging days and hours), would come into force on a specific date (Monday 20 December 2021) instead of the day following the Mayor's decision
- modification 2: the article of the Variation Order which amends the charging days and hours would come into force on 21 February 2022 instead of 28 February 2022
- modification 3: the deadline for making a payment after the day of travel would be specified as "the end of the third day after the date of travel" instead of "the end of the third consecutive charging day after the day of travel".

4.69. Modifications 1 and 3 are intended to give greater operational certainty to the introduction of the Proposed Changes or their ongoing implementation. Modification 2 ensures that the changes to charging days and hours will come into force at the earliest possible date taking into account the replacement signage work that needs to be completed in order for the charging hours to be changed.

Modification 1

- 4.70. The Variation Order currently provides that the changes (other than to charging days and hours) would come into effect on the day following the Mayor's decision to confirm the Order. As the CC Scheme currently operates seven days a week, there would only be very limited time for any operational changes to be made to support the implementation of these changes if they were to come into force on the day following the Mayor's decision (any operational changes would effectively need to be done overnight).
- 4.71. It is now proposed that the date on which these changes would come into force is specified as Monday 20 December 2021 to allow for a short period in which the necessary operational changes could be made following the Mayor's decision. The date on which the proposed charging days and hours would come into force would not be impacted by this modification. The Variation Order already provides for this phased approach to implementation of the Proposed Changes as it already states that the changes to charging hours and days would come into force on 28 February 2022 (now to be changed to 21 February 2022, as explained in the paragraph below); and the other changes would come into force the day after the Mayor confirms the Variation Order.

Modification 2

- 4.72. Following further discussion with TfL's external suppliers, the date on which changes to charging days and hours would come into force could be brought forward by one week, from 28 February 2022 to 21 February 2022. TfL is, therefore, proposing that the Variation Order be modified to allow for the new implementation date of 21 February 2022 for the revised weekday and weekend charging hours.

Modification 3

- 4.73. The modification to the deferred payment deadline is necessary so as to accommodate the proposals that no charges apply on bank holidays and the period between Christmas and New Year's Day.
- 4.74. By replacing 'third consecutive charging day' with 'day' in the two relevant articles in the Scheme Order, the deadline for paying the charge will be constantly maintained as three days after the charging day on which the motor vehicle was used. Otherwise the payment deadline will vary depending on whether a bank holiday or the Christmas–New Year's Day period falls within the three days after travel, since the proposal is for bank holidays and the festive period to not be chargeable. If the Variation Order is not modified, there would be unnecessary operational complexity when dealing with deferred payments made for travelling on the charging day before a bank holiday or on Christmas Eve.
- 4.75. The modification does not conflict with the description of the proposed change included in the consultation materials, since the payment deadline was stated simply as being three days after travel.

Mitigations

- 4.76. If the proposals are implemented as consulted on, we recommend that additional actions to mitigate the impacts of the proposals are implemented. These include:
- providing NHS trusts with communication materials to inform their patients of the eligibility for the extended NHS reimbursement scheme, including for pregnant women
 - raising awareness of available discounts and exemptions, as part of the customer information campaign for the Proposed Changes; and through targeted stakeholder engagement with key groups, including faith groups

- undertaking additional targeted campaigning and outreach in relation to perceptions of safety on public transport for community groups, such as our campaign to support the safety of women and girls on our transport network.

Key risks and issues

4.77. GLA officers consider that TfL officers have adopted sound project management techniques in making these proposals (including those in the Variation Order); and that risks have been appropriately mitigated. Officers have taken the following steps to mitigate the risks:

- the Variation Order was made and the public and stakeholder consultation was conducted in accordance with relevant standards and the guidance issued by the Mayor (please see Report to the Mayor (Appendix 1) and section 3, above)
- the proposals were developed both through regular monitoring of the scheme both as a long-term (pre-pandemic) activity and in through reviewing the temporary changes that were implemented in summer 2020
- TfL commissioned Jacobs to prepare the IIA which considered the impacts of the proposals, including on targeted groups, which is provided to the Mayor for the purposes of informing his decision of on whether to implement the proposals (see Appendix B to the Report to the Mayor, which is attached to this form at Appendix 1)
- the consultation responses have been analysed and considered, and the Report to the Mayor has been prepared to assist the Mayor in deciding whether to implement the proposals; TfL officers sought legal advice throughout the process.

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

Links to Mayoral strategies and priorities

Mayor's transport duty and Transport Strategy

4.79. The Mayor has a "general transport duty" to "develop and implement policies for the promotion and encouragement of safe, integrated, efficient and economic transport facilities and services to, from and within Greater London" (section 141 of the Greater London Authority Act 1999). Transport facilities and services include "those required to meet the needs of persons living or working in, or visiting, Greater London". The Mayor must publish a "transport strategy", which includes the Mayor's policies and proposals for discharging the general transport duty (section 141 of the Greater London Authority Act 1999).

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

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

4.81. The proposal derives from Policy 5:

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

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

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

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

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

London Environment Strategy (LES)

4.84. In May 2018 the Mayor published a new LES, following a public consultation. The LES complements the MTS, and sets out the Mayor's aspiration to achieve a zero-carbon capital, including the need to implement a Healthy Streets approach and move to more sustainable transport including ultra-low and zero-emission vehicles. The Strategy recognises the relationship between vehicles, congestion and air pollution; and the need to set out a number of objectives and policies, in line with the Mayor's duties. The Mayor must have regard to provisions of the LES as relevant to the discharge of his functions, including whether or not to confirm the Proposed Changes, with or without modification. Relevant policies include:

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

The London Health Inequalities Strategy

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

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

Zero Carbon London: A 1.5°C Compatible Action Plan

- 4.86. In 2018, the Greater London Authority (GLA) published 'Zero Carbon London: A 1.5°C Compatible Plan', which presented a range of energy system scenarios for London consistent with a 2050 net-zero target. In 2020, the Mayor of London, Sadiq Khan, committed to set a target for carbon neutrality by 2030, which was reconfirmed by the Mayor's 2021 Manifesto. The CC Scheme leads to a reduction in traffic and associated carbon emissions.

Government guidance

- 4.87. The Proposed Changes are also in alignment with a number of government policies, with some of the most relevant summarised below.
- 4.88. In 2020, the government put in place a range of policies that support active travel, and seek to promote walking and cycling. While this took place in the context of the immediate need to respond to the COVID-19 pandemic, the approach extends beyond that period and signals greater commitment to sustainable modes at a national level.
- 4.89. The National Planning Policy Framework 2019 states that in making local plans, authorities should ensure that "opportunities to promote walking, cycling and public transport use are identified and pursued".
- 4.90. The Department for Transport report, 'Gear Change: a Bold Vision for Cycling and Walking' (2020), sets out how increased use of these modes has a wide range of benefits, including benefits to public health and wellbeing; the economy; and air quality and climate change. It mandated Streetspace reallocation and a hierarchy of users, with active travel at the top. The government also announced the creation of Active Travel England to oversee a £2bn programme in the UK over the life of this Parliament.
- 4.91. During the pandemic, the government also made changes to the Traffic Management Act 2004 to accommodate active travel, and to expect local authorities to make significant changes to their road layouts in order to give more space to cyclists and pedestrians.
- 4.92. In July 2021, the government made further changes to the Network Management Guidance¹³ setting out that it continues to expect local authorities to take measures to reallocate road space to people walking and cycling. The intention is to have "a lasting legacy of safer, greener travel". It states that the focus should now be on devising further schemes and assessing COVID-19 schemes with a view to making them permanent. The assumption should be that they will be retained unless there is substantial evidence to the contrary. Authorities should also be considering how to introduce further active travel schemes, building on those already delivered.

Use of revenue

- 4.93. The objectives of the CC Scheme are to reduce traffic and congestion in central London. Net revenues from the CC Scheme must be used for the purpose of directly or indirectly facilitating the implementation of the MTS. Information about the gross and net revenue of the CC Scheme is published in TfL's Annual Report and Accounts, which are available on TfL's website.

5. Financial comments

- 5.1. There are no direct financial implications for the GLA arising from this decision.
- 5.2. There would be operational costs to TfL of implementing the proposals. The net operating surplus for the new proposals (the difference between the income raised and the costs of operating the scheme) is expected to be around £60m to £80m per year.

¹³ <https://www.gov.uk/government/publications/reallocating-road-space-in-response-to-covid-19-statutory-guidance-for-local-authorities/traffic-management-act-2004-network-management-in-response-to-covid-19>

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

6. Legal comments

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

The Mayor's Transport Strategy (MTS)

- 6.2. The MTS provides an important legal basis for road user charging schemes. The proposals that the Variation Order seeks to implement must appear to be desirable or expedient for facilitating (directly or indirectly) the achievement of the policies and proposals of the MTS, as well as being in conformity with them.
- 6.3. Relevant policies and proposals have been identified in paragraphs 4.79 to 4.83 above. The Proposed Changes are considered to be in conformity with the MTS and desirable or expedient to its delivery. While the MTS identifies the challenges presented by traffic levels on both weekday evenings and weekends, the current proposal is for weekend charging to be introduced as a long-term proposition and within bespoke charging hours which reflect weekend traffic peaks. Although evening charging is not explicitly addressed by the Proposed Changes, the rationale for the proposed weekday charging hours has been explained in this document. When considered as a package, the Proposed Changes are likely to have some impact on congestion and mode choice in the evening hours notwithstanding that charges are not proposed to apply then. The MTS does not require that the challenges of weekday evening and weekend traffic levels be addressed simultaneously or in the same way. In line with proposal 20, the CC Scheme will continue to be kept under review and subject to change should it be considered necessary to introduce different measures to address future challenges.

Procedural considerations

- 6.4. TfL and the Mayor's powers to make changes to a road user charging scheme are exercisable in the same manner and subject to the same limitations and conditions as apply when a scheme is first established (paragraph 38 of Schedule 23 to the GLA Act 1999). The statutory procedure set out in Schedule 23 provides that a scheme (and changes to it) must be contained in an order. A variation order is the legal instrument through which proposed changes to an existing road user charging scheme are made. TfL, as the charging authority, is responsible for making the variation order but the order will only have legal effect if it is confirmed by the Mayor with or without modifications.
- 6.5. On 23 July 2021, TfL made the Greater London (Central Zone) Congestion Charging (Variation) Order 2021 ('the Variation Order') which contains the amendments to the Central London Congestion Charging Scheme Order 2004 (the Scheme Order') that are needed in order to give effect to the Proposed Changes set out in this decision form. As some of the Proposed Changes are the same as or similar to the temporary changes to the CC Scheme that were introduced in June 2020, the Variation Order is drafted so as to make the temporary changes apply indefinitely subject to the modifications set out. As a consequence, the Variation Order does not recite all of the amendments that are now proposed to be made but modifies the temporary amendments made in June 2020 so that they reflect the Proposed Changes and then applies those modified amendments indefinitely. A consolidated version of the Scheme Order will be published on TfL's website shortly after the Mayor's decision which will incorporate all of the changes which have been introduced.

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

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

6.7. Paragraph 34 of Schedule 23 provides that the Mayor may issue guidance to TfL in relation to the discharge of its road user charging functions. Statutory guidance was issued on 16 February 2007 (Mayoral Guidance) and remains applicable today. TfL must have regard to this guidance when exercising its functions.

6.8. In compliance with paragraph 4 of Schedule 23 and the Mayoral Guidance, TfL undertook the consultation detailed in this form and the Report to the Mayor, including discharging the publicity obligations. TfL has exercised the required functions under Schedule 23 having regard to the Mayoral Guidance.

6.9. So as to make a lawful decision as to whether to confirm the Variation Order, the Mayor must comply with the statutory procedural requirements relevant to the exercise of his functions under Schedule 23; and make a rational decision, after having taken into account all relevant considerations and discounting any irrelevant ones. The rationale and evidential basis for the Proposed Changes that the Variation Order, if confirmed, will give effect to is set out under headings, "Objectives and expected outcomes" (section 2); "Equality comments" (section 3) and "Other considerations" (section 4) above.

Modifications

6.10. At the time of confirming a variation order, the Mayor is permitted to make modifications to the order (paragraph 4 of Schedule 23). The modifications are being made at the request of TfL and are described in section 4 above. The modifications do not materially alter the Proposed Changes and are proposed so as to provide clarity and assist with operational implementation of the Proposed Changes or, in the case of the modified implementation date for charging hours, reflect the earliest possible date that this proposed change could be implemented taking into account the signage works which need to be undertaken. The modifications are set out in the Instrument of Confirmation (Appendix 5) that the Mayor is asked to sign should he decide to implement the Proposed Changes.

Power to hold a public inquiry

6.11. Paragraph 4(3) of Schedule 23 provides that the Mayor may "hold an inquiry, or cause an inquiry to be held, for the purposes of any order containing a charging". Whether an inquiry should be

held to consider issues associated with the Proposed Changes to the CC Scheme is a matter for the Mayor to decide.

- 6.12. It is not recommended that a public inquiry is held as it is unlikely to elicit any additional information which has not already been stated in consultation responses or identified in the IIA.

Considerations under the Human Rights Act 1998

- 6.13. Section 6 of the Human Rights Act 1998 provides that it is unlawful for a public authority to act in a way which is incompatible with the European Convention on Human Rights. As a public authority, the Mayor is required to consider possible interferences with people's Convention rights before deciding whether to confirm the Variation Order.
- 6.14. The Convention rights which might be engaged if the Proposed Changes are implemented are the right to privacy and family life (Article 8); the right to the peaceful enjoyment and protection against deprivation of possessions (Article 1 of the First Protocol (A1P1)); and the protection against discrimination on specified grounds (Article 14). Article 14 may also be engaged if the measure is within the scope or ambit of Article 8 or A1P1, even if there is no interference with those rights. These are qualified human rights, that is, they are subject to limitations which permit the rights to be restricted for certain specified purposes. In assessing whether any established interference with a convention right falls lawfully within a permitted category of restriction, the public body must demonstrate interference is provided for by law, pursues a specified legitimate objective and is a proportionate means of pursuing that objective (that is, is necessary in a democratic society), having regard in particular to the public benefit to be derived from the action.
- 6.15. The Mayor is advised to proceed on the basis that the decision is within the ambit or scope of Article 8 and A1P1, and that Article 14 is engaged (because the Proposed Changes fall within the ambit or scope of a Convention right) but that the interference and any differential impact under Article 14 can be shown by the Mayor to be justified. The Mayor's decision is in accordance with the law; pursues objectives including public safety, the protection of economic wellbeing, the protection of health, the protection of the rights and freedom of others (including the right to life) and the general interest; and is a necessary and proportionate response. In particular, there is no other less burdensome means of achieving the anticipated reduction in traffic in the CCZ (and other benefits identified above and in the IIA).

7. Planned delivery approach and next steps

- 7.1. The Mayor is asked to consider the Report to Mayor which is appended to this report (Appendix 1). He is also asked to consider whether further consultation, further information or the holding of a public inquiry is necessary or appropriate prior to deciding whether or not to confirm the variation order. If the Mayor considers that further consultation and the holding of a public inquiry are not necessary or appropriate, it is recommended that the Variation Order is confirmed with the modifications described above.
- 7.2. If the Variation Order is confirmed, notice of the confirmation will be published in the London Gazette and other media in accordance with the Mayoral Guidance. The Proposed Changes would be implemented on 20 December 2021, except for the changes to charging days and hours, which would be implemented on 21 February 2022.
- 7.3. As set out in MTS Proposal 20, the CC Scheme will continue to be kept under review by TfL to ensure its continued effectiveness in furthering or delivering the MTS.

Appendices and supporting papers:

Appendix 1 – Report to the Mayor on the consultation

Appendix 2 – Central London Congestion Charging Scheme (Variation) Order 2021

Appendix 3 – Summary table of impacts from the IIA

Appendix 4 – Sunday charging hours: review of proposed recommendation

Appendix 5 - Instrument of Confirmation

Public access to information

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

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

Part 1 – Deferral

Is the publication of Part 1 of this approval to be deferred? YES

If YES, for what reason: To allow for publication of the changes

Until what date: Until programme announcement has been made, expected 15/12/21

Part 2 – Sensitive information

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

Is there a part 2 form – NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to
confirm the
following (✓)

Drafting officer:

William Bradley has drafted this report in accordance with GLA procedures and confirms the following:

✓

Sponsoring Director:

Phil Graham has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.

✓

Mayoral Adviser:

Heidi Alexander has been consulted about the proposal and agrees the recommendations.

✓

Advice:

The Finance and Legal teams have commented on this proposal.

✓

Corporate Investment Board

This decision was agreed by the Corporate Investment Board on 13 December 2021

EXECUTIVE DIRECTOR, RESOURCES:

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

Signature

Date

D. Gane

14 December 2021

CHIEF OF STAFF:

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

Signature

Date

D. Bellamy

14 December 2021